COMPLAINT HANDLING PROCEDURE

SHARES FINANCIAL ASSETS

Version	Initiated	Comment	Approval	Date of Approval
Version 1	Nicolas Negrilic	Initial version	Benjamin CHEMLA	26/06/2023
Version 2	Nicolas Negrilic	Annual review	Benjamin CHEMLA	03/06/2024
Version 1	Audrey PETIT	Adding MICA requirements	Benjamin CHEMLA	25/06/2026

1. Introduction and Applicable Regulations

Shares Financial Assets ("SFA", "we", "us"), as a licensed Investment Firm and Crypto-Asset Service Provider under the MICA regulation, is subject to the applicable regulations regarding complaint handling.
This complaint handling procedure for investment and digital asset services applies to past, present, and prospective clients.

This therefore requires the implementation of an efficient and transparent procedure to handle any complaint submitted by a past, present, or prospective client promptly and reasonably.

Regulatory references:
Delegated Regulation (EU) 2017/565, Article 26.
AMF Instruction DOC-2012-07 - Handling of complaints
Delegated Regulation (EU) 2025/294
MICA Regulation 2023/1114

2. Definition

- MiFID II definition for investment services

A complaint is defined as any statement expressing dissatisfaction with Shares, regardless of who is contacted. It may originate from any person with a legitimate interest, including in the absence of a contractual relationship with the professional: clients, former clients, holders of financial securities, anyone who has requested SFA to provide a product or service or who has been solicited by SFA, including agents and beneficiaries.

A request for information, advice, clarification, service, or performance is not a complaint.

- MICA Definition for Digital Asset Services

A complaint is the action by which an SFA client or potential client, as a PSCA (Professional Service Provider), informs SFA of their dissatisfaction with the provision of one or more crypto-asset services.

3. <u>Complaint Submission Procedures</u>

The client can submit a complaint to SFA for investment services or crypto-asset services free of charge through several channels:
A complaint form will be available on the Shares website, allowing the client to submit a complaint.

Field 1: Select Region (Countries where investment and crypto-asset services are available)
Field 2: Select Language (French or English)

1a) Claimant Information

Field 3: Name/Legal Name
Field 4: National Registration or Identification Number
Field 5: LEI (if available)
Field 6: Residential or Registered Office Address
Field 7: Postal Code
Field 8: City
Field 9: Country
Field 10: Telephone Number
Field 11: Email Address

1b) Contact Details if different from above

Field 3: Name/Legal Name
Field 4: National Registration or Identification Number
Field 5: LEI (if available)
Field 6: Residential or Registered Office Address
Field 7: Postal Code
Field 8: City
Field 9: Country
Field 10: Tel
Field 11: Email

2a) Legal Representative Information

Field 3: Name/Legal Name
Field 4: National Registration or Identification Number
Field 5: LEI (if available)
Field 6: Residential or Registered Office Address
Field 7: Postal Code
Field 8: City

Field 9: Country
Field 10: Tel
Field 11: Email

2b) Legal Representative Contact Details if different from above

Field 3: Name/Legal Name
Field 4: National Registration or Identification Number
Field 5: LEI (if available)
Field 6: Residential or Registered Office Address
Field 7: Postal Code
Field 8: City Field 9: Country
Field 10: Tel
Field 11: Email

3. Claim Information

3a) Full reference of the investment or crypto-asset service to which the claim relates (name of provider, transaction reference, etc.)
3b) Description of the subject of the claim
Please provide supporting documentation
3c) Dates and expenses giving rise to the claim
3d) Description of damages, losses, or harm caused
3e) Other relevant remarks or information
Created at (location), on (date)

SIGNATURE OF CLAIMANT / LEGAL REPRESENTATIVE OF CLAIMANT

Documents provided (please check the relevant box):

- Power of attorney or other official document proving the designation of the legal representative
- Copy of the contractual documents for the investments to which the claim relates
- Other supporting documents

- Submit by email to the generic email address complaints@shares.io
- As a last resort, you can also contact us by mail at the following address: 6 rue Abel Truchet, 75017 PARIS.

- A complaint may be indirectly raised through the Support team's customer communication channels. In this case, the Support team should ask the customer to submit the complaint via one of the channels indicated above, such as the InterCom chat, for better traceability.

- If a solution is available from Shares customer service, Shares will offer to initiate and process the complaint free of charge.

Conditions for the admissibility of the complaint:

- Information the complainant must provide:

- Submit the complaint in an official language used on Shares or in an official language of the originating or host Member State
- Submit the complaint with all the information requested in the form above

- Conditions that help resolve the complaint more quickly:
- Submit the complaint as soon as possible
- Be responsive if further information is requested
- Keep copies of all relevant documents, such as letters, emails, and notes from conversations with Shares

Complaint submissions through the form will also go to complaints@shares.io and the same Google Sheet for audit trail purposes.

