



PUBLIC COMPLAINT HANDLING POLICY OF ING BANK N.V. HUNGARY BRANCH

(EFFECTIVE AS OF 15 FEBRUARY 2014)

ING Bank N.V. Hungary Branch (1068 Budapest, Dózsa György út 84/b.; court registration number: 01-17-000547) acting on behalf of ING Bank N.V. (a corporation organized and existing under the laws of the Netherlands having its registered office at 1102 MG Amsterdam Zuidoost, Bijlmerplein 888., place and number of registration: Trade Register Amsterdam no. 33031431) (hereinafter: ING Bank) shall act in accordance with the requirements of the effective laws and regulations in respect of the Client's complaint request. The effective laws and regulations do not fully include in every case these points of views which have been constructed by ING Bank in its market practice and successfully used by ING Bank during its activity in order to manage more efficiently its operation and to satisfy its Clients' claims in a higher level. Present Client's complaint handling policy (hereinafter: Policy) includes these principles and practice which have priority in the construction and use of ING Bank's activity of Client's complaint handling, which ING Bank knows as market practice to be followed and which ING Bank follows in accordance with the statutory duties set out in laws and on the other hand - by the recognition of the increased significance of the market self-regulatory tendencies -, without any statutory duties, as accepted standard of high level Client's complaint handling. Principal is that ING Bank treats the complaints and the Clients without any discrimination, equally and in accordance with the same procedure and rules.

ING Bank completely investigates and answers the complaints of Clients against the activity, or neglect of ING Bank, prior to concluding of the contract or regarding the negotiating of contract, ING Bank's fulfilment during the term of the contract, termination of the contract, or settlement of the legal dispute arising thereafter (hereinafter referred to as: the "complaint").

The Plaintive can be natural person, legal entity, business association without legal personality or other association, which is provided by ING Bank with its services or which is the addressee of the information or offer related to the services. In terms of this Policy a consumer shall mean a natural person acting for the purposes outside his/her self-profession and economic activity.

I. Means of reporting a complaint

The Client complaint record and the Client complaint's handling are executed by the Client service officers at Client Service Department. In the course of Client complaint's handling, if the Client is not satisfied with ING Bank's first response, the neutrality and the impartiality of the professional department shall be granted. The order of the clearance of complaints suits to the structure and speciality of ING Bank.

If the written complaint is sent not to department defined appointed for complaint handling by this Policy, or the Client presents the written complaint in the client service area not to the officer appointed for complaint handling, ING Bank shall without delay after reception pass on the complaint to the complaint handling department. In case of written complaints presented in the client service area personally, ING Bank shall inform the Client of the contact details of the department handling of the complaint in the future. If the Client presents the verbal complaint not to the officer appointed for complaint handling, ING Bank shall inform the Client of the contact details of the department handling of the complaint in the future.

ING Bank ensures that the Client could submit the complaint against the activity, or neglect of ING Bank verbally (personally, over phone) or in writing (personally or by a letter delivered by a third party, by post, fax, or email). ING Bank helps the Client with drafting and filing of the complaint.

Therefore ING Bank makes available to the Client proper forms and other suitable methods for filing of the complaint.

1. Verbal complaint

a.) Personally:

- aa) venue of complaint handling: official seat of ING Bank, in the client service area (1068 Budapest, Dózsa György út 84/b),
- ab) opening hours: every working day from 8 a.m. until 16. pm.;

b) By phone:

- ba) phone number: +36 1 235 8814, +36 1 235 8755, +36 1 235 8835, +36 1 235 6737,
- bb) open for calls (opening hours): on one working day of the week (on Monday) from 8 a.m. until 20 p.m., and on all other working days from 8 a.m. until 16 p.m.;

2. Written complaint

- a.) personally or by a letter delivered by a third party
- b.) by post (post address: H-1461 Budapest, Pf.: 320);
- c.) by fax (fax number: +36 1 235 2040)
- d.) by email the written complaints are continuously received (electronic mailing address: client.service.hu@ingbank.com, in case of malfunction: bank.info.hu@ingbank.com)

The Appendices of the present Policy comprises further contact data of ING Bank for the purpose of filing complaints.

