

In the event of a violation of any provision of the agreement by LLC Tpay (hereinafter referred to as the “Company”) or dissatisfaction with the service provided, you may submit a complaint.

A complaint may be submitted through the following channels:

- By contacting the Call Center: (032) 500 01 02
- Electronically: [complaints@flitt.com](mailto:complaints@flitt.com)
- Through the anonymous whistleblowing webpage: [Hotline](#)

As a member of the TBC Group, our Company is committed to conducting its business activities in line with professionalism, integrity, and adherence to business ethics. Therefore, through the anonymous whistleblowing webpage, you are provided with the opportunity to report an incident/violation or raise a reasonable suspicion regarding any of the following actions committed by any employee of the Company:

- Participation in schemes related to fraud, corruption, or money laundering;
- Violation of the Company’s internal policies/regulations/instructions;
- Moral, psychological, or physical harassment/bullying of a Company employee;
- Failure to disclose or disregard a conflict of interest;
- Commission of a criminal offense (including theft, document forgery, and others);
- Any form of inappropriate conduct that may jeopardize the Company’s interests, cause financial or reputational damage, and/or hinder any employee of the Company from properly performing their assigned duties.

You may use the secure anonymous whistleblowing webpage of your choice: [Hotline](#). The report submitted will be reviewed by the relevant department of the Company.

The maximum period for reviewing a complaint shall be no later than one month after the submission of the application by the complainant and, where necessary, from the identification of the customer.

The review period for a complaint/claim related to payment services shall be no later than 15 business days from the receipt of the complaint/claim (or, in exceptional cases, no later than 35 business days).

The review period for an application/complaint submitted within the scope of the Personal Data Protection Law shall be no later than 10 business days from the receipt of the complaint.



You will be informed of the decision made regarding the complaint in writing and/or through other means of communication (including written notice or email), as agreed with you or in the same way the complaint was submitted.

For information regarding the complaint review process, please contact us via the Company's email address.

In accordance with the Law of Georgia on Payment Systems and Payment Services, the customer is entitled to file a complaint against the payment service provider with the Dispute Resolution Commission operating under the National Bank of Georgia (hereinafter referred to as the "Commission"), within the timeframes established by Georgian legislation and/or this Agreement, in cases where the Company has failed to fully or partially satisfy the customer's complaint in the customer's favor (including failure to provide a response to the customer). The right to submit a complaint under this paragraph arises if the value of the disputed matter specified in the complaint does not exceed GEL 50,000 (or its equivalent in foreign currency based on the exchange rate applicable on the date of the disputed action or the submission of the complaint).

At the same time, the customer has the right to apply directly to the court without first applying to the Commission. The customer is authorized to apply to the Commission no later than 6 (six) months from the date of submitting the complaint to the Company.

The Commission shall review complaints referred to in this paragraph free of charge. Detailed information regarding the Commission's operating procedures (including the rules and procedures for filing a complaint) can be found in Resolution No. 2 of the Board of the National Bank of Georgia dated July 26, 2023 ("Rules of Procedure of the Dispute Resolution Commission under the National Bank of Georgia").

For useful information, please visit the website of the National Bank of Georgia — [www.nbg.gov.ge/cp/](http://www.nbg.gov.ge/cp/) and/or contact the hotline at: +995 32 2 406 406.

#### Frequently Asked Questions:

1. What is the purpose of the anonymous whistleblowing webpage?

The anonymous whistleblowing webpage has been created for any individual who possesses information or has a reasonable suspicion regarding incidents/violations within the Company but refrains from reporting such information through other channels.



2. How should I report information related to an incident/violation?

By clicking the “Report” button on the anonymous whistleblowing webpage, you will be directed to a secure electronic form to be completed. Through the fields provided in the form, you should indicate the key information necessary for analyzing the case reported by you.

In the electronic form, you have the option to provide your first and last name and email address; however, these fields are voluntary. If you wish to remain anonymous, you may leave these fields blank.

It is recommended that you provide an email address so that we may contact you for the purpose of obtaining additional information or clarifying the reported matter. In this regard, you may provide an email address that does not contain personally identifiable information (such as your first or last name).

You also have the option to attach supporting document(s) to the incident description, where available.

3. Apart from the anonymous whistleblowing webpage, is there any other way to submit information to the Company regarding an incident/violation?

- By contacting the Call Center: (032) 500 01 02
- Electronically: [complaints@flitt.com](mailto:complaints@flitt.com)

4. How does the Company ensure my anonymity?

When reporting information through the anonymous whistleblowing webpage, the IP address of the individual reporting is not logged.

5. If I openly report information related to an incident/violation, will the Company keep my identity confidential?

Your identity, as well as the information provided by you, shall be treated as strictly confidential, except in cases where the processing of the incident/violation requires cooperation with the court or investigative authorities.

6. What types of incidents/violations can be reported through the anonymous whistleblowing webpage?

Through the anonymous whistleblowing webpage, you should report any incident/violation that you consider unethical, unlawful, infringing upon rights, or related to fraud, forgery,



corruption, violence, or any other form of inappropriate conduct, including but not limited to:

- Dishonest actions by an employee that may cause financial damage to the Company;
- Intentional falsification or concealment of actual facts or data;
- Abuse by an employee of their position within the Company and the rights and obligations assigned to them, whether for personal purposes or for the benefit of third parties;
- Harassment and/or pressure against an employee;
- Failure to disclose or disregard a conflict of interest;
- Disclosure of confidential information to third parties in violation of internal regulations and legislative requirements;
- Trading in the Company's shares based on insider information;

Any other form of inappropriate conduct that may jeopardize the Company's interests, cause financial or reputational damage, and/or hinder any employee of the Company from properly performing their assigned duties.

7. Why should I report information related to an incident/violation?

- Because values such as openness, integrity, trust, and professionalism are important to you.
- If you believe that the incident/violation about which you possess information does not directly affect you and therefore choose to follow a "principle of silence," you may place the Company's operations at risk.
- Reporting information about an incident/violation at an early stage helps protect the Company and each of its employees from potential harm.
- Early reporting of an incident/violation also helps safeguard the Company and its employees from possible financial, operational, or reputational damage.