

## **Complaints Handling Policy**

### **General Overview**

This Complaints Handling Policy of XBase Virtual Assets Broker & Dealer Services LLC ('XBase Digital') establishes a structured framework for the acceptance, registration, management, and resolution of complaints related to the services and products offered by XBase Digital, as well as agreements executed with clients. The policy ensures compliance with UAE laws and regulations, including the VARA regulatory framework, UAE Personal Data Protection Law, Electronic Transactions and Trust Services Law, and relevant consumer protection provisions.

The primary objective of this policy is to facilitate a fair, effective, and transparent complaints-handling process that enhances client trust and ensures compliance with legal and regulatory requirements. XBase Digital is committed to ensuring that all complaints are handled promptly, fairly, and effectively. Clients are able to submit complaints free of charge, as XBase Digital does not impose any fees or charges for the submission or handling of complaints. The procedures for submitting and handling complaints are clearly communicated through the company's website and customer service channels.

This policy applies to all complaints received from clients or their authorized representatives regarding products, services, contractual obligations, or operational matters. It is mandatory for all employees, management, and relevant stakeholders within XBase Digital to adhere to this policy to ensure a consistent and compliant approach to handling complaints.

### **Commitment to Fair and Transparent Complaints Management**

XBase Digital ensures that its complaints-handling process complies with UAE regulations and international best practices, providing a structured approach to addressing grievances in a professional and efficient manner. Complaints are reviewed by personnel who are independent of the subject matter and have the necessary expertise to ensure impartiality. Employees responsible for complaint resolution are granted access to all relevant information to ensure informed decision-making.

All complaints and the measures taken to resolve them are documented, registered, and securely stored in line with UAE regulatory requirements. The records include the nature of the complaint, the actions taken, and the

resolution, ensuring transparency and accountability in the complaints-handling process. In accordance with regulatory requirements, these records are maintained for a minimum period of eight years. Additionally, complaints that involve personal data are managed in accordance with the UAE Personal Data Protection Law, ensuring that client information is securely processed and stored. Clients have the right to request corrections to their personal data and, in some cases, may stop the processing of their data in line with applicable legal provisions.

The Compliance Officer (CO) is responsible for overseeing the implementation and effectiveness of this policy, monitoring trends, and making necessary improvements to enhance the efficiency of the complaints-handling process. XBase Digital continuously evaluates and updates its complaints-handling process to ensure its effectiveness and compliance with evolving regulatory requirements.

Employees involved in complaints management must adhere to this policy and act professionally, fairly, and transparently. Training and guidance are provided to ensure that all staff members are aware of their responsibilities and the proper procedures for handling complaints. Failure to comply with this policy may result in disciplinary action, reinforcing accountability and maintaining high standards of customer service.

By adopting this policy, XBase Digital reinforces its commitment to consumer protection, regulatory compliance, and fair market practices, ensuring that clients and stakeholders receive a professional and efficient complaints resolution process in accordance with UAE laws and industry standards.

## Definitions

The following words when used in capital letters have the following meaning:

**Applicant** has the meaning of a natural or legal person submitting the Complaint to XBase Digital;

**Business Day** refers to Monday to Friday, with standard working hours from 9:00 AM to 6:00 PM.

**Complaint** has the meaning of the Applicant's notification submitted in writing to XBase Digital stating the rights and/or interests that have been infringed in relation to services and/or products provided by XBase Digital

and requesting cure of such infringement;

**Complaints log** has the meaning of electronic system with which the Complaints (and related information thereto) will be registered.

## **Submission of Complaints**

If an Applicant believes that their rights related to the services provided by XBase Digital have been violated, they are entitled to submit a complaint. XBase Digital considers a complaint to be formally made when it has been received through any of the designated complaint submission channels.

To ensure accessibility and transparency, XBase Digital provides multiple complaint submission channels, allowing clients to report concerns through their preferred method. Complaints can be submitted through the following channels:

- **Email:** [complaints@xbase.digital](mailto:complaints@xbase.digital)
- **Online Form:** A dedicated complaint submission form is available upon request and should be emailed to [complaints@xbase.digital](mailto:complaints@xbase.digital)
- **Postal Mail:** Clients may send their complaints via post to Office Suite #1804, The Exchange Tower, Al Mustaqbal Street, Business Bay, Dubai, U.A.E.

## **Required Information for a Complaint Submission**

To ensure efficient processing and resolution, the Complaint must include the following details:

- **Applicant's Personal Information:**
  - Full name (for individuals) or legal entity name.
  - Registration code (for legal entities only).
  - Residence or registered address.
  - Phone number and email address.
- **Date of the Complaint.**
- **Description of the Issue:** A detailed account of the rights or interests that were violated, along with the circumstances surrounding the incident.
- **Requested Resolution:** The specific remedy or action the Applicant is seeking.

## **Responsibilities of the Applicant**

The Applicant is responsible for ensuring that the personal and contact details provided in the complaint are accurate and up to date. XBase Digital will communicate all information regarding the complaints-handling process using the contact details provided in the complaint. The email address specified in the complaint will serve as the primary method of communication for status updates and resolutions.

Complaints must be submitted directly by the Applicant or their authorized representative. If submitted by a representative, supporting documents must be provided, including:

- A copy of the representative's ID or passport.
- A power of attorney or any other official document proving authorization to act on behalf of the Applicant.

By implementing these structured procedures, XBase Digital ensures that all complaints are recognized, properly monitored, and handled efficiently through designated channels in compliance with UAE regulatory requirements.

## **Complaint Registration and Acknowledgment**

All complaints submitted to XBase Digital are immediately registered in the Complaints Log, ensuring a structured and traceable complaint-handling process. Clients can submit complaints through multiple channels ensuring accessibility and compliance with UAE regulations. Complaints received through any recognized channel are considered formally submitted.