4. Acknowledgement of receipt

- For Investment services : According to the AMF instruction DOC 2012-07, Shares (Support team) will acknowledge receipt within 10 business days of the complaint being sent, regardless of the department concerned, via email from complaints@shares.io for complaints submitted via the form, or by mail upon the client's express request.

- For crypto-asset services : According to the EU regulation 2025/294, Shares will acknowledge receipt within 10 business days maximum of the complaint being sent via email from complaints@shares.io for complaints submitted via the form, or by mail upon the client's express request. Applying a maximum processing time of 10 business days to crypto-related complaints is compatible with the "without undue delay" requirement, given your actual handling capacity.

- This acknowledgement of receipt will include the identity and contact information of the responsible party or the complaints department: complaints@shares.io for complaints and the postal address 6 rue Abel Truchet, 75017 Paris, for complaints submitted by mail.

- The acknowledgement of receipt will include a copy of the complaint itself when it was submitted via the online form.

Email/Letter Template:

« Dear Sir/Madam,
We acknowledge receipt of your complaint regarding the XXXXX service.
We will review your complaint promptly.
We will send you a response within two months of receiving your complaint. This response will address your complaint and outline alternative options.
We will keep you informed of the progress of your complaint if, due to exceptional and duly justified circumstances, the deadlines cannot be met. We will inform you of the reason for this delay and the date on which the decision will be issued.
If you have any questions regarding our decision or process, please do not hesitate to contact us by email at complaints@shares.io or by mail to Shares Financial Assets, 6 rue Abel Truchet, 75017 Paris, France.
We would be happy to provide further explanations and explore alternative solutions.
Sincerely,
The Shares Team"

5. **Final Response Procedure for Complaints**

- Deadline: Shares (Support team) will ensure a response within two months of receiving the complaint.

In the event of a delay in providing a response to the client, Shares is required to state the reasons for the delay.

- In the event of a delay in providing a response to the client, Shares is obligated to inform the client of the reasons for the delay and the date on which a final resolution will be provided.
- The final response will be sent by email from complaints@shares.io for all complaints sent by the form or by mail upon the client's express request.

Response Template:

« Dear Sir/Madam,
Please find attached our response to your complaint of XX/XX/XXXX concerning the XXXX service.

(Respond to each point of your complaint in chronological order.)

If you are still not satisfied after receiving the expected resolution, you may, without delay or in any event within two months of sending your initial complaint to Shares, contact the mediator of the French Financial Markets Authority (AMF) either via the

form available on the AMF website
https://www.amf-france.org/fr/le-mediateur-de-lamf/votre-dossier-de-mediation/vous-voulez-deposer-une-demande-de-mediation or via the QR code below for direct access to the form

or by mail to 17 place de la Bourse, 75082 Paris Cedex 2. The mediator is the last resort." amicably before taking legal action.

The Shares team”

6. **Procedures in case the client deems the response unsatisfactory**

If the client is dissatisfied with the initial response, they may contest Shares' decision. Shares has several solutions:

Option 1: Either find an alternative solution to satisfy the customer or potential customer by providing a different response.

Response Template:

« Dear Sir/Madam,
Please find attached our response to your feedback following our reply to your complaint of XX/XX/XXXX concerning service XXXX.

(Response to be provided point by point in the reply following Shares' response to the customer's complaint.)

If you are still not satisfied after receiving the expected resolution, you may, without delay or in any event within two months of sending the initial complaint to Shares, contact the mediator of the French Financial Markets Authority (AMF) either via the form available on the AMF website
https://www.amf-france.org/fr/le-mediateur-de-lamf/votre-dossier-de-mediation/vous-voulez-deposer-une-demande-de-mediation or via the QR code below for direct access to the form

or by mail to 17 place de la Bourse, 75082 Paris Cedex 2.
The mediator is the last resort for an amicable resolution before initiating legal proceedings.

The Shares Team"

Option 2: Or contest the client's dissatisfaction by clearly stating the reasoning behind Shares' decision and referring the matter back to the AMF mediator.

Response Template:

« Dear Madam/Sir,
Please find attached our response to your feedback following our reply to your complaint of XX/XX/XXXX concerning the XXXX service.
We regret to inform you that we cannot offer you an alternative solution to the one initially proposed in our reply of XX/XX/XXXX.
If you are still not satisfied after receiving the expected resolution, you may, without delay or in any event within two months of sending your initial complaint to Shares,

contact the mediator of the French Financial Markets Authority (AMF) either via the form available on the AMF website https://www.amf-france.org/fr/le-mediateur-de-lamf/votre-dossier-de-mediation/vous-voulez-deposer-une-demande-de-mediation or via the QR code below, which provides direct access to the form

or by mail to the address 17 place de The Stock Exchange, 75082 Paris Cedex 2.

The mediator is the last resort for an amicable resolution before initiating legal proceedings.

The Shares Team"

7. <u>Complaint Handling Procedures (Register, Recording)</u>

All complaints, along with their related correspondence, are logged and archived by us using an automated and/or secure system.

