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## **PROCEDURE FOR COMPLAINTS HANDLING**

**METASWAP sp. z o.o.**

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## VERSION CONTROL

Version	Version Description	Author	Reviewer	Date Approved	Description
1.0	Creation of Policy & Procedure				Initial creation of document

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## 1. INTRODUCTION

- 1.1. This Complaint Handling Procedure has been developed to comply with the provision of Article 71 of Regulation (EU) 2023/1114 of the European Parliament and of the Council on Markets in Crypto-Assets ("MiCA")<sup>1</sup>. It also takes into consideration the regulatory technical standards issued by the European Securities and Markets Authority (ESMA) and the European Banking Authority (EBA), which further specify the requirements for the complaint management framework.
- 1.2. **METASWAP sp. z o.o.**, a company registered in the Republic of Poland with registration number 0001143298, with its registered address at ul. STANISŁAWA PRZYBYSZEWSKIEGO 91-99/15, 93-126, ŁÓDŹ, Poland (hereinafter referred to as the "Company"), has adopted this Procedure as part of its commitment to ensuring transparency, protecting customer rights, and maintaining high standards of financial security. In its activities within the cryptoasset market, the Company adheres to the principles of operational resilience, customer protection, and regulatory compliance.
- 1.3. The Company is committed to providing effective, professional, and client-oriented services. The purpose of this document is to establish a clear and structured framework for responding to any communication received from the Company's clients, including but not limited to formal complaints.
- 1.4. To ensure a fair, transparent, and legally compliant complaint handling process, the Company has implemented and maintains a Complaint Handling Procedure (hereinafter referred to as the "Procedure") that incorporates all elements required by applicable legislation, including MiCA and related technical standards. This procedure is designed not only to ensure regulatory compliance, but also to promote client satisfaction and continuous improvement of services.
- 1.5. This Procedure constitutes an integral part of the Company's internal control system and overall operational governance. It reflects the Company's commitment to building long-term trust with its clients and fulfilling the expectations of all stakeholders, including regulators and business partners.
- 1.6. In monitoring and reviewing complaints, the Company conducts thorough analyses of each case to identify the root causes and recurring patterns. Special attention is given to whether such root causes may also impact other products, services, or internal processes not directly referenced in the complaint. Where necessary, the Company takes appropriate corrective actions to mitigate risks and improve its operations and service quality.

## 2. DEFINITIONS

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<sup>1</sup> Regulation (EU) 2/1114 of the European Parliament and of the Council of 31 May 2023 on markets in crypto-assets. (2023). Official Journal of the European Union. Retrieved from <https://eur-lex.europa.eu/eli/reg/2023/1114/oj/eng>

- 2.1. **MiCA (Markets in Crypto-Assets Regulation)** - Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023, which introduces a harmonized legal framework for the issuance, public offering, and provision of services related to crypto-assets within the European Union. MiCA establishes prudential, governance, disclosure, and investor protection requirements for crypto-asset service providers (CASPs), aiming to mitigate systemic risks, enhance financial stability, and stimulate responsible innovation in the digital finance ecosystem.
- 2.2. **Complaint** - Any expression of dissatisfaction, whether justified or not, received from a Client or third party, relating to the provision of a service or product by the Company, or the conduct of the Company's personnel, agents, or systems.
- 2.3. **Client** - A natural or legal person who uses or has used the services of the Company, including prospective clients whose relationship has not yet resulted in a concluded agreement.
- 2.4. **Complaint register** - A secure, structured, and access-controlled electronic record maintained by the Compliance Officer, where all received Complaints are systematically logged along with details regarding their nature, status, and resolution.
- 2.5. **Head of the Client Service Department** - The Company's officer responsible for managing the team that directly interacts with clients. This person ensures that client communications are handled in accordance with regulatory standards and oversees the intake, initial processing, and resolution coordination of Complaints.
- 2.6. **Client Service Department Manager**- A designated employee responsible for the day-to-day oversight of the Client Service Department. This person ensures that complaints are logged, tracked, and escalated appropriately and supports compliance with the Complaint Handling Procedure.
- 2.7. **Compliance Officer** - The individual responsible for ensuring that the Company's operations, including Complaint handling, remain fully compliant with applicable laws, regulations, and internal policies. This officer also advises management on regulatory changes and coordinates interactions with supervisory authorities.
- 2.8. **Complainant** - Any natural or legal person, or organizational unit with legal capacity, who submits a Complaint to the Company in connection with its services, products, or operations.
- 2.9. **Supervisory Authority**- The Komisja Nadzoru Finansowego (KNF), or any other competent national or EU authority responsible for overseeing the Company's activities in accordance with MiCA and other relevant legislation.

