

COMPLAINTS POLICY

1. TERMS USED IN THE COMPLAINTS POLICY

FUMBI	commercial company FUMBI, s. r. o. , registered office: Suché Mýto 6, 811 03 Bratislava - Staré Mesto district, Company ID: 55 651 232, registered in the Commercial Register maintained by the Municipal Court Bratislava III, Section: Sro, File No.: 177108/B.
FUMBI Services	FUMBI provides the following services to its clients: - custody and management of crypto assets on behalf of clients, - exchange of crypto assets for funds, - exchange of crypto assets for other crypto assets, - providing advice on crypto assets, - provision of crypto asset portfolio management, - crypto asset transfer services on behalf of clients, - provision of unregulated services.

2. INTRODUCTORY PROVISIONS.

- 2.1 These Complaints Rules govern the legal relationship between the client and FUMBI based on the filing of a complaint by a client who is dissatisfied, for example, with the timeliness, accuracy or manner of provision of FUMBI Services.
- 2.2 The client has the right to file a complaint free of charge. FUMBI will investigate the complaint free of charge.
- 2.3 The client shall submit the complaint in the language in which official communication takes place in the EU country where the Service is provided. FUMBI shall also communicate with the client in this language.
- 2.4 To file a complaint, the client may use the complaint form attached to these Complaint Rules.
- 2.5 The client has the right to request that FUMBI communicate with them in clear and simple language that is understandable to them.

3. HOW TO SUBMIT A COMPLAINT.

- 3.1 The client may submit a complaint in writing in English:
 - by letter to the company's registered office address - Suché Mýto 6, 811 03 Bratislava - Staré Mesto district, with a note that the letter is intended for the Customer Support and Crypto Advisory Department,
 - by email to the email address: support.sk@fumbi.network,
 - using the dedicated form available on the FUMBI Platform (via the contact form in the complainant's (client's) profile by selecting the Complaints and Comments option).
- 3.2 Each complaint must contain the client's identification data, at least to the extent of:

- first and last name (client FO) or name or business name (client PO, natural person - entrepreneur),
 - date of birth (client FO) or ID number (client PO or natural person - entrepreneur),
 - permanent address (natural person client) or company headquarters, place of business (legal entity client or natural person - entrepreneur);
 - contact details of the client or contact person of the corporate client (e.g. telephone number, e-mail address);
 - LEI legal entity identifier (if available).
- 3.3 If the complaint is submitted in writing on a dedicated form via the FUMBI Platform, the client's registration email or registration number (Fumbi ID) is sufficient identification data; point 3.2 does not apply in this case.
- 3.4 The complainant is also obliged to state the disputed facts clearly and comprehensibly, correctly and accurately in the complaint, together with, for example, dates, numbers and amounts, and to prove their claims in a credible manner, in particular by submitting legally relevant documents (e.g. screenshots, URL addresses, etc.), which they shall obtain at their own expense. The complainant is also obliged to state in their complaint the rights they are asserting against FUMBI.
- 3.5 A client's complaint shall be considered admissible if it meets the following criteria:
- 3.5.1 Formal requirements:
- The complainant is a client who has expressed dissatisfaction, e.g. with the timeliness, accuracy or manner of provision of one or more FUMBI Services, and can be identified without doubt (to the extent of the data specified in points 3.2 and 3.3),
 - The client delivered the complaint to FUMBI in a timely manner.
 - (i) In the case of a complaint relating to the accuracy or completeness of the data in the client's statement (provided for crypto asset portfolio management, custody and administration services on behalf of clients), the client is obliged to deliver a written complaint to FUMBI within 60 days of the date on which the statement was issued.
 - (ii) In the case of a complaint concerning the client's dissatisfaction, e.g. with the timeliness, accuracy or manner of provision of one or more FUMBI Services, the client is obliged to deliver a written complaint no later than 60 days from the date on which the client's instruction could have been or was executed, or the service was provided.
- 3.5.2 Factual requirements:
- The client's complaint is clear and understandable.
- 3.6 FUMBI shall confirm receipt of the complaint to the client in writing within 2 (two) working days of its delivery at the latest. The confirmation of receipt of the complaint shall contain the following information:
- contact details, including the email address and telephone number of the Customer Support and Crypto Advisory Department, to which complainants can address all questions relating to the complaint;
 - the date of receipt of the complaint;
 - a description of the time frame for handling complaints;
 - if an electronic complaint form is submitted, a copy of the complaint.
- At the same time as the written confirmation of receipt of the complaint, FUMBI will deliver the Complaints Procedure to the client.
- FUMBI shall notify the client in writing whether their complaint is admissible within 2 (two) working days of receiving the complaint, unless the procedure under point 3.7 applies.
- 3.7 If a client's complaint is unclear, incomprehensible or incomplete, the employee responsible for investigating the complaint shall, immediately after receiving the complaint, ask the complainant to provide all information or evidence necessary for the proper handling of the complaint within

