



## **1. SUBMISSION OF COMPLAINTS**

- 1.1. Customers may submit Complaints in English or in Lithuanian language in writing, through the system or other durable media by using the form provided in Annex 1 or 2 to this Procedure via the following methods:
  - 1.1.1. By email: [Support@safe2transact.com](mailto:Support@safe2transact.com) or [Info@safe2transact.com](mailto:Info@safe2transact.com);
  - 1.1.2. Via the platform: Through the client portal support chat or on the website complaints form;
  - 1.1.3. Via mail: NTJ UAB, Konstitucijos ave. 7, LT – 09308, Vilnius, Lithuania.
- 1.2. If the Complaint is submitted by a representative of an Applicant, it must be accompanied by documentation proving the right of representation.
- 1.3. Customers may file Complaints free of charge. The investigation and handling of the Complaint shall also be free of charge for the Applicant.
- 1.4. Complaints will be directed to the customer support team. Customers will be made aware, during the submission process, that complaints should be addressed to the customer support team.
- 1.5. Complaints must be submitted in Lithuanian or in English.
- 1.6. Information to be provided by a complainant as part of a complaint is detailed in Annex 1 and Annex 2 to this Procedure.

## **2. ACKNOWLEDGEMENT OF RECEIPT**

- 2.1. The Company shall acknowledge receipt of a Complaint and confirm whether it is admissible without undue delay, and no later than 10 (ten) working days after receipt.
- 2.2. If a Complaint does not fulfil the conditions of admissibility, the Company shall provide the Applicant with a clear explanation of the reasons for rejecting the Complaint.
- 2.3. Upon acknowledgment, the Applicant will receive a confirmation that includes:
  - 2.3.1. The identity and contact details, including an email address, telephone number and name of the person or department handling the Complaint.
  - 2.3.2. The date of receipt of the complaint and where an electronic complaint is filed, a copy of the complaint filed by the client.
  - 2.3.3. A reference to the timeframe within which a decision on the Complaint will be notified to the Applicant, as specified in Section 5 of this Procedure.

## **3. ADMISSIBILITY OF COMPLAINTS**

- 3.1. The Complaint submitted by the Customer shall meet the following requirements:
  - 3.1.1. The Complaint should preferably be submitted electronically through the system or using the standard form in Annex 1, however, the use of the template is not strictly mandatory.
  - 3.1.2. The Complaint must be submitted in Lithuanian or English language.



- 3.1.3. The Complaint must be filed within 3 (three) months from the date the Customer became aware or ought to have become aware of the violation of their rights or legitimate interests.
- 3.1.4. The Complaint should be clear and accurate; if it is not, the Company may request additional information.
- 3.1.5. The Company must be responsible for the activities specified in the Complaint. If not, the Company shall inform the Applicant and, if possible, direct them to the appropriate authority or entity responsible for handling the Complaint.
- 3.2. The Company shall refuse to investigate the following Complaints:
  - 3.2.1. Complaints that are identical to those already being examined by another competent authority or court or for which a decision has already been made.
  - 3.2.2. Anonymous Complaints.
  - 3.2.3. Complaints submitted more than 3 (three) months after the date the Customer became aware or ought to have become aware of a violation of their rights or legitimate interests.
- 3.3. The Complaint should contain all necessary information and supporting evidence. The Company shall gather and examine all relevant information and evidence regarding the Complaint. If the information provided is insufficient, the Company shall contact the Applicant to request additional documents and information.

#### **4. INVESTIGATION OF COMPLAINTS**

- 4.1. Complaints shall be investigated by the Company in accordance with the principles of reasonableness, fairness, justice, and cost-effectiveness, with the goal of reaching an amicable resolution.
- 4.2. If the Complaint involves actions by the Responsible Employee, their relatives, or employees in higher positions within the Company, or if there are other conflicts of interest, the Responsible Employee must notify the Company's General Manager, who shall appoint another impartial employee to handle the Complaint.
- 4.3. If the Applicant withdraws their Complaint in writing (or other durable media) during the investigation, the investigation shall be terminated, and this shall be noted in the Complaints Register.
- 4.4. The employee investigating the Complaint shall:
  - 4.4.1. Collect and evaluate all documents and data related to the Complaint.
  - 4.4.2. Analyse historical data related to the services provided to the Applicant.
  - 4.4.3. Review any previous Complaints from the Applicant.
  - 4.4.4. Assess other relevant information, including contracts and obligation fulfilment.
  - 4.4.5. Communicate with the Applicant as necessary.
  - 4.4.6. If necessary, seek explanations from employees involved in the Complaint.
  - 4.4.7. Request additional information from the Applicant if needed.
  - 4.4.8. Keep the Applicant informed of any additional actions taken.
- 4.5. The Company must keep the Applicant duly informed about any additional steps taken to handle the Complaint and respond to reasonable requests for information without undue delay.
- 4.6. Complaints shall be investigated electronically or in writing. Communication with the Applicant shall be conducted electronically through the system, or in writing upon complaint's request, and in the language in which the Complaint was filed, provided it is one of the languages referred to in Paragraph 3.1.2.



