

Title:	Complaints Handling Procedure
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1. Introduction

This Complaints Handling Procedure outlines the course of action for Customer Support and Legal Department when handling complaints submitted by clients using the crypto asset services provided by WEB3 Technology B.V. (hereinafter referred to as "**RGLTD**" or the "**Company**").

2. Purpose and Principles

This Complaints Handling Procedure (the "**Procedure**") is based on:

- (i) Article 71 of Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on Markets in Crypto-assets and amending Regulations (EU) No 1093/2010 and (EU) No 1095/2010 ((hereinafter referred to as "**MiCA Regulation**"); and
- (ii) The European Securities and Markets Authority ("**ESMA**") regulatory technical standards ("**RTS**") on the requirements, templates and procedures for handling complaints.

In line with the objective of Article 71 of MiCA Regulation, this Procedure has the purpose of protecting clients by ensuring that Company clients are informed about the possibility of filing a complaint, how to submit their complaint, and that the Company handles complaints received from clients in a prompt, fair and consistent manner.

For the purpose of this procedure, a complaint means a statement of dissatisfaction addressed to the Company by one of its clients relating to the provision of one or more crypto-asset services provided by the Company. All clients that the Company provides crypto-asset services to are eligible to file a complaint.

The Company makes available to clients a template for filing complaints in accordance with Schedule 1 and the Company keeps a record of all complaints received and any measures taken in response thereto. The Company shall not deem a complaint inadmissible on the sole ground that a client used his or her template complaint instead of any other methods that the Company makes available to them, as an alternative.

Clients shall be able to file complaints free of charge with the Company. The handling of complaints by the Company shall be free of charge for the complainant, ensuring no financial barriers are imposed upon clients.

The Company shall ensure that this Procedure is regularly updated, detailed, and appropriately distributed to all relevant personnel within the Customer Support and the Legal Department. The communication of this Procedure shall be conducted through the Company's internal channels. The Company shall also ensure that employees in these departments receive adequate and ongoing training to ensure a thorough understanding of, and compliance with, the complaint-handling procedures.

3. Roles and responsibilities

This section sets forth the roles and responsibilities of relevant parties as the roles apply to this procedure.

Role:	Responsibility:
Chief Risk & Compliance Officer	- Overall responsibility for the complaints handling process.

Customer Support	- Acknowledgement of receipt of complaint whether the submission meets all formal requirements to be admissible and, if relevant, informing the complainant of any deficiencies or corrective actions needed for the complaint to be considered admissible. - Assessment of the completeness and clarity of the complaint and possible contact with the complainant to obtain additional data or clarification necessary to fully understand the nature of the complaint in order to properly handle the complaint. - Evaluation of the complaint, including preparation of a response to the complaint and issuance of a final decision on the validity of the complaint. - Maintaining a repository of standard responses for frequently encountered complaints. - Systematically monitoring the complaint process. - Maintaining a comprehensive register of all submitted complaints and appeals. - Submitting reports to the Board of Directors regarding the effectiveness of complaints handling and all measures taken in response to complaints.
Legal	- Review complaints that are too difficult for the Support Department to evaluate and preparation of a response that is fully compliant with both applicable legal standards and the Company's policies. - Depending on the nature and difficulty of the complaint, the determination of a specific course of action for its resolution. - Processing of appeals of complaints. - Where appropriate, review and, if necessary, update this Procedure prior to the annual review.
Compliance Officer	- Annual review, opinion and management of procedure review. - Publishing and maintaining an up-to-date description of the procedures for complaints handling on the website.
Board of Directors	- Approve procedure and annual reviews.

Staffing and resources.

While in the previous table the roles and responsibilities are included for involved parties in the Complaints handling process, it is noted that the Company will outsource the Customer Support services in accordance with its Outsourcing agreement and service level agreement in order to ensure adequate (HR) staffing on handling complaints. Furthermore, it is noted that in its initial phase of operations (until a (Dutch speaking) person is recruited/available in RGLTD), the CRCO will be involved hands-on with complaints handling to ensure a smooth and effective process in case NL language is needed.