30 days of receiving the request for additional information. If the client fails to provide the information necessary to investigate the complaint, FUMBI will reject the complaint as inadmissible (FUMBI will notify the client of this fact in its request).

FUMBI does not ask the client to supplement the information that is already available.

No later than 2 (two) working days after the expiry of the deadline for remedying the identified deficiencies, FUMBI shall notify the client in writing whether their complaint is admissible.

- 3.8 The deadline for handling the complaint shall commence on the working day following the notification to the complainant that their complaint is admissible.
- 3.9 Unless the complainant requests another method of providing information, FUMBI shall provide the client with information within the meaning of this point in writing, in the form chosen by the client for the delivery of the complaint (letter, email, form on the FUMBI Platform).

4. TIME FRAME FOR DECIDING ON A COMPLAINT.

- 4.1 If it is not possible to handle the complaint without undue delay, FUMBI shall decide on the complaint within 30 days of notifying the client that their complaint is admissible.
- 4.2 In more complex and technically demanding cases, FUMBI is entitled to conduct a further review of the complaint and a professional assessment of the client's dissatisfaction, whereby the overall handling and decision on the complaint should not take longer than 60 days from the notification to the client that their complaint is admissible.
- 4.3 If, for objective reasons, it is not possible to resolve the complaint within 30 (thirty) days (point 4.1), FUMBI shall inform the complainant in writing of the actions taken and of the extension of the deadline for deciding on the complaint.

5. COMMUNICATION BETWEEN FUMBI AND THE COMPLAINANT WHEN HANDLING THE COMPLAINT.

- 5.1 FUMBI shall duly inform the complainant during the handling of the complaint of all steps taken to handle the complaint. The complainant shall be informed in writing of the receipt of their complaint, its admissibility, the extension of the deadline for deciding on the complaint, the submission of the complaint for decision, and the decision on their complaint.
- 5.2 During the investigation of the complaint, FUMBI is obliged, at the client's request, to provide him with ongoing information on the status of the investigation of his complaint without undue delay.
- 5.3 The client is obliged to provide FUMBI with all the cooperation necessary to clarify and investigate the complaint.

6. DECISION ON THE COMPLAINT.

- 6.1 The decision on the complaint must be in writing. In the decision on the complaint, the client must find a statement on all points raised in the complaint and the reasons leading to the outcome of the investigation.
- 6.2 If the complaint is assessed as justified, the decision shall specify the manner in which the corrective measure will be implemented and the deadline for implementation, which shall not exceed 30 (thirty) days from the date of the decision.
- 6.3 If the complaint is assessed as unjustified or partially unjustified, the decision must also include information that the complainant may reapply to FUMBI and file a repeat complaint, which will be decided directly by the statutory body of FUMBI.
- 6.4 A decision assessing a client's complaint as unjustified or partially unjustified shall include information on the possibility of filing a complaint with the relevant national authorities, e.g.

NBS, Consumer Protection Supervision Department, <https://nbs.sk/dohlad-nad-financnym-trhom/ofs/informacie-pre-spotrebitehov/o-nas/riesenie-staznosti/> in the Slovak Republic, or through an alternative dispute resolution mechanism, etc.

