



Central
Clearing House
and Depository
(Budapest) Ltd.

Complaint Management Regulation of KELER Group

**Extract of the Complaint Management Regulation
of KELER Group effective from 01 August 2013**

Scope of regulation

Material scope: this regulation covers all complaints received by the KELER Group in writing, orally, over the phone and electronically.

Personal scope: the organizational units and employees of KELER and KELER CCP Ltd. involved in complaint management and persons with permanent agency contract with KELER, and KELER CCP.

1.4. References

Related regulations:

- General Business Rules
- 4-18 Confidentiality Regulation (following Group-wide entry into force: 6-08 Confidentiality Regulation)

References to legislation:

- Regulation (EU) 648/2012 of the European Parliament and of the Council of 4 July 2012 on OTC derivatives, central counterparties and trade repositories (EMIR)
- Commission Delegated Regulation (EU) No 153/2013 of 19 December 2012 COMMISSION DELEGATED REGULATION (EU) No 153/2013 of 19 December 2012 supplementing Regulation (EU) No 648/2012 of the European Parliament and of the Council with regard to regulatory technical standards on requirements for central counterparties
- Act CXX of 2001 on The capital market (Tpt.)
- Act CXII of 1996 on Credit Institutions and Financial Enterprises
- Act CXXXVIII of 2007 on Investment Firms and Commodity Dealers and on the Regulations Governing their Activities (Bszt)
- Act CLVIII of 2010 on the Financial Supervisory Authority (PSZÁF)
- PSZÁF Decree 19/2011 (X.20.) on Reporting Obligations of Credit Institutions
- National Bank of Hungary Order 9/2009. (II.27.) on the Requirements on the General Business Conditions and Regulations of the Organization Undertaking Clearing House Activity Pursuant to the Act on the Capital Market
- National Bank of Hungary Order 10/2009. (II.27.) on the Requirements on the Regulations of the Central Depository.
- National Bank of Hungary Order 11/2009. (II.27.) on the Requirements of the Regulations of the Organization Undertaking Central Counterparty Activity Pursuant to the Act on the Capital Market
- PSZÁF Decree 5/2012. (IX.11.) on the Rules on Complaint Management by Financial Institutions, Payment Institutions and Electronic Money Issuer Institutions
- Recommendation 11/2012. (XI. 8.) by the President of PSZÁF on Complaint Management by Financial Organizations

Abbreviations used in the regulation

SÜI	Strategy and Client Relations Directorate
ÜMO	Client Relations and Marketing Department
SD	Service Desk
KIBO	Issuer Department
PSZÁF	Financial Supervisory Authority
KELER	Central Clearing House and Depository (Budapest) Ltd.
KELER KSZF	KELER CCP Central Counterparty Ltd.
KELER Group	KELER and KELER CCP jointly

Definition of complaint

For the purposes of this regulation any communication received orally (personally, over the phone) or in writing (document delivered personally or by mail, telefax, electronic mail) containing a complaint regarding the operation, conduct, activity or failure of KELER Ltd. and KELER CCP Ltd. that request investigation, measures to be taken or make financial claims are considered complaints. Request by authorities are not considered complaints except for requests by the Supervisory Authority expressly forwarded to the party involved for investigation related to issues submitted to the Supervisory Authority by the Complainant.

2. Method and deadline of complaint management

In accordance with the Outsourcing Agreement concluded by KELER CCP and KELER complaints related to the operation of KELER CCP are managed by KELER as outsourced activity.

Complaints can be submitted as follows to the KELER Group:

Oral complaints can be made as follows:

- a) Personally at the Client Service of KELER (KELER Ltd., 9-11 Asbóth utca, Budapest, H-1075), in the opening hours of the Client Service (from 9:00 hrs. until 15:00 hrs. from Monday to Friday).
- b) Over the phone at phone number: +36-1-483-6100 from 7:00 hrs. until 20:00 hrs. from Monday to Friday.
- c) Business applications related error reports can be made at phone number +36-1-483-6120 from 7:00 hrs. until 20:00 hrs. from Monday to Friday to KELER Service Desk.

Written complaints can be submitted as follows:

- a) In a document delivered personally or by a third party to the address of KELER and KELER CCP Ltd. at 9-11 Asbóth utca, Budapest H-1075 or by recording the complaint in the Book of Complaints at the Client Service.-
- b) By mail, to the mailing address of KELER (KELER Ltd., 9-11 Asbóth utca, Budapest H-1075) for KELER Ltd., to the mailing address of KELER CCP (KELER CCP Ltd., 9-11 Asbóth utca, Budapest H-1075) for KELER CCP Ltd.

- c) By fax, to KELER Ltd. at fax number +36-1-483-6194, to KELER CCP Ltd. at fax number +36-1-342-3539, continuously.
- d) In electronic mail to e-mail address keler@keler.hu or the business e-mail address of employees of KELER Ltd. to KELER Ltd., to the e-mail address kelerccp@kelerkszf.hu or the business e-mail address of employees of KELER CCP Ltd.
- e) Business applications related error reports can be submitted in electronic correspondence to KELER Service Desk at e-mail address servicedesk@keler.hu.

The Client can authorize a representative. If the Client authorizes a representative, the authorization must comply with the requirements stated in Act III of 1952 on the Code of Civil Procedure.

If the Client disagrees with the management of the complaint, the ÜMO takes minutes on the complaint and the related opinion and hands over a copy of the minutes to the Client in the case of oral complaints, sends it to the Client together with its opinion and explanation within 15 business days of making the complaint in the case of oral complaint over the phone, in other cases it proceeds in line with the requirements of written complaint management.

If the complaint cannot be investigated immediately, the employee handling the complaint records the complaint in minutes and hands over to the Client a copy of the minutes if oral complaint is made personally, in case of oral complaint over the phone sends to the Client the minutes on the complaint and the point of view of KELER Ltd. with justification within 15 business days of making the complaint, in other cases the employee acts in line with the provisions on written complaints.

If the complaint is rejected, the Client is required to be informed that if consumer protection provisions under the Act on the Financial Supervisory Authority are violated the Client can initiate consumer protection proceeding at the Financial Supervisory Authority (Krisztina Plaza, 39 Krisztina Krt., Budapest H-1013) (PSZÁF form is available here: [PSZÁF complaint form](#)) or the Client can go to court with legal disputes regarding the creation, validity, legal effects and termination of the contract, furthermore breach of contract and its legal effects or can request procedure by the Financial Arbitration Body (Pénzügyi Békéltető Testület, address: 39 Krisztina Krt., Budapest H-1013, mailing address: H-1525 Budapest BKKP POB 172).

Complaint management deadline

The deadline to close the complaint or provide information to the Complainant is 15 business days from time of receipt of the complaint.

Method of registering the complaint

The complaint management employee designated and authorized in the organizational unit in charge of complaint management is required to register the complaint and the process of solving it. The designated employee is obliged to register the complaint and data related to solving it in the complaint management data base of KELER Ltd.

Correspondence (electronic and printed) and other documents related to the complaint, documents containing the complaint and the response provided to the complaint are to be retained by the organizational unit involved for three years and to be presented to the Supervisory Authority if requested.

Process to be followed in case of other communication submitted

If the question submitted by the complainant is not considered a complaint pursuant to the provisions of this regulation or KELER or KELER CCP are not competent to respond the question submitted, following consultation with the Legal Counsel KELER or KELER CCP will inform the complainant on the methods available to enforce claims and on the competent organizations or organizations with jurisdiction.