G.A.P. VASSILOPOULOS PUBLIC LTD

COMPLAINTS POLICY FOR THE WESTERN UNION OPERATION

1. Complaints Received Directly by G.A.P. Vassilopoulos

How We Handle Your Complaint

G.A.P. Vassilopoulos is committed to handling customer complaints fairly, efficiently and transparently. We aim to resolve concerns promptly, ensure that complaints are properly investigated and use customer feedback to identify opportunities for improving our services.

Making a Complaint

G.A.P. Vassilopoulos acts as a point of contact for customer complaints relating to Western Union transactions conducted through its agent network.

Customers may submit complaints directly to G.A.P. Vassilopoulos by telephone at 22710400 or by email at westernunioncy@gapgroup.com. Customers may also choose to submit their complaints directly to Western Union through its official customer service channels.

Upon receipt of a complaint, G.A.P. Vassilopoulos will acknowledge receipt (provided a valid email address is provided by the customer) in writing, confirming that the complaint has been registered and will be reviewed.

All complaints received by G.A.P. Vassilopoulos are recorded in the internal Complaint Register and referred to Western Union where further investigation is required.

Where a complaint requires information or documentation that is not available in G.A.P. Vassilopoulos' records, Western Union will be contacted to provide the necessary information to facilitate the investigation and resolution of the complaint.

Complaint Handling Timeframes

- In accordance with Section 100(2)(b)–(c) of the Provision and Use of Payment Services and Access to Payment Systems Law of 2018 (Law 31(I)/2018), as amended, payment service providers must respond to complaints falling within the scope of these provisions within 15 business days of receipt.
- In exceptional circumstances beyond the payment service provider's control, where a final response cannot be provided within 15 business days, an interim written response must be provided to the customer, clearly explaining the reasons for the delay and specifying when the final response will be provided.
- Under no circumstances may the final response exceed 35 business days from receipt of the complaint.

Complaints Procedure

Upon receipt of a complaint, G.A.P. Vassilopoulos will record the complaint details in its internal Complaint Register and refer the matter to Western Union where further investigation is required.

Western Union's Complaints Team is responsible for investigating escalated complaints, gathering relevant information and issuing acknowledgement letters, progress updates (where applicable) and final resolution letters directly to customers.

G.A.P. Vassilopoulos will monitor complaints received through its channels, follow up with Western Union where necessary and maintain accurate records of relevant communications, actions taken and complaint outcomes.

Communication of Complaint Responses

All formal complaint responses, including acknowledgements, progress updates where applicable, and final resolutions, shall be communicated to customers in writing or through another agreed way, such as email.

Verbal communication may be used to provide additional explanations or updates; however, it shall not replace the formal written response. Copies of relevant customer communications shall be maintained in G.A.P. Vassilopoulos' Complaint Register or associated complaint records.

Complaint Recording, Responsibilities and Oversight

G.A.P. Vassilopoulos' Customer Service Department is responsible for receiving and registering complaints submitted directly by customers or through its sub-agent network.

All complaints received by G.A.P. are recorded in the internal Complaint Register, which includes the following information:

- Complaint reference number
- Date complaint received
- Contact details
- Transaction reference number
- Transaction date
- Sub-agent details
- Complaint description
- Actions taken
- Complaint status
- Elapsed days
- Resolution and closure date

The Customer Service Department is responsible for monitoring outstanding complaints, following up with Western Union where necessary and documenting all relevant communications and actions taken until the complaint is resolved.

Relevant Operations and Compliance personnel shall assist the Customer Service team with the investigations.

The Complaint Register shall be reviewed periodically by the responsible manager to ensure timely complaint handling, identify recurring issues and address any operational weaknesses.

2. Complaints Received Directly by Western Union

Customers may also submit complaints directly to Western Union through its official customer service channels, including telephone, email, online chat or written correspondence.

Complaints submitted directly to Western Union are handled in accordance with Western Union's established EEA Complaints Handling Process.

