Consumer protection rules

Rules for protection, fair and ethical treatment of borrowers

These rules govern the relevant mechanisms and procedures for the protection, fair and ethical treatment of borrowers, which will be observed and executed by EOS Matrix EAD (hereinafter referred to as "the Company") in carrying out its business activities.

I. Objectives, Scope and Principles

Art. 1. (1) For the purposes of these rules, a "borrower" is any natural or legal person against whom the Company has a monetary claim arising from a credit acquired on the basis of an assignment agreement, respectively a loan granted by a credit or financial institution established and operating in the Republic of Bulgaria, as well as any person representing a borrower within the meaning of the Credit Servicers and Credit Purchasers Act (CSCPA).

(2) For the purposes of these rules, a "vulnerable borrower" is any natural person who, due to certain circumstances, including taking into account their solvency, property, income, age, social status, work capacity and indebtedness, is exposed to financial and/or personal losses and does not have a current or future opportunity to settle their obligations.

Art. 2. The provisions of these rules set the following objectives:

1. Ensuring adequate protection of borrowers;
2. Fair and ethical treatment of borrowers;
3. Timely identification of vulnerable borrowers and ensuring special protection for them;
4. Ensuring legality and improving the quality of services;
5. Increasing public trust;
6. Increasing the effectiveness in preventing and eliminating infringements in the Company's activities;
7. Creating guarantees for transparency and accountability in the Company's activities, as well as the possibility of control over it by borrowers, the Company, the Bulgarian National Bank and other control bodies.

Art. 3. (1) These rules apply equally to all borrowers, and no restrictions on rights or privileges based on race, nationality, ethnic origin, gender, origin, religion, education, beliefs, political affiliation, personal and social status or property status are allowed.

(2) At the same time, in carrying out its activities, the Company takes into account that there are vulnerable borrowers who face challenges and obstacles in their lives that put them at a disadvantage compared to other borrowers. Such borrowers need special assistance and attention.

(3) In view of the above, the provisions of these rules establish minimum requirements for the comprehensive responsible treatment of borrowers and communication with them as a framework for the Company's activities, including through the introduction of specific standards for assessing and managing cases of vulnerable borrowers. The aim is to ensure a personalized approach that meets the specific needs and circumstances of each borrower, while ensuring that there are appropriate measures to prevent abuse or

discrimination of different categories of borrowers or of certain individuals, including by avoiding the unjustified privileging of individual borrowers.

(4) In order to bring the rules to the attention of the Company's employees, borrowers and third parties, the rules are provided in the Company's premises in a visible place, and are also published on the Company's website together with the policy for compliance with these rules.

Art. 4. These rules are subject to the requirements of the CSCPA, the consumer protection legislation, the personal data protection legislation, as well as other relevant legal and sub-legal normative acts applicable to the Company's activities. Where such a normative act has introduced stricter requirements towards the Company or broader rights of borrowers, the relevant normative act shall apply directly, without the need to amend these rules.

Art. 5. The main principles that are observed in the implementation of these rules are:

1. Guaranteeing the rights of borrowers and creating effective mechanisms for their protection and management;
2. Rule of law to ensure the effective protection of human rights and the equality of all citizens before the law and protection of personal data of individuals;
3. Fair and ethical treatment of borrowers, including with regard to their financial situation, and where necessary - referring them to consultations on debt repayment and on the protection of their rights or to social services;
4. Good management and taking effective actions when working with borrowers;
5. Comprehensive consideration and fair and effective settlement of relations with borrowers;
6. Equality and non-discrimination - any discrimination in any form is prohibited;
7. Proportionality and respect - each action is tailored to the specifics of the borrower;
8. Protection of vulnerable borrowers through the application of specific measures and actions tailored to the respective case of vulnerable borrower;
9. Transparency and awareness - borrowers are provided with full, accurate and understandable information about obligations, fees and processes.

Art. 6. In their work with borrowers, the Company's employees are guided by the principles of independence, objectivity, competence, responsibility, integrity and confidentiality.

II. Responsibility and Accountability Measures

Art. 7. In carrying out its activities, the Company treats borrowers fairly, and at any time must be able to systematically identify and manage cases involving vulnerable borrowers, as well as monitor and report on the management of such cases.

Art. 8. The members of the Board of Directors and the heads of departments are obliged to inform the employees of the Company regarding the content of these rules and to ensure the compliance of the Company's activities with them.