In each case the complaint is registered by ING Bank. ING Bank shall pay particular attention for that the data requested for identification purposes do not violate the regulation of data protection, and the data may not serve purposes other than registration of the Client's complaint cases.

3. The Client may proceed through a proxy holder too. If the Client proceeds through a proxy holder, the power of attorney shall be executed as a notarial document or full probative force private document. If the complaint is filed by an attorney or representative, ING Bank shall examine the competence for filing. In case of use of the complaint's statement form, beyond the name of the Plaintiff the name of the representative and the proxy filing the complaint, including the proxy by law and proxy under power of attorney, shall be presented thereon as well (e.g. company representative, proxy of natural person, etc.). In lack of power of attorney, ING Bank directly turns to the Plaintiff in order to manage faster Client complaint's handling. When the submission of the complaint was inappropriate regarding the assessment of the submission entitlement, then ING Bank could ask for the post approval of the complaint submission.

II. Investigation of a complaint

ING Bank completely investigates and answers the complaints.

The investigation of the complaint is free of charge; ING Bank may not charge a separate fee for that. The investigation takes place considering all relevant circumstances.

ING Bank meets its obligation concerning the examination and decision of the complaint in the time frame determined by ING Bank paying attention for the deadline set out in the laws. If the deadline shall be extended for any reason, ING Bank will inform the Client of the new deadline and provides the Client with the precise justification for it.

Such employee of ING Bank will not take part into the decision procedure, who took part into the instruction or decision complained by the Plaintiff.

The language of the Client's complaint handling is Hungarian, or, upon request of the Plaintiff may be English.

ING Bank treats and registers the incoming complaints in the transparent system created by ING Bank in accordance with standard principles, in such a way that makes the follow up of complaints possible in every stage of the complaint handling procedure.

For the sake of transparent complaint handling, ING Bank has introduced a complaint handling policy for the purpose of the efficient, transparent and swift handling of Clients complaints, the method of complaint handling and the rules of keeping of registry containing the complaints, and their settlement or solution measures. ING Bank shall regulate all the substantial conditions of the complaint handling in the complaint handling policy. ING Bank determines the system and process of the complaint's handling system in its internal regulation so that the responsibilities and tasks related to the evaluation of such complaint and the decision rights as well are unambiguously determined. The certain proceeding phases and the responsible persons are unambiguously determined during the complaint handling procedure.

1. Verbal complaint

- 1.1. Personal complaints (including complaints submitted personally or by phone) must be immediately examined and resolved, if possible. In case of a complaint made through telephone, the Bank shall act as can be expected generally in order to receive the call personally within 5 minutes from the successful establishment of the call. If investigation of the complaint is not possibly immediately, ING Bank executes a Minutes of the complaint.
- 1.2. In case of telephone complaint handling procedure, ING Bank shall record the phone communication between ING Bank and the Client by means of audio recording. In case of a verbal complaint submitted by phone, the Client shall be notified that a record of the conversation is made.
- 1.3. The audio recording of the complaints submitted by phone must be preserved for one year.
- 1.4. Upon the Client's request, ING Bank shall ensure the re-listening of the audio record, moreover it shall provide the certified minutes of the audio record free of charge.
- 1.5. If the Client does not agree with the handling of the verbal complaint, ING Bank registers the complaint and ING Bank's position related thereon in Minutes according to the form of Appendix 2.
- 1.6. In case of verbal complaint submitted personally, ING Bank shall hand over one copy of the Minutes to the Client, and on the other hand, in case of verbal complaint submitted over phone, the Bank shall deliver the copy of the Minutes to the Client, simultaneously with the answer to the complaint, otherwise the rules of written complaints shall apply. In such cases, the answer accompanied with a justification shall be sent within 30 calendar days from the reporting of the complaint. In case of personal delivery of the Minutes, the Plaintiff shall confirm the reception of one copy by its signature. Should the Plaintiff refuses to do so, the Bank shall record in the Minutes this fact and that the delivery has took place. The complaint shall be recorded in Minutes (either in the form of Appendix 2 or in other form) if so requested by one of the parties as well.
- 1.7. If the rule of laws prescribes the execution of a Minutes, it contains the following at least:
 - a) name of the Client,
 - b) address, official seat of the Client or mailing address if necessary,
 - c) date, place and form of submission of the complaint,
 - d) description of the complaint, separately listing the objections related to the complaint in order to have all objections listed in the complaint completely investigated,
 - e) the contract number affected by the complaint, Client number depending on Client,
 - f) the list of documents, papers and other evidences presented by the Client,
 - g) if the prompt investigation of the complaint is impossible, the signature of person recording the Minutes and signature of the Client (except for verbal complaints presented through phone), and
 - h) place and date of the record of the Minutes.