Complaints submitted by email or by mail with scan are logged in a Google Drive.

The system retains this information for a minimum of 5 years from the date the complaint was sent.

Shares maintains a complaints register that collects the following data:

- Date the complaint was sent
- Date the complaint was received
- Date of acknowledgment of receipt
- Date of resolution by Shares
- Subject of the complaint

- Channel used
- Description of the complaint
- Resolution of the complaint
- Date and Response 2 from the complainant
- Date and Response 2 from Shares
- Date the complaint was closed

8. <u>Reporting Procedures</u>

This policy is reviewed annually by SFA's Compliance department.

First- and second-level controls are implemented annually.

The governing body, specifically the Supervisory Board, reassesses the effectiveness of the implemented systems each year.
This reassessment is based on an analysis of the quality of the system put in place, the description of malfunctions, breaches of regulations or bad business practices, particularly through complaints and corrective measures envisaged or implemented.

This policy is summarized on the Shares website as shown below.

"Shares is committed to ensuring your satisfaction with the quality of its services. If a solution provided by Shares Customer Service does not satisfy you, you are offered a free formal complaint process. You can file this type of complaint in the language you normally use on Shares, or in the official language of the EU jurisdiction where you reside.

Please be sure to include the following:
- Your contact information, including that of a legal representative (if applicable);
- Detailed information about the reason for your complaint;
- Relevant supporting documents;
- How you believe the issue can be resolved satisfactorily.

Help us resolve your complaint faster:
- File your complaint as soon as possible;
- Promptly provide any further information requested;
- Keep copies of all relevant documents, such as letters, emails, and notes from your conversations with Shares.

Next Steps :

We review and process each complaint quickly. Within ten business days maximum of receiving your complaint, a complaints manager will send you an acknowledgement of receipt.

Our customer service team will send you a resolution email within two months of the complaint submission date. This decision will address your complaint and outline alternative options. If you have any questions about our decision or process, please don't hesitate to contact us. We'd be happy to provide explanations and consider further action.

If a final response cannot be provided within two months of receiving the complaint due to exceptional circumstances beyond our control, we will inform you within that timeframe, explaining the reason for the delay and providing a final deadline.

In some circumstances, we may need to contact you to obtain further information about your complaint (including additional information to help us process it). We will then do our best to get back to you promptly. Submit your complaint by Mail.

If you are unable to use the online form, you can submit a complaint by email to complaints@shares.io or in writing to the following address: Shares Financial Assets, 6 rue Abel Truchet, 75017 PARIS.
Please include all required information.

Download the complaint form.

All complaints received, along with related correspondence, are recorded and archived by us using an automated system.
The system retains this information for a minimum of five (5) years from the date your complaint was submitted.

After receiving our final resolution:
If you are still not satisfied after receiving the resolution, you may escalate your complaint without delay, or in any event within two months of sending your initial complaint to Shares, to the mediator of the French Financial Markets Authority (AMF), either via the form available on the AMF website. https://www.amf-france.org/fr/le-mediateur-de-lamf/votre-dossier-de-mediation/vous-voulez-deposer-une-demande-de-mediation or via the QR code below for direct access to the form

or by mail to the address 17 place de The Stock Exchange, 75082 Paris Cedex 2.

The mediator is the last resort for an amicable resolution before initiating legal proceedings.

9. **Training**

All employees have an annual training.
Specific training is provided to support during the onboarding at Shares for 3 days. Quality Checks are performed by the managers of the support team monthly in order to improve the team.

10. **Review**

The complaint handling process is approved and monitored by the CEO, Benjamin CHEMLA, by a formal approval by email. .

This procedure is reviewed annually by the RCSI and by the Conseil de Surveillance.

The reporting submitted to the Supervisory Board every quarter includes minimum the following indicators :

- Number of claims in the quarter
- Percentage of claims processed within the time limits
- Number of claims processed within the time limits
- Number of claims processed outside regulatory deadlines
- Number of claims per object
- Results of first-level, second-level and third-level controls (quantitative result, anomalies, action plans)
- Developments in the procedure regarding the processing of claims, regulatory developments affecting the processing of claims.

Reviews of policies and procedures are tracked in procedures stored within a Google Drive.

Review validations are done by mail and filed in a dedicated Google Drive.

Reports submitted to the governing body are tracked via Supervisory Board PVs stored in a Google Drive.

Second-level controls are implemented annually by the Compliance Officer to ensure that the complaints handling policy is correctly implemented.

Third level controls are conducted every two years on the complaint handling process. Shares has a derogation to the annual frequency for this control from the CEO from 19/06/2026 and the Conseil de Surveillance from 25/06/2026.
This derogation may be questioned in case of sharp increases in the number of claims concerning services on crypto-assets (+ 50%) compared to the number of claims in 2025, in case of significant increase in the number and amounts of transactions but also in case of incidents concerning traffic claims.