III. Fair and Ethical Treatment of Borrowers

Art. 9. In carrying out its activities, the Company treats all borrowers with respect, providing them with differentiated treatment and support in the debt collection process, while avoiding situations of discrimination. One of the most important aspects of fair treatment in debt collection is ensuring that communication is conducted carefully and respectfully. This means that all communications, both verbal and written, must be clear, concise and easy to understand, and must be addressed exclusively to the respective borrower. When interacting with vulnerable borrowers, it is also important to avoid the use of jargon or technical terms that they may not be familiar with. It is essential that the Company's employees are patient and empathetic when working with borrowers, as they may require additional support and reassurance, especially if they are identified as vulnerable.

Art. 10. (1) The Company ensures the avoidance in its activities of any false or misleading advertising/marketing of terms and fees for debt collection or other financial terms. The aim is to avoid, respectively eliminate, conditions and contractual clauses that may be harmful to borrowers and are therefore unusual in a standard debt collection process.

(2) The Company's employees should act with a high degree of sensitivity and sense of responsibility and tact. By offering balanced solutions that are economically justified and reasonable for all stakeholders, the Company provides opportunities for its borrowers to settle their obligations. For this purpose, the debt collection processes are adapted individually, offering fair and realistic ways to achieve the economic independence of the borrower, taking into account the individual solvency and specific circumstances.

Art. 11. The Company has no right to claim from a borrower a claim other than the due amount, determined in the borrower's contract with the original creditor, except for claims for its reasonable expenses in the debt collection process.

IV. Measures for Responsible Communication and Relationships with Borrowers

Art. 12. In correspondence and relationships with its borrowers, the Company:

1. Treats borrowers ethically, fairly, with respect for their rights and interests, with sensitivity, tact and a sense of responsibility, and in accordance with applicable law;
2. Conducts correspondence objectively and equally;
3. Acts in good faith, proportionally and with zero tolerance for any discrimination;
4. Remains objective regardless of the level of communication;
5. Conducts correspondence without prejudice;
6. Objectively analyzes the quality of communication and temporarily suspends it in the presence of over-emotionality on the part of the borrower;
7. Uses clear language and provides clear instructions that are easy to follow;
8. Refrains completely from aggressive and misleading practices within the meaning of the Consumer Protection Act, including by providing misleading information, providing clear, accurate, understandable, non-misleading and specific information to each borrower regarding their rights and obligations;

9. Conducts correspondence by phone, in writing or electronically in such a way that this communication is addressed personally to the respective borrower, without becoming public, and also provides borrowers with the opportunity to visit an office of the Company on their own initiative;
10. Refrains from posting notices of borrower's obligations in public places and from contacting third parties who are not borrowers and are not related to the borrower;
11. Prioritizes seeking reasonable debt repayment, including through restructuring before moving to enforcement proceedings;
12. Provides staff who have the necessary competence to service the Company's activities and resolve the relevant cases;
13. Respects and protects the privacy of borrowers;
14. Communicates with borrowers through telephone calls, sending requests/messages/letters in written and electronic form, addressed personally to the borrower, with all forms of communication being carried out and addressed only on weekdays from 07:00 to 20:00;
15. Does not make contact in connection with or about its claims with persons against whom the claims have not been assigned;
16. Does not post notices and information about borrowers' obligations in any form in public places;
17. Strictly complies with applicable law, including the requirements for personal data protection under Regulation (EU) No 2016/679 and the Personal Data Protection Act.

V. Notification of Borrowers

Art. 13. (1) The Company notifies borrowers of the assignment of their obligations by sending a notice signed by the assignor and authorized representatives of the Company. When the Company acts on behalf of and for the account of the assignor, it notifies the borrower of this.

(2) The notice of assignment of claims shall be sent before the first action to collect claims, as well as upon request from the borrower.

(3) The notice of assignment of claims shall be provided to the borrower free of charge, on paper or on another durable medium. For the provision of such a notice, after it has been provided once free of charge, the Company may require payment from the borrower, corresponding to the costs of the Company for the provision.