ING Bank delivers the Minutes to the Client in a way that proves the person of addressee, the mailing address and proves without doubt the fact and date of delivery.

2. Written complaint

- 2.1. ING Bank makes available the form used in the frame of written complaint's handling determined by Appendix 3 named "Complaint statement form" (hereinafter: Complaint statement form") in its client service area and on its Internet website. ING Bank shall send its reasoned point of view in connection with the written complaint to the Client within 30 days from the filing of the complaint. If the decision refers to the laws, ING Bank informs the Client of the number and content of the regulation as well.

Following investigation of the complaint ING Bank shall deliver an answer to the Client which includes in detail the outcome of the complete investigation of the complaint, the measures made for the settlement or solving of the complaint or the reason of the refusal of the complaint. ING Bank accompanies the result of the investigation with an accurate, understandable, and unambiguous justification, which (depending on the subject matter of the complaint) includes the accurate text of the contractual terms or policy, refers to the settlements sent to the Client, and other information provided to the Client during the contractual relationship.

In case of refusal of the complaint of a Client qualifying as a consumer, ING Bank informs the Client that the complaint and the complaint handling in the opinion of ING Bank is aimed at:

- a.) the settlement of a legal dispute regarding the concluding, validity, legal effects and termination, furthermore the breach and legal consequences of a breach of the contract or
- b.) the investigation of the infringement of the provisions relating to consumer protection pursuant to Act CXXXIX of 2013 on the National Bank of Hungary.

ING Bank shall inform the Client qualifying as a consumer that:

- a.) in case of Sub-section a) above, the Client may turn to the Financial Conciliatory Body (contact details are defined in Sub-section a) of Section IV), or the competent Court in accordance with the rules of the Code of Civil Procedure,
- b.) in case of Sub-section b) above, the Client may initiate a consumer protection supervision procedure of the National Bank of Hungary (contact details are defined in Sub-section b) of Section IV).

If, in the opinion of the Bank, the complaint is affected both by Sub-clause a) and b) above, it shall inform the Client qualifying as a consumer that which part of the complaint belongs under the scope of Sub-clause a) and b), and consequently, where the Client may turn to with the relevant part of the complaint. ING Bank informs the Client in a manner which is suitable to attend the attention.

In case of refusal of the complaint ING Bank shall inform the Client not qualifying as a consumer that the Client may turn to the competent Court with the complaint.

ING Bank provides the Client with the above mentioned information in a way that is able to call the Client's attention. ING Bank delivers the response to the Client in a way that proves the person of addressee, the mailing address and furthermore proves without doubt the fact and date of delivery.

III. ING Bank may require in particular the following information from the Client:

- a) name;

- b) contract number, client number;
- c) address, official seat, mailing address;
- d) phone number;
- e) method of notifications;
- f) product or service affected by the complaint;
- g) description and cause of the complaint;
- h) Client's claim;
- i) copy of documents in the possession of the Client supporting the complaint which are not in the possession of ING Bank;
- j) valid power of attorney if the Client acts through an attorney; and
- k) other data necessary to investigate, respond the complaint.

If further information in the possession of the Client is necessary in the examination of the complaint, considering in particular the Client identification, or the legal relationship affected by the complaint, ING Bank shall, without delay contact the Client and collect such information.