## **5. SUBMISSION OF RESPONSE**

- 5.1. The original response, along with supporting documents, shall be provided to the Applicant in the same manner the Complaint was submitted.
- 5.2. The decision on a Complaint shall address all points raised and provide the reasons for the outcome. The decision shall be consistent with previous decisions on similar complaints unless a different approach can be justified.
- 5.3. The final decision regarding the Complaint must be approved by the Company's General Manager.
- 5.4. The Responsible Employee must investigate the Complaint and provide a complete, reasoned, and documented response within a reasonable timeframe from receipt of the Complaint.
- 5.5. If it is not possible to respond within the prescribed timeframe, the Company shall send a provisional response, stating the reasons for the delay and the expected date for the final response. The final response must be provided within the maximum timeframe specified in the Procedure.
- 5.6. The Company shall communicate their decision on a Complaint to the Applicant as soon as possible, and in any case within 2 months after the acknowledgement of receipt of the Complaint.
- 5.7. If the decision does not fully satisfy the Applicant's request, it shall include a thorough explanation and inform the Applicant of available remedies, such as filing a complaint with a competent authority or pursuing civil action.
- 5.8. When handling Complaints, the Company shall communicate in clear, plain language that is easy to understand. Communication shall be conducted in the language in which the Complaint was filed, provided it is one of the languages referred to in Paragraph 3.1.2.



## ANNEX NO. 1 – STANDARD FORM FOR THE SUBMISSION OF COMPLAINTS

### SUBMISSION OF A COMPLAINT (to be sent by the client to the crypto-asset service provider)

#### 1.a Personal data of a complainant

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

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

TELEPHONE	EMAIL

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

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



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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

TELEPHONE		EMAIL	
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**3. Information about the Complaint**

**3.a 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 (please clearly specify the subject matter of the complaint)**

**Please provide documentation supporting the facts mentioned**

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**3.c Date(s) of the facts that have generated the complaint**



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

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

In *(place)*

on *(date)*

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*SIGNATURE*

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**COMPLAINANT / LEGAL REPRESENTATIVE**

*Documentation provided (please check the appropriate box):*

*Power of attorney or other relevant document .....*

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

*Other documents supporting the complaint*

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## **ANNEX NO. 2 – AUTOMATED FORM FOR THE SUBMISSION OF COMPLAINTS**

This guide explains the step-by-step process to file a complaint using the automated support system through the client portal when the client is logged into our system.

### **Step 1: Client logs in to his account**

- Visit the Safe2transact website and enter username and password and log in.
- Complete any Two-Factor Authentication (2FA) steps if enabled.

### **Step 2: Access the support portal**

- Navigate to the dashboard after logging in.
- The system already knows all personal data from client when he is logged in.
- Select the Support or Help Center option from the main menu.
- The client will be redirected to the **personalized support portal**.

### **Step 3: Initiate the Complaint submission**

- In the support portal, select the Submit a Complaint or File a Complaint button.

### **Step 4: Complete the Standard form for the submission of complaints (as in Annex No.1)**

### **Step 5: Review and submit the Complaint**

- Review the information entered for accuracy.
- Click the submit Complaint button.

### **Step 6: Confirmation and tracking**

- After submission, a confirmation with a tracking number will be displayed.
- Use this tracking number to monitor the complaint's progress.

### **Step 7: Track the Complaint status**

- In the support portal, access the "My Complaints" section.
- Regularly check for updates on the status and progress of the complaint.

### **Step 8: Receive resolution and provide feedback**

- Once resolved, a notification with the outcome will be sent.
- Provide feedback through a survey if prompted (optional)

### **Additional Information:**

- The automated support system is available 24/7.
- A response can be expected within 48 hours depending on the nature of the complaint.
- If any issues arise during this procedure, contact live chat support or use the emergency contact option available in the support portal.