### 3. COMPLAINT REGISTER AND RECORD KEEPING

- 3.1. The Company shall maintain a centralized Complaint Register that records all complaints received, whether submitted in writing, electronically, or verbally, in accordance with the applicable regulatory requirements. The purpose of the Register is to ensure that every complaint is documented, tracked, and addressed in a timely and consistent manner.

3.2. The Head of the Client Service Department is designated as the person responsible for maintaining and updating the Complaint Register. This includes ensuring that all relevant data regarding each complaint is accurately recorded, such as:

- (i) Date of receipt of the complaint;
- (ii) Name and contact information of the complainant;
- (iii) Description of the complaint and the issues raised;
- (iv) The Company representative handling the complaint;
- (v) Actions taken during the investigation;
- (vi) Final resolution and the date of the resolution;
- (vii) Any corrective or preventive actions undertaken.

3.3. In addition, the Client Service Department Manager is responsible for:

- (i) Ensuring that all supporting documentation related to each complaint is collected, stored, and kept in an organized and accessible manner;
- (ii) Verifying that all documents and records are up-to-date and compliant with internal procedures and regulatory requirements;
- (iii) Ensuring proper access control and data protection measures are applied to complaint records.

3.4. All records, including the Complaint Register and supporting documentation (e.g., correspondence, investigation notes, internal reports), shall be retained in a secure and confidential manner for a minimum period of six (6) years from the date of receipt of the complaint. These records must be readily available for review by competent authorities upon request.

3.5. The Company applies data protection and confidentiality measures in accordance with the General Data Protection Regulation (GDPR) and relevant local legislation. Access to the Complaint Register and related documentation is restricted to authorized personnel only. Personal data included in the complaints shall be processed solely for the purposes of investigation, resolution, and compliance.

3.6. Upon request from competent supervisory authorities, the Company shall provide access to the Complaint Register and all related documentation, ensuring full cooperation and transparency in line with MiCA requirements and applicable legal obligations.

3.7. The Complaint Register shall be reviewed periodically by the Compliance Officer to:

- (i) Verify compliance with legal and regulatory standards;
- (ii) Identify trends or recurring issues that may require systemic improvements;
- (iii) Support the Company's risk management, internal control, and quality assurance processes.

#### 4. PROCEDURES FOR HANDLING COMPLAINTS

4.1. The Company ensures that an up-to-date and comprehensive description of its Procedure, as well as the standard Complaint Submission Template (as set forth in the Appendix to this Procedure), are published on its official website at: <https://www.macpay.io/>. These materials are easily accessible, prominently displayed, and available in a downloadable format compatible with desktop and mobile devices, allowing Clients to access them at any time when using the Company's crypto-asset services. Upon request by a Client or upon acknowledgment of receipt of a Complaint, the Company shall also provide a physical or electronic copy of the Procedure and Template free of charge.

4.2. To ensure transparency and inclusion, the Company publishes the Complaint Handling Procedure and the standard template in all languages in which it markets its services or communicates with Clients. This guarantees that Clients can fully understand and effectively exercise their right to file a Complaint in a language they are comfortable with.

4.3. The Company maintains comprehensive internal documentation of the Procedure. These are communicated to all relevant staff members, particularly those involved in client-facing roles, complaint reception, or resolution.

4.4. Regular and mandatory training sessions are conducted to ensure that employees understand their responsibilities under this Procedure, are aware of how to interact with Clients professionally during the complaints process, and are equipped to escalate complaints appropriately within the organization. Updates to procedures are also promptly communicated through internal communication channels and incorporated into future training materials.

4.5. The Company shall not charge any fees or impose any direct or indirect costs on Clients for the submission, processing, or resolution of a Complaint, regardless of the outcome of the investigation.

4.6. The Company shall acknowledge receipt of a Complaint without undue delay, and in any case within 10 business days from receipt, specifying:

- (i) The name and contact details of the designated complaint handler (if applicable);
- (ii) The unique reference number assigned to the Complaint;
- (iii) The expected timeline for investigation and final response;
- (iv) The Client's rights, including the possibility to escalate the matter if not satisfied.