- 6.5 Unless the complainant requests another method of providing information, FUMBI shall provide the client with information about the decision on the next working day after its receipt in the form chosen by the client for the delivery of the complaint (letter, email, form on the FUMBI Platform).

7. OUT-OF-COURT DISPUTE RESOLUTION.

7. The client is entitled to resolve their consumer dispute through an alternative dispute resolution entity (hereinafter referred to as "ADR") that is competent under the laws of the country in which the client has their habitual residence or in which the service was provided. The client may submit a proposal to initiate alternative dispute resolution to any ADR entity that is authorized to resolve the dispute under these legal regulations. A Europe-wide list of alternative dispute resolution (ADR) entities is maintained by the European Commission and is currently available at the following link: https://consumer-redress.ec.europa.eu/dispute-resolution-bodies_en?etrans=sk
- 7.2 Another method of out-of-court dispute resolution is alternative dispute resolution between the client as a consumer and FUMBI, an alternative dispute resolution entity. Pursuant to Section 24(1)(a) of Act No. 391/2015 Coll. on Alternative Dispute Resolution in Consumer Matters and on Amendments to Certain Acts (the "Act"), the Ministry of Economy of the Slovak Republic has published on its website: <https://www.mhsr.sk/obchod/ochrana-spotrebiteľa/alternativne-riesenie-spotrebiteľských-sporov-1/zoznam-subjektov-alternatívneho-riesenia-spotrebiteľských-sporov-1?csrt=3955069034131311195>. The client has the right to submit a proposal for alternative dispute resolution to an alternative dispute resolution entity if FUMBI has rejected the client's complaint or has not responded to it within 30 days of its delivery. The aim is to conclude a written agreement on the resolution of the dispute between the client and FUMBI.
- 7.3 The third method of out-of-court dispute resolution is the assistance of a third impartial person - a mediator. The client and FUMBI will seek solutions with the mediator during informal and non-public proceedings. The prerequisite for mediation is the willingness of both parties to reach an agreement. The mediator is a natural person registered in the list of mediators maintained by the Ministry of Justice of the Slovak Republic. The Ministry of Justice of the Slovak Republic publishes the list of mediators on its website: <https://www.justice.gov.sk/registre/mediatori/>. The performance of mediation, its basic principles, organisation and effects are governed by Act No. 420/2004 Coll. on mediation.

ANNEX

TEMPLATE FOR THE FILING OF COMPLAINTS

FILING OF A COMPLAINT

(to be sent by the client to the crypto-asset service provider)

1.a. Information about the complainant

Last name/Legal entity name:

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First name:

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EUID or if not available national Registration or ID number:

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Legal Entity Identifier (if available):

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Client reference (if available):

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Address (street, number, floor) (for legal entities, registered office):

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Postcode:

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City:

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Country:

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Telephone:

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Email address:

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

Last name/Legal entity name:

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First name:

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Address (street, number, floor) (for legal entities, registered office):

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Postcode:

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City:

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Country:

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Telephone:

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Email address:

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2.a. Information about the legal representative (if applicable) (a power of attorney or other official document as proof of the appointment of the representative to be provided as an attachment to this form)

Last name/Legal entity name:

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First name:

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Registration number and LEI (if available):

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Address (street, number, floor) (For legal entities, registered office)

.....

Postcode:

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City:

.....

Country:

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Telephone:

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Email address:

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

Last name/Legal entity name:

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First name:

.....

Address: street, number, floor (For firms registered office)

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Postcode:

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City:

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Country:

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Telephone:

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Email:

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3. **Information about the complaint**

3.a. **Full reference of the crypto-asset service 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 any 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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In _____ (place) on _____ (date)

SIGNATURE

COMPLAINANT/LEGAL REPRESENTATIVE OF THE COMPLAINANT

Documentation provided (please check the appropriate box):

Power of attorney or other official document as proof of the appointment of the representative

Copy of the contractual documents of the investments to which the complaint relates

Other documents supporting the complaint:

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