(4) When the claims have been assigned to the Company by a credit institution within the meaning of the Credit Institutions Act, the notice of assignment of claims must contain the following information:

1. Information on the assignment, including the date of the assignment;
2. Identification and contact details of the Company;
3. Data certifying the issued license of the Company to carry out activities for servicing credits;
4. Contact persons with whom the borrower can contact to obtain detailed information;
5. Information on the borrower's obligation as of the date of sending the notice, containing the type and amount of the claim, its basis, date of maturity of the claim, if declared and known, amounts paid to date - by type, amount and date of payment, and all amounts due, including principal, interest, fees and other expenses, indicating a methodology for calculating the statutory interest or other similar

interest that is charged on the interest-bearing part of the non-performing loan, as of the date of sending the notice;

6. Indication of the applicability of Bulgarian legislation and the law of the European Union in the field of enforcement of contract law, consumer protection, borrowers' rights and criminal law after the assignment of the claim;
7. The purposes for which the personal data of the borrower are processed and the legal basis for their processing;
8. The type of personal data of the borrower being processed;
9. The period for storage of personal data or the criteria to be used to determine this period;
10. The existence of the right of access, rectification, erasure and portability of personal data;
11. The existence of the right to restrict the processing of personal data, to object to the processing or to the right to transfer personal data;
12. Name, address and contact details of the competent authorities for submitting a complaint in the Member State in which the borrower habitually resides or in which its registered office is located, or in the Member State in which its central administration is located, when according to national legislation it does not have a registered office;
13. Information on the right to protection in case of expired statute of limitations, unfair terms in the contract with the original creditor and the possibilities for judicial appeal - when the borrower is a consumer.

(5) The notice of assignment of claims must be:

1. Prepared in Bulgarian;
2. Written clearly and understandably, with the terms used being consistent with the terminology adopted in the regulatory framework;
3. In accordance with applicable law;
4. True, complete, non-misleading and non-deceptive, including by not providing information that conceals or obscures essential facts and circumstances;
5. Containing accurate and unambiguous information on the basis of which the borrower can form correct impressions and conclusions about the Company, its activities and its rights and obligations in relation to the Company.

(6) When notifying borrowers, the Company provides information on the possibilities for out-of-court dispute resolution.

(7) Upon written request from the borrower, the Company is obliged to provide him/her with copies of the documents that certify the claim or contain information related to it. Copies of the documents shall be provided free of charge up to four times within one calendar year, and in other cases - against payment corresponding to the costs of the Company for the provision.

VI. Management of Cases Related to Vulnerable Borrowers

Art. 14. When identifying a vulnerable borrower, the personal circumstances of the borrower are taken into account, including his/her solvency, property, income, age, current indebtedness, social and property status, work capacity, etc.

Art. 15. For the identification of vulnerable borrowers, the Company uses the following indicative indicators:

Circumstances	Indicators
Individual	Age; divorce; family members whom the person must support or otherwise assist; death of a loved one, especially of persons from whom the borrower has received maintenance or other assistance; loss of job or work capacity; low level of literacy; presence of "identity theft", presence of other fraudulent acts, etc.
Property Status	Lack of assets; lack of income or recent loss of significant income; over-indebtedness.
Health Problems	Presence of significantly hindering medical conditions - severe disability; incurable disease; severe chronic disease; mental problems/instability; severe addictions; threats of suicide; inability to work, etc.
Social Problems	Single parent with several children; person caring for a person with health problems or in very young or advanced age; homeless person; victim of domestic violence; person with limited capacity; minor, etc.
Exceptional Events	Natural disasters (e.g. earthquakes, floods, fires, hurricanes, cyclones, volcanic eruptions, tsunamis, landslides), nuclear disaster, terrorist attack, epidemics, etc.

Art. 16. The management of cases of vulnerable borrowers follows a structured framework, including the following levels of responsibility:

a) first level - identification of a vulnerable borrower;

b) second level - review of the case, determination of appropriate actions and their undertaking.

Art. 17. (1) Within the first level, an assessment is made for the presence of an individual - a vulnerable borrower. When conducting the assessment, the Company is guided by the indicative indicators, which serve as a guide for analyzing the information received and bringing it to the appropriate category.

(2) If a borrower is not assessed as a vulnerable borrower, the standard debt collection process is followed.

(3) If a borrower is assessed as a vulnerable borrower, the Company collects additional information and evidence to confirm the assessment made. In this case, if not enough evidence is collected, respectively provided, the Company continues with the standard debt collection process. If there is sufficient evidence confirming the presence of a vulnerable borrower, the relevant employee of the Company records this fact, removes the case from the usual processing and signals the case according to Appendix No. 1 - Notification for Vulnerable Borrower, forwarding it to certain employees of the Company from the "Call Center Unsecured

Claims" department, who are specialized in the processing of cases related to vulnerable borrowers and should fulfill the second level of the procedure.