XBase Digital acknowledges all complaints within one (1) week of receipt and informs the complainant about the process and estimated resolution timeline. Complaints must be resolved within four (4) weeks of submission. However, in extraordinary circumstances where additional time is required, XBase Digital provides an update to the complainant, explaining the reasons for the delay within the initial four (4) weeks. In such cases, complaints must be fully resolved no later than eight (8) weeks from the date of submission.

## **Complaint Log and Documentation**

To maintain proper oversight and regulatory compliance, XBase Digital

records all complaints in its Complaints Log, which includes:

- **Complainant details:** Full name (for individuals) or entity name (for legal entities), registered address, phone number, and email.
- **Date and method of submission:** The channel through which the complaint was received.
- **Complaint summary:** A brief description of the issue, the products or services involved, and relevant details.
- **Response timeline and actions taken:** The dates of acknowledgment, updates provided, resolution measures, and final outcome.

Records of all complaints, including details of complaints received from clients, the measures taken in response, and the final resolution, are securely maintained for at least eight (8) years following the final resolution. This ensures compliance with UAE regulatory requirements and facilitates transparency, accountability, and effective complaint management.

## **Handling and Resolution of Complaints**

Once a complaint is registered, it is assigned to a designated employee responsible for drafting a response. The assigned employee must have no direct or indirect involvement in the subject matter of the complaint to ensure impartiality and objectivity in the resolution process. The draft response is then reviewed and approved by the Compliance Officer (CO) or an employee assigned by the CO to oversee the complaint resolution process. Complaints are handled with professionalism, impartiality, and efficiency, ensuring a fair and transparent outcome.

Where complaints require further information, XBase Digital may request the complainant to provide additional details or supporting documents. In such cases, a reasonable deadline of at least seven (7) calendar days is provided for submission. If the complainant meets this deadline, the complaint is considered formally submitted on the date the missing information is provided. If the complainant fails to submit the requested information, the complaint will still be processed to the extent possible, and additional details may be sought during the investigation.

If a complaint is not fully satisfied or is only partially resolved, the response must include:

- The reasons for the decision,
- Alternative dispute resolution options available to the complainant,

and

- The possibility of escalating the matter to the appropriate regulatory or legal authority.

### **Complaints Involving Third-Party Entities**

If a complaint relates to a third-party entity involved in the provision of VA Activities, XBase Digital remains responsible for ensuring its resolution. To facilitate efficient handling of such complaints, the following procedures are in place:

1. **Complaint Registration and Assessment** – Upon receipt, complaints involving third-party entities are logged and assessed to determine the nature of the issue and the level of involvement of the third party.
2. **Engagement with the Third Party** – XBase Digital will promptly coordinate with the relevant third-party service provider to obtain necessary information, clarify responsibilities, and facilitate a resolution.
3. **Communication with the Complainant** – The complainant is kept informed throughout the process, including updates on any interactions with the third party and expected timelines for resolution.
4. **Final Resolution and Compliance Oversight** – Once the issue is resolved, the outcome is communicated to the complainant. If further corrective actions are required, XBase Digital will ensure compliance with all regulatory obligations and internal governance standards.

If a complaint falls outside XBase Digital's direct competence, it will not be investigated. However, non-acceptance of a complaint will only occur when it is evident that neither XBase Digital nor any third-party entity involved in providing VA Activities to the client is responsible for the matter. In such cases, the complainant will be formally notified of the reasons for non-acceptance, and, where possible, will be advised on the appropriate authority or institution that may be responsible for addressing their concerns.

### **Fair Treatment and Compliance with UAE Regulations**

XBase Digital manages complaints with respect for human rights, fairness, objectivity, and justice. Clients are not restricted to submitting complaints through a single method or format, ensuring that all valid complaints are recognized and processed. The firm complies with UAE laws, VARA

regulations, and global best practices in complaint resolution, ensuring transparency and accountability in all interactions.

### **Ongoing Review and Monitoring**

XBase Digital regularly reviews its complaints-handling process to identify and address recurring or systemic issues that may impact its services, products, or operations. The goal is to mitigate legal and operational risks while ensuring compliance with UAE regulatory requirements and improving customer satisfaction.

As part of this process, XBase Digital:

- Collects and analyses complaints to identify common root causes and determine whether similar issues could affect other services or products, even those not directly complained about.
- Assesses whether the identified root causes can be eliminated and, if so, implements corrective actions to prevent recurrence.
- Reports any recurring or systemic complaints to senior management to support informed decision-making and process improvements.

### **Management Oversight and Reporting**

To ensure effective oversight, XBase Digital provides senior management with regular updates on complaints trends, systemic issues, and corrective actions taken. Management decisions related to eliminating complaints-related shortcomings and mitigating risks are documented and retained for at least ten years.

Additionally, XBase Digital maintains comprehensive records of all complaints. These records are submitted to regulatory authorities upon request and stored for a minimum of eight (8) years following the final resolution of a complaint.

### **Policy Review and Updates**

XBase Digital regularly reviews and updates this Complaints Handling Policy to ensure continued alignment with regulatory changes, operational adjustments, and emerging complaint trends. These reviews are conducted at least annually or more frequently if required due to legal updates, regulatory guidance, or internal assessments.

Once approved, policy amendments take immediate effect, and all relevant

employees are promptly informed and provided with the necessary guidance to ensure compliance. Additionally, any updated procedures are published on XBase Digital's website to ensure transparency and accessibility for clients and stakeholders.

By maintaining a structured review and monitoring process, XBase Digital reinforces its commitment to a transparent, fair, and effective complaints resolution framework, ensuring compliance with UAE regulations and best industry practices.