In the service level agreement, it the Customer Support team is subject to "Handling complaints within satisfaction and timeframes of complaints policy"

Technical resources and tools

The Company will facilitate the complaints process with technical resources as follows:

- E-mail application (for submission and communication of complaints)
- Web application (for submission of complaints)
- End-user computing (Excel), (for registration and monitoring of complaints)

4. Means for Submitting Complaints

Complaints may be submitted through electronic correspondence via the Company's website or designated email address. On the Company's website, specific pages are developed to provide for a web-application submission of complaints. All email complaints must be directed to the Customer Support department via the official email address: support@rgltd.com.

Additionally, complaints may also be submitted in written (paper) form, sent by postal mail to the Company's registered office address Prins Hendrikkade 21 E, 1012 TL Amsterdam.

5. Complaints Submission Process

Complaints may be submitted using the template attached as Schedule 1 to this Procedure. Templates that are fully completed by clients in an Accepted Language are considered admissible complaints and will be handled in accordance with this Procedure.

Complaints that are submitted whilst not using or have fully completed the template attached as Schedule 1 to this Procedure will be considered admissible provided that at least the following information is provided:

- i. Full name of the complainant;
- ii. Email address of the complainant;
- iii. Wallet Address (if applicable);
- iv. Detailed description of the complaint;
- v. Specific demand of the complainant;
- vi. Any relevant supporting documents or evidence needed in order to properly respond to a complaint, which may entail insofar not readily available to the Company:
 - Proof of Payment (in PDF format) if the complaint pertains to a financial transaction;
 - Transaction Hash, if the complaint involves a deposit or withdrawal of crypto assets.

6. Language for Complaints

Complaints may be submitted in any language in which the Company markets its services or communicates with clients or one of the official languages of the EU member states to which the Company has passported their CASP license (each, an "**Accepted Language**").

Dutch, English, or Polish being preferred.

7. Acknowledgment of Receipt

Upon receipt of a complaint, the Customer Support shall promptly, and in any event within 7 days, promptly issue a formal acknowledgment to the complainant, confirming whether the submission meets all formal requirements to be admissible and, if relevant, informing the complainant of any deficiencies or corrective actions needed for the complaint to be considered admissible.

Such acknowledgment of receipt of a complaint shall contain the following: (a) the identity and contact details including email address of the person to whom, or the department to which, complainants can address any query related to their complaint;

(b) the date of receipt of the complaint;

(c) confirmation that the complaint is admissible and if it is not admissible a clear explanation on why it is not admissible;

(d) a reference to the timelines applicable to complaints handling as set out in this Procedure; and

(e) where an electronic complaint is filed, a copy of the complaint filed by the complainant.

8. Initial Review of an Admissible Complaint

Upon receipt of an admissible complaint, the Customer Support handling the complaint shall assess the completeness and clearness of the complaint.

Where the Customer Support concludes that the initial information provided is unclear or incomplete to properly handle the complaint, the Customer Support shall promptly contact the complainant to request any additional data or clarification necessary to fully understand the nature of the complaint in order to properly handle the complaint.

The Customer Support will request the complainant to provide such additional information within 15 days from the date of the request. If the Company does not receive a response from the complainant within 15 days, the Customer Support will send the complainant a reminder request for additional information and provide the complainant with another 7 days to provide the information. If the complainant does not provide the additional information within those timelines and has also not provided a valid reason combined with an expectation as to when the complainant can provide such additional information, the Customer Support will reject the complaint and inform the complainant thereof.

In relation to the above, the Customer Support shall not request information that is already in the Company's possession or that should be in the Company's possession.

9. Evaluation of Complaint

If the Customer Support is of the view that the complaint contains the information required to be able to decide on the complaint, the Company will start the evaluation process.

In its assessment, the Customer Support addresses all points raised in the complaint and will state the reasons for the outcome of the complaint assessment. That decision must be consistent with previous decisions taken by the Company in respect of similar complaints, unless the Company is able to justify why a different conclusion is drawn.