Art. 18. (1) Within the second level, the notification for vulnerable borrower is reviewed by the designated employees from the "Call Center Unsecured Claims" department, who are specialized in working with vulnerable borrowers, who confirm the presence of a vulnerable borrower and identify the relevant measures and actions (e.g. determining financial discounts, individual repayment plans, deferral/postponement of payments, referral to relevant state and social assistance, etc.) to be taken for the proper processing of the case.

(2) In case that upon review of the circumstances and documentation it is established that there is no vulnerable borrower, the case is returned to the relevant responsible employees, who continue with its processing.

(3) In case that there is a vulnerable borrower, the processing of the case continues with increased attention only after taking the relevant decisions for subsequent measures and actions.

(4) As part of the obligations for fair and ethical treatment of borrowers and as part of the measures and actions that are taken to process a case, the Company duly considers the financial situation of the borrowers, providing consultations on the possibilities for debt repayment and on the possibilities for using social assistance and services.

Art. 19. The personal data collected for the vulnerability of a borrower are processed in strict compliance with the legislation on personal data protection (including on sensitive data - medical and other) and the internal rules of the Company.

Art. 20. Cases involving vulnerable borrowers are monitored with increased attention until their proper resolution. All identified cases of vulnerable borrowers must be reported on a semi-annual basis to the Board of Directors, the head of the "Call Center Unsecured Claims" department can take opinions on each case and give additional recommendations for their respective resolution.

VII. Complaints

Art. 21. (1) In case that the Company does not act in accordance with these rules, each borrower has the right to file a free complaint personally or through an attorney, authorized on the basis of a written power of attorney, at the address of management of the Company, located at Sofia 1766, district "Mladost", "Mladost 4", 1 Business Park Sofia Str., building 15, entrance A, 4th floor, or at the following electronic address: InfoBG@eos-matrix.bg. Information on the Rules for Registration and Review of Complaints Received from Borrowers is available on the Company's website at the following address: https://bg.eos-solutions.com/customers/customer-complaint-rules, as well as in a visible place in the Company's premises.

(2) Each complaint filed on the basis of these rules shall be administered and reviewed in accordance with the procedure of the Company for administering and reviewing complaints.

Art. 22. In the cases provided for by law, complaints and any other documents (applications, claims, objections, etc.) may be directly addressed to the competent supervisory authorities in the Republic of Bulgaria, including the Bulgarian National Bank, the Consumer Protection Commission and the Commission for Personal Data Protection, the courts, etc. Regardless of this, each borrower may file a complaint with the Company against any action or inaction, performed, respectively not performed within the relations between this borrower and the Company.

VII. Additional Provisions

§ 1. Amendment and supplement of these rules shall be carried out in the order of their adoption.

§ 2. These rules are reviewed at least once a year and amended in a timely manner when necessary by a decision of the Board of Directors on the proposal of the head of the "Call Center Unsecured Claims" department.

§ 3. An integral part of these rules is Appendix No. 1 - Notification for Vulnerable Borrower.

§ 4. These rules were adopted on 15/12/2025 by the Board of Directors of the Company.

Appendix No. 1 - Notification for Vulnerable Borrower

When establishing a case of a vulnerable borrower, the responsible employee in the Company sends to the "Call Center Unsecured Claims" department structured information, which must contain the following findings:

- Date of establishment of the case;
- Identification data of the vulnerable borrower;
- Information about the obligations;
- Acquisition balance;
- Total balance;
- Reasons for determining the borrower as vulnerable;
- Evidence certifying the presence of a vulnerable borrower;
- Recommended actions for resolving the case;
- Expected financial impact of the measures taken.
- Circumstances and indicators of vulnerability:

Circumstances	Indicative Indicators
Individual	Age; divorce; family members whom the person must support or otherwise assist; death of a loved one, especially of persons from whom the borrower has received maintenance or other assistance; loss of job or work capacity; low level of literacy; presence of identity theft, presence of other fraudulent acts, etc.
Property Status	Lack of assets; lack of income or recent loss of significant income; over-indebtedness.

Health Problems	Presence of significantly hindering medical conditions - severe disability; incurable disease; severe chronic disease; mental problems/instability; severe addictions; threats of suicide; inability to work, etc.
Social Problems	Single parent with several children; person caring for a person with health problems or in very young or advanced age; homeless person; victim of domestic violence; person with limited capacity; minor, etc.
Exceptional Events	Natural disasters (e.g. earthquakes, floods, fires, hurricanes, cyclones, volcanic eruptions, tsunamis, landslides), nuclear disaster, terrorist attack, epidemics, etc.