4.7. Each received Complaint shall be:

- (i) Assigned a reference number;
- (ii) Logged into the Complaint Register without undue delay;

- (iii) Categorized based on the nature of the issue (e.g., operational error, technical failure, product dissatisfaction, regulatory concern, etc.);
- (iv) Marked with the date and channel of submission;
- (v) Assigned to a responsible employee or department for investigation.

4.8. Clients may contact the Company at any time during the complaint investigation process to:

- (i) Request updates on the status of their Complaint;
- (ii) Submit additional documentation or clarifications;
- (iii) Modify or withdraw their Complaint, if desired.

4.9. A final response shall be provided to the complainant within 30 calendar days, unless exceptional circumstances arise that require an extended period.

4.10. All interactions related to the Complaint — including acknowledgments, requests for additional information, and final responses — shall be documented and retained in accordance with the Complaint Register and Record Keeping policy.

4.11. Clients shall receive clear and comprehensible communication throughout the process, including written confirmation of the outcome of their Complaint and any remedies or corrective actions, if applicable.

4.12. The Company provides Clients with multiple accessible and user-friendly channels for submitting Complaints, ensuring that the process is inclusive and does not create unnecessary barriers. A Complaint may be submitted through any of the following channels:

- (i) Email: [dmitrii.mand@macpay.io](mailto:dmitrii.mand@macpay.io);
- (ii) Online form: Available on the Company's official website at <https://www.macpay.io/>;
- (iii) Postal mail: Sent to the Company's registered office at ul. STANISŁAWA PRZYBYSZEWSKIEGO 91-99/15, 93-126, ŁÓDŹ, Poland;
- (iv) In-person delivery: During business hours at the registered office or designated client service location;
- (v) Other digital means (e.g. secure messaging tools or client portal), where applicable.

## **5. MEANS AND LANGUAGE OF COMMUNICATION**

- 5.1. The Company ensures that Clients have free and convenient access to channels for filing Complaints, both electronically and in physical form. The Company does not impose any charges for receiving, processing, or responding to Complaints, regardless of the submission method chosen by the Client.

- 5.2. The Company provides a standard Complaint Submission Template (Annex No. 1 to this Procedure) to facilitate a structured and efficient process. However, the use of this template is optional. The Company shall accept and duly process any Complaint submitted in a free-text format, provided it contains sufficient detail to identify the Client and the issue raised. The absence of a completed template shall not affect the admissibility or handling of the Complaint.
- 5.3. To promote accessibility and ensure Clients can communicate effectively, the Company accepts Complaints submitted in the following languages:
- (i) Languages actively used by the Company in its commercial communication, advertising, website content, and contractual documents;
  - (ii) The official languages of the Member State of origin (Poland) and any host Member States in which the Company provides services, provided such languages are also official languages of the European Union.
- Where necessary, the Company may seek a certified translation of the Complaint to ensure accuracy and completeness for internal processing, but this shall not delay the acknowledgment of receipt or the initial review.
- 5.4. The Company will respond to the Complaint in the same language in which it was submitted, unless otherwise agreed with the Client.
- 5.5. All further communication, including acknowledgments, requests for additional information, interim updates, and final responses, shall be made in a clear, professional, and client-friendly manner, using the same language as the original Complaint whenever reasonably possible.
- 5.6. The Procedure and submission template are made available on its website in all supported languages. Clients may also request a copy of the procedure and/or template via email or at the Company's office.
- 5.7. For Clients who require additional support (e.g., individuals with disabilities, limited digital access, or language barriers), the Client Service Department is available to provide assistance and guidance throughout the complaint process.

## **6. CONFIRMATION OF THE RECEIPT AND VERIFICATION OF ADMISSIBILITY OF THE COMPLAINT**

- 6.1. Upon receipt of a Complaint, the Company shall promptly issue a formal acknowledgment of receipt to the complainant. This acknowledgment shall be sent without undue delay, and in any case, no later than ten (10) business days from the date of receipt. The acknowledgment shall confirm that the Complaint has been registered and is under preliminary review.