Upon conducting a thorough evaluation of the factual and legal circumstances

surrounding the complaint, the Customer Support shall issue a final decision on the complaint's validity.

In the event of a negative decision, the response must include a detailed explanation of the decision's rationale, as well as information on the available remedies, including the right to appeal the decision. This enables the complainant to take further action if they disagree with the Company's findings.

10. Standardization of Responses

To enhance efficiency and consistency, the Customer Support shall maintain a repository of standard responses for frequently encountered complaints. If a complaint falls outside the scope of standard procedures or cannot be addressed using a pre-existing template, the case shall be escalated to the Legal Department for further review. In such instances, the Legal Department will ensure that the response is fully compliant with both applicable legal standards and the Company's policies.

11. Timely Response

The Customer Support shall provide a substantive response to the complaint within [30] days from its acceptance. Responses will be sent in the same format (electronic or postal) and language in which the complaint was received, provided that the language in which the complainant filed its complaint is an Accepted Language. In exceptional circumstances, where the response period is likely to exceed the stipulated time frame, the Company shall inform the complainant of the reasons for the delay and specify the new expected response date, which shall not exceed [60] days from the initial acceptance of the complaint.

12. Clarity of Communication

The Customer's Support department decision shall be communicated to the complainant in a clear, precise, and easily understandable manner.

13. Further Actions and Remedies

Following a positive decision, the Company shall take the necessary steps to fulfil its obligations towards the complainant in a timely and efficient manner.

The resolution of the complaint may involve a range of actions, including but not limited to, a refund, discount, compensation, or other actions as deemed necessary to meet the complainant's demands.

The specific course of action to resolve a complaint shall be determined by the manager responsible for the Customer Support or Legal Department, depending on the nature and complexity of the complaint.

Complainants may appeal decisions they find unsatisfactory. In the appeal, the complainant is required to present the grounds supporting the reconsideration of the original decision. The appeal's steps and process shall be clearly outlined in the initial decision letter.

Appeals shall be reviewed by the Company's Legal Department, which will thoroughly assess the case based on all relevant facts and documents. The Company shall issue a response to the appeal within 14 days of receiving the appeal, applying the same standards as those used for the initial complaint review.

14. Monitoring of Complaints

The Customer Support shall systematically monitor the complaint-handling process to identify recurring issues and ensure continuous improvement of its services.

The Company shall regularly review the root causes of complaints and implement necessary corrective measures to enhance the quality of service.

The Customer Support shall continuously analyse the following elements:

- The average processing time, for the relevant period under review, for each stage of the complaint handling procedure, including confirmation, investigation, and response time;
- The number of complaints received during the relevant period under review and, for each stage of the complaint process, the number of complaints for which the entity did not meet the maximum deadlines specified in the complaint handling procedure;
- The categories of issues to which the complaints pertain;
- The outcomes of investigations.

The Customer Support shall maintain a comprehensive register of all submitted complaints and appeals. This register must include, at a minimum, the following details: (a) the date the complaint was received, (b) the identity of the complainant, (c) the subject matter of the complaint, (d) a link to the submitted complaint, (e) the date the response was provided, (f) the identity of the person providing the response, (g) the date the appeal was received (if applicable), (h) a link to the submitted appeal (if applicable), (i) the date the response to the appeal was provided (if applicable), and (j) the identity of the person providing the response to the appeal (if applicable).

The Company will keep records of all complaints received, outcome of the complaint assessment and any measures taken in response to complaints for a period of 5 years.

Customer Support employees must prepare reports on the complaint-handling process to analyse statistics, identify trends, and improve customer service.

Based on these reports, The Customer Support must submit reports to the Board of Directors regarding the effectiveness of complaints handling and all measures taken in response to complaints. These reports shall include recommendations for improving service quality and resolving systemic issues.

15. Publication

Compliance Officer will be responsible for publishing and maintaining an up-to-date description of the procedures for complaints handling on the Company's website, as well as the template attached as Schedule 1 to this Procedure, and ensure that both the description and the template are easily accessible on any digital device that may be used by customers to access the crypto-asset services.