The particulars of the Client filing a complaint shall be processed in accordance with the stipulations of the Act. CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

IV. Information providing duties regarding the complaint handling

1. ING Bank shall inform the Client regarding the complaint handling in accordance with the relevant stipulations of the rule of law, using simple language. In case of a verbal complaint if the prompt investigation is not possible or it is not successful, ING Bank shall inform the Client of the identification data of the complaint.

The form and contents of the blankets used in the frame of complaint's handling is determined by Appendix 2 named "Minutes" and by Appendix 3 named "Complaint statement form" and as well as by Appendix 4 named "Bank's response". Notwithstanding the previous sentence, ING Bank may send its response to the Plaintiff either in the form of Appendix 4 or in a letter of response with content and in a form chosen by ING Bank.

ING ensures that written complaints can be filed by the Client on a form published on the website of the National Bank of Hungary. ING Bank makes the form available to the Clients on its website. ING shall accept written complaints filed in other forms as well.

In case of refusal of the complaint or failure in the keeping of the 30 days response deadline stipulated by law, Clients qualifying as a consumer may turn to the followings:

- a) Financial Conciliatory Body (in case of a legal dispute regarding the concluding, validity, legal effects and termination, breach and legal consequences of a breach of the contract, mailing address: H-1525 Budapest BKKP Pf. 172, telephone: +361-4899-100, e-mail: pbt@mnb.hu);
 - b) National Bank of Hungary (mailing address: 1534 Budapest BKKP Pf. 777, telephone: + 36 1-4899-100, e-mail: ugyfelszolgalat@mnb.hu);
 - c) court.
2. In case of refusal of the complaint or failing to keep the 30 calendar day's official deadline open to answer the complaint, the Client not qualifying as a consumer may turn to the competent Court.

V. Registration of the complaint

1. ING Bank shall keep a registry of the complaints, and the measurements made for the settlement and resolving of them. The register contains:
 - a) description of the complaint, description of the event or fact serving as a base for the complaint;
 - b) date of presentation of the complaint;
 - c) description of the measures made for the settlement or resolving, in case of refusal, the reason for that;
 - d) deadline for fulfilment of measures and the person responsible for execution;
 - e) date of answer to the complaint.
2. ING Bank shall keep the complaint and its response for a period of three years in its custody. ING Bank shall present the complaint and the response upon the request of the National Bank of Hungary.

ING Bank shall establish its register regarding complaints in such way that the date of the reply can be clearly identified. The register shall be able to enable ING Bank to

- a) arrange the complaints into groups depending on their topics;
- b) reveal and identify the facts and events serving giving reason for the complaint;
- c) examine if acts and events defined in Sub-clause b) may have an influence on other proceedings, products or services;
- d) initiate a proceeding for correction the revealed facts and events defined in Sub-clause b);
and
- e) summarize the persistent or system-level problems, legal risks.

ING Bank keeps the records in its own computer system electronically. ING Bank shall ensure the safety and protection of the registered information and that only the authorized persons shall have access to this information.

ING Bank constructs and conducts the complaint's registration in order that it could be appropriate for making statistics and other analyses having goals inter alias to the measuring of the effectiveness of the Client's complaint handling. ING Bank prepares regularly analysis about the complaints, but minimum per year, in which ING Bank estimates the most affected products, the business line or other operational fields and determines the necessary and possible instructions for the prevention or reduce of the complaints. The goal of the analyses is to implement the experiences arising from the Client's complaints cases into the operational procedure.

ING Bank develops its activity related to the Client's complaint handling regarding its aspects of customer protection of the Client's requirements and its own business politic.

The present Policy is made in English and Hungarian languages. In case of any inconsistency or discrepancy between the English and Hungarian version, the Hungarian version shall prevail.

ING Bank shall publish the present Policy in its premises open to Clients and on its webpage in a visible manner, which is appropriate for calling the attention.

The present Policy is the amendment of ING Bank's previously effective Complaint Handling Policies in a restated form.

