

## APPEAL CONSIDERATION PROCEDURE

### 1. INTRODUCTION

The routine for appeal consideration has been drawn up in accordance with the Norwegian Securities Trading Act and the Financial Supervisory Authority of Norway's circular 12/2014 *Guidelines for appeal in banking, finance, insurance and investment firms* ("the Directive"), after which SpareBank 1 Markets ("SB1 Markets") appeal consideration procedure are publicly available.

### 2. PURPOSE

The purpose of this procedure is to contribute to sufficient client protection. Moreover, the procedure is in accordance with the guidelines for the companies' appeal consideration as specified by the European Union ("EU").

SB1 Markets will on request provide the complainant in writing, information regarding the appeal consideration procedure's including information on how complaints should be drafted. The Investment Firm's appeal consideration procedure is publicly available. Should the complainant request guidance the complainant can direct an inquiry to the attention of SB1 Markets Compliance by email [compliance@sb1markets.no](mailto:compliance@sb1markets.no). SB1 Markets will communicate with the client in a precise, distinct manner.

### 3. PROCEDURE

Should the client wish to complain regarding services rendered by SB1 Markets, the receiver of the complaint shall instruct the complainant to draw up a written complain. The complaint must be sent to SB1 Markets' complaints organ as soon as possible. The complaints organ is responsible for handling appeals received from clients. The complaint may be sent by mail to [klagebehandling@sb1markets.no](mailto:klagebehandling@sb1markets.no) or by regular post to SB1 Markets. Please state "Appeal" on the envelope.

The secretary of the complaints organ will register the complaint in the Complaints Register, and confirm in writing to the client that the complaint is received. The confirmation will include information regarding expected time of handling and regarding the clients right to have a complaint handled by the complaints board. SB1 Markets will reply to the complainant without any unnecessary delays. Internal information and documentation regarding an appeal that is relevant in relation to the complaint will be gathered as soon as possible and prior to the assessment of the complaint. SB1 Markets will in this respect also identify and limit any possible conflicts of interests. The client will also receive information according to the Norwegian Securities Trading Act, duty of custody, that the complaint normally will be kept on file for 5 years before being deleted. SB1 Markets retains the right to extend the custody if considered necessary or appropriate.

Should the processing time exceed the expected time of handling the client will be informed regarding the cause of this and as to when the appeal can be expected concluded. SB1 Markets ensure that all complaints will be handled properly and as quickly as possible.

The complaint will be analysed to expose any possible recurring and/or operational problems. If the complaint does not give sufficient basis for proper handling this will be conveyed to the client as soon as possible.

The client will be informed in writing regarding the outcome of the complaint. A written explanation will be given should the client be unsuccessful in their appeal. The client will also be informed regarding the right to complain to Norwegian Securities Dealers Association's Council of ethics.