The description of the complaints handling procedure and the template will be published on the Company's website in all Accepted Languages.

Document control: approval, review and deviations

This Procedure has been approved by the Board of Directors and is subject to annual review by the Compliance Officer. Deviations from this Procedure are only allowed with prior approval of the Board of Directors.

Should there be significant changes to the organisation or significant legal developments, the Legal Department reviews and, if needed, updates this Procedure prior to the annual review.

Amendments to this Procedure are subject to approval by the Board of Directors of the Company.

16. Version history

Version:	Date of Change:	Revisor:	Summary of Change:
0.1	16.10.2024	Compliance Officer	Baseline document – AFM licence application
1.0	11.03.2025	Compliance Officer	Revised and approved following AFM information request

17. SCHEDULE 1 - COMPLAINTSTEMPLATE

1.a. Personal data of the complainant

LAST NAME/LEGAL ENTITY NAME	FIRST NAME	REGISTRATION ID NUMBER or	LEI (IF AVAILABLE)	CLIENT REFERENCE (IF AVAILABLE)

ADDRESS: STREET, NUMBER, FLOOR (for firms registered office)	POSTCODE	CITY	COUNTRY

TELEPHONE		EMAIL	
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1.b Contact details (if different from 1.a)

LAST NAME/LEGAL ENTITY NAME	FIRST NAME

ADDRESS: STREET, NUMBER, FLOOR (for firms registered office)	POSTCODE	CITY	COUNTRY

TELEPHONE		EMAIL	

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

LAST NAME	FIRST NAME/LEGAL ENTITY NAME	REGISTRATION NUMBER AND LEI (IF AVAILABLE)

ADDRESS:	POSTCODE	CITY	COUNTRY
STREET, NUMBER, FLOOR			

(for firms registered office)			

TELEPHONE		EMAIL	
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2.b Contact details (if different from 2.a)

LAST NAME/LEGAL ENTITY NAME	FIRST NAME

ADDRESS: STREET, NUMBER, FLOOR (for firms registered office)	POSTCODE	CITY	COUNTRY

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TELEPHONE		EMAIL	
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3. Information about the complaint

3.a Full reference of the crypto-asset service or agreement to which the complaint relates (i.e. name of the crypto-asset service provider, crypto-asset service reference number, or other references of the relevant transactions...)

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3.b Description of the complaint's subject-matter

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Please provide documentation supporting the facts mentioned.

3.c Date(s) of the facts that have led to the complaint

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3.d Description of damage, loss or detriment caused (where relevant)

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3.e Other comments or relevant information (where relevant)

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SIGNATURE

COMPLAINANT/LEGAL REPRESENTATIVE

Documentation provided (please check the appropriate box):

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

18. SCHEDULE 2 - QUARTERLY REPORT TEMPLATE

Average processing time, for the relevant period under consideration, for each step of the complaints handling procedure, including acknowledgement, investigation, response time.

	<u>Stage I</u> First response (acknowledgement)	<u>Stage II</u> Evaluation of complaint (investigation)	<u>Stage III</u> Response	<u>Stage IV</u> Appeal
Average processing time				
Remarks				

Number of complaints received, for the relevant period under consideration.

Number of complaints	Remarks

Number of complaints non-compliance with time limits	Remarks

Number of complaints received, for the relevant period under consideration for each step of the complaints handling procedure, the number of complaints where the crypto asset service provider did not comply with the maximum time limits set out in its complaints handling procedure.

	<u>Stage I</u> First response (acknowledgement)	<u>Stage II</u> Evaluation of complaint (investigation)	<u>Stage III</u> Response	<u>Stage IV</u> Appeal
Number of complaints				
Remarks				

Categories of the topics to which complaints relate.

Topic of complaints	Remarks

The outcomes of the investigations in descriptive form. Conclusions that were drawn on the basis of the prepared report. Analysis and presentation of conclusions based on this report, compared to the previous report. Description of

what has been improved in this quarter in relation to previous quarters. A description of what needs to be improved for the next quarter. A summary, including a description of what the efficiency of complaint handling was and what measures were taken to respond to all complaints.