- 6.2. Simultaneously with the acknowledgment of receipt, the Company shall verify whether the Complaint meets the admissibility criteria set forth in this Procedure. This includes reviewing whether the Complaint:
- (i) Contains sufficient identifying information about the complainant;
  - (ii) Clearly describes the issue and the affected service or product;
  - (iii) Relates to the Company's activities or obligations;
  - (iv) Was submitted through an accepted channel.
- 6.3. If the Complaint does not meet the required admissibility conditions, the Company shall:
- (i) Notify the complainant without undue delay;
  - (ii) Clearly state the specific reasons why the Complaint was deemed inadmissible (e.g., missing information, lack of relevance, anonymous submission);
  - (iii) Where appropriate, invite the complainant to resubmit the Complaint with the missing information or clarifications, rather than rejecting it outright.
- 6.4. The acknowledgment of receipt sent to the complaint shall contain all of the following elements:
- (i) The identity and contact information (email address and telephone number) of the person or department responsible for handling the Complaint and to whom further inquiries may be directed;
  - (ii) The date of receipt of the Complaint, as officially registered in the Complaint Register;
  - (iii) A reference to the Complaint Handling Timeline, which outlines key procedural timeframes, including deadlines for requesting additional information, investigating the Complaint, and issuing a final response;
  - (iv) In cases where the Complaint was submitted using the Company's electronic form, a digital copy of the submitted Complaint shall be included for the Client's reference.
- 6.5. The Company shall ensure that the acknowledgment is written in clear, client-friendly language and includes guidance on the next steps. Where necessary, the Company may offer additional support (e.g., clarification calls, translated explanations) to help the complainant understand the process and what to expect.
- 6.6. All acknowledgments of receipt, admissibility assessments, and related communications shall be recorded and retained in accordance with the Company's Complaint Register and Record Keeping procedure.

## **7. INVESTIGATING THE COMPLAINT**

- 7.1. Upon receipt of an admissible Complaint and after confirming its registration, the Company shall promptly carry out an initial review to assess whether the Complaint is clear, specific, and complete. As part of this review, the Company will determine whether:
- (i) The facts and circumstances are sufficiently described;
  - (ii) Relevant dates, documents, or references are included;
  - (iii) The Client's expectations or desired resolution are clearly stated.
- 7.2. If the Complaint is found to be unclear, ambiguous, or incomplete, the Company shall contact the complainant without undue delay to request any additional information or clarification necessary to enable a proper and fair investigation. The request will be:
- (i) Clear and specific, identifying precisely which details or documents are missing;
  - (ii) Reasonable and proportionate, avoiding any unnecessary burden on the complainant;
  - (iii) Accompanied by a reasonable deadline for submission of the requested information.
- 7.3. The Company undertakes to collect, review, and evaluate all relevant information and documentation necessary for a thorough, impartial, and fact-based assessment of the Complaint. This includes:
- (i) Internal records and communication logs;
  - (ii) Transaction data, contracts, or service logs;
  - (iii) Relevant policies, procedures, and legal obligations;
  - (iv) Communications between the complainant and Company representatives.
- 7.4. To ensure procedural fairness and efficiency, the Company will not request from the complainant any information that is already in its possession or is reasonably expected to be available internally, unless confirmation or client clarification is specifically required.
- 7.5. Each Complaint shall be assigned to a qualified and appropriately senior staff member who is:
- (i) Independent from the subject of the Complaint, where applicable;
  - (ii) Familiar with the relevant processes, products, or services involved;
  - (iii) Trained in complaint resolution and regulatory compliance.
- 7.6. The assigned person or department shall conduct the investigation in accordance with the principles of objectivity, transparency, and timeliness.
- 7.7. Throughout the investigation process, the Company shall:

- (i) Keep the complainant reasonably informed about the progress of the Complaint handling;
- (ii) Respond without undue delay to all reasonable inquiries from the complainant regarding the status or expected resolution timeline;
- (iii) Notify the complainant of any delays or circumstances requiring additional time and provide an explanation with the anticipated timeline for response.

7.8. All investigative actions, findings, and communications with the complainant shall be duly documented and preserved in accordance with the Company's record-keeping obligations. The investigation process shall also be subject to internal oversight and, where applicable, second-level review to ensure procedural integrity and regulatory compliance.