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APPENDIX 1
OF THE COMPLAINT HANDLING POLICY OF ING BANK N.V. HUNGARY BRANCH
MAIN DATA OF ING BANK N.V. HUNGARY BRANCH

Location:	Budapest
Official Name:	ING Bank N.V. Hungary Branch (representing its founder)
Registered address:	1068 Budapest, Dózsa György út 84/b.
Place of complaint handling:	1068 Budapest, Dózsa György út 84/b.
Correspondence address:	H-1461 Budapest, Pf.:320
Data of the founder foreign enterprise:	ING Bank N.V. (a corporation organized and existing under the laws of the Netherlands having its registered office at Bijlmerplein 888, 1102 MG in Amsterdam, place and number of registration: Trade Register of the Chamber of Commerce and Industry for Amsterdam, no. 33031431)
Regulator:	National Bank of Hungary Budapest (H-1534 Budapest, BKKP Pf. 777) 1013 De Nederlandsche Bank (Postbus 98, 1000 AB Amsterdam Westeinde 1, 1017 ZN, The Netherlands; webpage: www.dnb.nl)
Governing law:	Hungarian
Governing jurisdiction:	Central District Court of Pest / Metropolitan Court
Exchange memberships:	Budapest Stock Exchange
License	The permitted activities are listed in the notification no: 40468/4/2008 of the Hungarian Financial Supervisory Authority
Language for communication:	English/Hungarian
Website address:	www.ing.hu
Electronic correspondence address:	client.service.hu@ingbank.com In case of malfunction: bank.info.hu@ingbank.com
Contact for notices:	Client service officers at Client Service Department
Other contact details:	Telephone number: +36 1 235 8814, +36 1 235 8755, +36 1 235 8835, +36 1 235 6737 Telefax: +36-1-235-2040

APPENDIX 2
OF THE COMPLAINT HANDLING POLICY OF ING BANK N.V. HUNGARY BRANCH
MINUTES FOR VERBAL (PERSONAL OR PHONE) COMPLAINT

BANKS HEADING!

Designation of Client's group: Corporate: ; Custody: ; FM ; EM ; Retail (investment bond) ; Other Retail: ¹.

Client's Name and Address/Official seat: _____

Client's mailing address: _____

Client's ID: _____

Account Number: _____

No. of contract affected by the complaint: _____

Name of reporting person (if not identical with the Client's name): _____

Phone Number: _____

Mobil Phone Number: _____

Email address: _____

Registration number of the Minutes: _____

Date, time and manner of submission of the Minutes: _____

Method of verbal complaint's submission: via telephone: , personally: ¹,

Reason of the registration: the Plaintiff does not agree with the prompt handling of the verbal complaint: , the immediate examination of the complaint is not possible: ¹, other: _____

Detailed description of the complaint, with separate registration of objections affected by the complaint in order to have all objections listed in the complaint completely investigated: _____

List of documents, papers and other evidences presented by the Client: _____

Immediate investigation of the complaint is possible: yes: , no: ¹

If the immediate investigation of the complaint is possible, the point of view of the complaint handling administrating person and decision maker related to the complaint: _____

ING Bank shall will its reasoned point of view related to the complaint within thirty calendar days from the submission of the complaint.

The original copy of the present Minutes has been handed over to the Plaintiff, but the Plaintiff has refused to confirm the reception of delivery: ^{1,2}

Place and date: _____

 Signature of the Complaint Handling Employee
 of ING Bank N.V. Hungary Branch

I confirm the reception of one copy of the Minutes: ²

Place and date: _____

 Plaintiff's signature

¹ Please make to the appropriate category!

² In case of verbal (personal) complaint

APPENDIX 3
OF THE COMPLAINT HANDLING POLICY OF ING BANK N.V. HUNGARY BRANCH
COMPLAINT STATEMENT FORM
FOR WRITEN COMPLAINT

The undersigned, _____, Client's name if not identical with the reporting person's name: _____, as Plaintiff (address/official seat: _____; telephone number: _____; mobile phone number: _____; e-mail address: _____; Client identification number: _____; bank account number: _____) hereby report the following complaint against ING Bank N.V. Hungary Branch (1068 Budapest, Dózsa György út 84/b., court registration number: 01-17-000-547; hereinafter: ING Bank), as receiver of the complaint, on the date set out below.