Western Union is responsible for registering, acknowledging, investigating, escalating and responding to complaints received through its own channels, in accordance with its applicable procedures and regulatory obligations.

G.A.P. Vassilopoulos does not have automatic access to or visibility of complaints submitted directly to Western Union. Consequently, such complaints are not recorded in G.A.P.'s internal Complaint Register unless Western Union refers the complaint to G.A.P. or otherwise provides relevant complaint information.

Where Western Union requests information or assistance from G.A.P. in connection with a complaint, G.A.P. will cooperate and provide the relevant information available within its records. Any such referral or request received by G.A.P. will be documented appropriately.

Western Union EEA Complaints Handling Process Summary

1. Complaint Intake

Complaints can be received through phone (800 950 38), email (cyprus.customer@wu.com), chat (wu.com/cy), letter (to the applicable WUPSIL or WUIB headquarters), fax, walk-in referrals, agents, authorized third parties acting on behalf of customers, and Ombudsman/ADR channels. Agents follow the International Service Manual, collect relevant information and escalate to Tier 2.

2. Complaint Definition

Any expression of dissatisfaction regarding a Western Union financial product or service, or failure/refusal to provide a financial product or service. Complaints resolved at first contact with Western Union Customer Service are logged as Quick Complaint cases. Otherwise, or where the customer requests a formal complaint, the case is escalated to the Complaints Investigations & Resolutions team (Tier 2).

3. Complaint Escalation Path

- Tier 1: Customer Service Representatives (CSR) — cyprus.customer@wu.com, chat or telephone.
- Tier 2: Complaints Team, SMEs, Team Leads and Operations Managers.
- Tier 3: Executive Resolutions Team (ERT).
- Escalation applies where the complaint is unresolved at first contact, a supervisor is requested, an authorized third party is involved, or legal, media, regulator or Ombudsman escalation is threatened.
- Before escalation, obtain customer and complaint details, MTCN (where available), desired resolution and advise follow-up within 24 hours with a case number.

4. Acknowledgement Timeline

Western Union acknowledges complaints within 5 calendar days. Its acknowledgement includes the reference number, receipt date, responsible team, expected investigation timeframe and any request for additional information.

5. Complaint Investigation

- Gather relevant information and evidence.
- Contact the customer if additional information is required.
- Make up to three contact attempts where information is outstanding.
- Complete case documentation and escalate as required.

6. Resolution Timeline

Western Union's EEA process provides for investigation and resolution within 15 calendar days of receipt, with an extension up to 35 calendar days for complex cases subject to supervisor approval and a customer update explaining the delay and final response timeframe. These are Western Union operational timeframes; the statutory requirements applicable to complaints within the scope of Section 100 of Law 31(I)/2018 must also be observed.

The final response includes the outcome, whether the complaint is upheld, any settlement or proposed resolution, acceptance instructions where applicable and relevant ADR/Ombudsman rights. The case is closed following the final response; it may be reopened if the customer disputes the outcome or supplies further relevant information.

7. Important Contact Information and Process Flow

Tier 1 forwards complaints involving lawyers or solicitors acting for customers to the Executive Resolutions Team.

Complaint received → Tier 1 review → Quick Complaint resolution or escalation → acknowledgement → investigation → final response → case closure.

3. Applicable Legislation and Alternative Dispute Resolution

The handling of complaints relating to payment services in Cyprus is governed by the Provision and Use of Payment Services and Access to Payment Systems Law of 2018 (Law 31(I)/2018), as amended. Section 100 establishes requirements concerning complaint-handling procedures, response timeframes and information about alternative dispute resolution.

Customers must be informed of at least one competent alternative dispute resolution body, including how to obtain further information about that body and the conditions for using its services, where applicable.

G.A.P. Vassilopoulos and Western Union will comply with applicable legal and regulatory obligations in accordance with their respective responsibilities.