## **8. DECISIONS**

- 8.1. The Company shall issue a reasoned and objective decision regarding each Complaint, addressing all issues raised by the complainant. The decision shall include:
- (i) A summary of the facts established during the investigation;
  - (ii) The legal, contractual, or procedural basis for the resolution;
  - (iii) A clear explanation of how the conclusion was reached.
- 8.2. The outcome must be consistent with previous decisions on similar Complaints to ensure fairness, predictability, and equal treatment of Clients. If a different conclusion is reached compared to similar past cases, the Company must clearly justify the deviation and document the rationale.
- 8.3. The Company shall communicate its decision to the complainant without undue delay, and in any event no later than two (2) months from the date of receipt of the Complaint. The response shall be delivered in writing and in the same language in which the Complaint was submitted, unless otherwise agreed.
- 8.4. In exceptional circumstances where the decision cannot be delivered within the standard timeframe due to complexity, the need for third-party input, or other justifiable reasons, the Company shall:
- (i) Promptly notify the complainant of the delay before the original deadline has expired;
  - (ii) Explain the reasons for the delay in clear and transparent terms;
  - (iii) Provide the complainant with the revised expected date of the final decision.
- 8.5. If the decision: does not fully satisfy the complainant's request, or only partially addresses the issue in favor of the complainant, the Company shall:

- (i) Clearly outline which elements of the Complaint were rejected or not upheld and why;
  - (ii) Reference the evidence and policies supporting the decision;
  - (iii) Inform the complainant of their right to further recourse, which may include:
  - (iv) Submission of the Complaint to an alternative dispute resolution (ADR) body;
  - (v) Lodging a formal complaint with a competent supervisory authority;
  - (vi) Initiating legal proceedings before a court of competent jurisdiction.
- 8.6. Contact details and further guidance on escalation procedures shall be included in the Company's final response to ensure the Client is fully informed of available options.
- 8.7. A Complaint shall be considered formally closed once the final written decision has been communicated to the complainant, and 1) no further communication or challenge is received within a reasonable period, or 2) the complainant confirms satisfaction with the outcome.
- 8.8. The Company shall maintain a complete and secure record of the decision and any related documentation in accordance with its record-keeping obligations.

## **9. DESCRIPTION ON HOW TO REGISTER AND RECORD COMPLAINTS**

- 9.1. The Company has implemented a secure and structured electronic system for the registration, monitoring, and archiving of all received Complaints, in accordance with Article 71(5) of MiCA and Article 1(2)(f) of the applicable Regulatory Technical Standards.
- 9.2. All Complaints are promptly and systematically recorded by the Compliance Officer in a centralized Complaint Register, maintained in a secure and access-restricted digital environment hosted on the Company's [insert cloud platform name] cloud infrastructure. The Register includes key information such as the complainant's full name and contact details, client reference number (if applicable), the product or service involved, the date of receipt, the nature and content of the Complaint, the severity classification (low, medium, or high), and the specific actions taken in response to the issue.
- 9.3. The Complaint Register is protected by technical and organizational measures in line with data protection legislation, including GDPR. Access to the Complaint Register is strictly limited to authorized personnel, namely the Compliance Officer and, where necessary, members of the Management Board. The records are encrypted and stored in a tamper-proof format to ensure confidentiality, integrity, and availability for audit and supervisory review.

- 9.4. The system includes built-in functionality for real-time status tracking of each Complaint, enabling the Company to monitor progress at every stage. This includes confirmation of receipt, which must be sent within ten (10) business days, and issuance of a final written response within thirty (30) calendar days, unless an extension has been communicated in accordance with the Complaint Handling Procedure. All correspondence, documents, and case notes are retained within the system to ensure transparency and accountability.
- 9.5. Furthermore, the Company records and analyzes any corrective or preventive measures implemented as a result of a Complaint. These measures are logged alongside the Complaint to facilitate root cause analysis, process improvement, and risk mitigation. The Compliance Officer is responsible for conducting an annual review of all Complaints received, identifying patterns, underlying causes, and potential weaknesses in internal processes. The results of this analysis form the basis for updating this Procedure, refining internal controls, and improving the overall quality and reliability of the Company's services.

## **10. FINAL PROVISIONS**

- 10.1. The competent supervisory authority for the Company is the KNF, which supervises financial market participants in accordance with applicable Polish and European Union law.
- 10.2. Clients may file a Complaint with the KNF regarding the Company's conduct, particularly if they believe that the Company has violated its regulatory obligations. This right is available to natural persons, legal persons, and other organizational units granted legal capacity under applicable law, including entities that have been denied financial services.
- 10.3. The Financial Ombudsman of the Republic of Poland (Rzecznik Finansowy) is the competent authority for out-of-court resolution of consumer disputes arising from contracts concluded between the Client and the Company.
- 10.4. Detailed information, including instructions on how to initiate proceedings, is available at: [www.rf.gov.pl](http://www.rf.gov.pl), by phone at: +48 22 333 73 25, or via email at: [biuro@rf.gov.pl](mailto:biuro@rf.gov.pl).
- 10.5. The law applicable to all rights and obligations related to the submission, handling, and resolution of Complaints shall be the law of the Republic of Poland, including in cases where Polish courts do not hold jurisdiction over the dispute between the Client and the Company.
- 10.6. Disputes between the Company and the Client shall first be addressed through the Company's internal Complaint Handling Procedure as a form of out-of-court resolution. The Company is committed to resolving issues amicably and fairly.