Hereunder there is a possibility for the short, brief description of the complaint's nature, for the exposition of the complaint's reasons, explanation and material circumstances, for the registration of the objections affected by the complaint, and for the designation of the Plaintiff's definite claim:
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Please examine the above-mentioned complaint as soon as possible, and send the results to my address written above.

Budapest, _____

Plaintive's signature

The above-mentioned complaint has been received by the complaint-handling employee of ING Bank N.V. Hungary Branch.

Budapest, _____

signature of the Complaint Handling Employee of
ING Bank N.V. Hungary Branch

APPENDIX 4
OF THE COMPLAINT HANDLING POLICY OF ING BANK N.V. HUNGARY BRANCH
BANK'S RESPONSE

Client's name: _____

Client's official seat/address: _____

Designation of Client's group: Corporate ; Custody: ; FM: ; EM: ; Retail (investment bond) ;
Other Retail: ¹

Registry number of the complaint statement form: _____

Date of receipt of complaint: _____

Method of complaint's submission: verbal form (personally): , verbal form (over phone): ,
written form (personally): , written form (by other person): , written form (by postal mail): , written
form (by telefax) : , written form (by electronic mail): ¹

In case of verbal (personally or over phone submitted) complaint, the prompt investigation of the complaint was possible: yes: , no: ¹. If the answer is positive, the Plaintiff has agreed with the complaint handling at the venue: yes: , no: ¹.

Dear Client!

Your complaint submitted to ING Bank N.V. Hungary Branch (having its registered office at H-1068 Budapest, Dózsa György út 84/B, place and number of registration: Court of Registration Budapest; Cg.: 01-17-000547, member of the Budapest Stock Exchange, the permitted activities are contained in the notification no: 40468/4/2008 of the Hungarian Financial Supervisory Authority) acting on behalf of ING Bank N.V. (having its registered office at Bijlmerplein 888, 1102 MG in Amsterdam, place and number of registration: Trade Register of the Chamber of Commerce and Industry for Amsterdam, no. 33031431) has been investigated and therefore, we hereby inform you of the related decision and as well as our point of view:

Short description of the complaint: _____

Result of the complete investigation of the complaint and decision related to the complaint: _____

Measures made for the settlement or solving of the complaint: _____

Justification / reason of the refusal in case the complaint is refused (reference to the accurate text of the contractual terms or policy, the settlements sent to the Client, other information provided to the Client during the contractual relationship): _____

If you qualify as a consumer and the complaint is refused, we inform you that the complaint and the complaint handling in our opinion is aimed at:

¹ Please make to the appropriate category!

- ¹ a) the settlement of a legal dispute regarding the concluding, validity, legal effects and termination, furthermore the breach and legal consequences of a breach of the contract; or
- ¹ b) the investigation of the infringement of the provisions relating to consumer protection pursuant to Act CXXXIX of 2013 on the National Bank of Hungary.

If you qualify as a consumer and the complaint is refused, we hereby inform you that

- a) in case of Sub-section a) above, you may turn to the Financial Conciliatory Body (contact details: mailing address: H-1525 Budapest BKKP Pf. 172, telephone: +36 1-4899-100, e-mail: pbt@mnbb.hu), or the competent Court in accordance with the rules of the Code of Civil Procedure;
- b) in case of Sub-section b) above, you may initiate a consumer protection supervision procedure of the National Bank of Hungary (contact details: mailing address: 1534 Budapest BKKP Pf. 777, telephone: + 36 1-4899-100, e-mail: ugyfelszolgalat@mnbb.hu).

If, in the opinion of the Bank, the complaint is affected both by Sub-clause a) and b) above, we hereby inform you that the following part of the complaint belongs under the scope of Sub-clause a): _____ and the following part of the complaint belongs under the scope of Sub-clause b): _____, and consequently, you may turn to the authority or body with the relevant part of the complaint as defined above.

If you not qualify as a consumer and the complaint is refused, we hereby inform you that you may turn to the competent Court with the complaint in accordance with the rules of the Code of Civil Procedure.

Budapest, _____

ING Bank N.V. Hungary Branch
acting on behalf of ING Bank N.V.