10.7. If the dispute cannot be resolved out of court, it shall be brought before a court of competent jurisdiction in the Republic of Poland, based on the registered office of the Company. However, if the Client is a consumer and the contractual relationship is not related to their business activity, the dispute shall be resolved by a court of general jurisdiction for the Client, in accordance with Polish civil procedure law.

## END OF PROCEDURE

Document prepared by the Company's AMLRO:



AMLRO Name, surname: Olga Kolodii

Date of Notification: 23.10.2025

AMLRO Contact Number: [+48516205597](tel:+48516205597)

AMLRO email address: [amlro@macpay.io](mailto:amlro@macpay.io)

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## ANNEX 1

<b>COMPLAINT</b>
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### 1. Personal data of the applicant

NAME / LEGAL ENTITY	NAME	REGISTRATION NUMBER	LEI NUMBER (IF AVAILABLE)	CLIENT REFERENCE S (IF AVAILABLE)

ADDRESS: STREET, NUMBER, FLOOR  (in case the applicant is a legal entity, the address of the registered office of the applicant)	POSTAL CODE	CITY	COUNTRY

PHONE		EMAIL	

2. Contact information (if different from 1)

NAME OF LEGAL ENTITY		NAME	
ADDRESS: STREET, NUMBER, FLOOR  (for company headquarters)	POSTAL CODE	CITY	COUNTRY

PHONE		EMAIL	
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3. Personal data of the legal representative (if applicable) (power of attorney or other official document as proof of appointment of the representative)

NAME	NAME / NAME OF LEGAL ENTITY	REGISTRATION NUMBER	LEI NUMBER (IF AVAILAB LE)

ADDRESS: STREET, NUMBER, FLOOR  (If the applicant is a legal entity, the address of the registered office of the applicant)	POSTAL CODE	CITY	COUNTRY

PHONE		EMAIL	
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4. Contact information (if different from item 3)

SURNAME / NAME OF LEGAL ENTITY	NAME

ADDRESS: STREET, NUMBER, FLOOR  (If the applicant is a legal entity, the address of the registered office of the applicant)	POSTAL CODE	CITY	COUNTRY

PHONE		EMAIL	

5. Information on the

5.1. Full information about the issuance, offering or application for admission to trading of asset-linked tokens or the contract to which the Complaint relates (i.e., the name of the issuers of the asset-linked tokens, the reference number of the asset-linked tokens or other references to the relevant transactions).

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5.2. Description of the Subject of the Complaint

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*Please provide documentation confirming the aforementioned facts.*

5.3. Date(s) of occurrence of the facts that led to the filing of the Complaint

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5.4. Description of the harm, loss or damage caused (if applicable)

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5.5. Other comments or relevant information (if applicable)

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W \_\_\_\_\_(place) \_\_\_\_\_(date)

*SIGNATURE*

## COMPLAINANT/LEGAL REPRESENTATIVE

Documentation provided (check the appropriate box):

<i>Power of attorney or other relevant document</i>	
<i>A copy of the contractual documents relating to the investments to which the complaint relates</i>	
<i>Other documents supporting the complaint</i>	

## APPENDIX 2

The table below shows a detailed schedule setting out the deadlines for the various stages of processing the Complaint

Procedure Stage	Maximum Completion Date
Confirmation of receipt of complaint	within 10 working days of its receipt
Requesting additional information from the Client	Within 10 working days from the confirmation of receipt of the complaint
Investigation of the legitimacy and analysis of the Complaint	Up to 10 working days from receipt of complete documentation
Providing an answer to the complaint	Within 30 calendar days of receipt of the complaint (or 60 days in special cases, with notification to the Client)

**With the provision that if the application is incomplete, the processing time may be extended by the period of waiting for the documentation to be completed.**

**All lead times are calculated from the successful delivery of the claim or required information.**