

# CONFIRMO

## **Confirmo Limited's Complaints Handling Policy**

At Confirmo, we are committed to providing high-quality crypto-asset services and addressing any concerns or complaints in a prompt and professional manner. This Complaints Handling Policy outlines the procedures for filing and handling complaints in accordance with MiCA (Regulation (EU) 2023/1114) and the Irish Consumer Protection Code 2025.

### **1. What is a Complaint?**

**A complaint is any statement of dissatisfaction from a client regarding our crypto-asset services.**

**For clients who are 'Consumers' under Irish law, a complaint is any expression of grievance or dissatisfaction, whether made in writing or orally (such as over the phone). This also includes dissatisfaction with a failure or refusal by us to provide a product or service.**

### **2. Who is a Consumer?**

Under the Irish Consumer Protection Code 2025, a 'Consumer' is defined as:

- A natural person acting for personal use (not for a business, trade, or profession).
- A group of natural persons, such as a club or charity.
- A company or other incorporated body with an annual turnover of €5 million or less.

### **3. How to Submit a Complaint**

#### **All clients**

All clients may submit complaints free of charge through the following channels:

- Email: [complaints@confirmo.net](mailto:complaints@confirmo.net)
- Postal Address: 8-34 Percy Place, Dublin 4, Dublin, D04 P5K3, Ireland
- Languages: Any official language of the European Union

#### **Additional option for Consumers**

In addition to the channels above, clients who qualify as a 'Consumers' may also submit a complaint orally or by contacting us in writing through any usual means of communication.

Where a complaint is made orally, our staff will formally record the details on your behalf and provide you with a written copy of the recorded complaint for your records.

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## 4. Admissibility of Complaint

Complaints are admissible if:

- They relate to the crypto-asset services provided by us
- They are submitted by you as our client or your legal representative (in that case, power of attorney is required)
- They are submitted through official channels as detailed above
- They fulfil the basic requirements for information content (detailed below)

## 5. Information to be included in the Complaint

All relevant identification details of you as the client (and your legal representative, if applicable) must be included:

- Full name or company name
- Date of birth or registration number
- Contact details (address, email, telephone)

A detailed description of the complaint subject matter, including relevant dates, conduct, acts or omissions of us that you dispute, identification of the exact transaction (if applicable), potential loss or damage caused to you, etc., must be included.

The complaint should be accompanied by relevant documentation (if applicable).

In case of submission by a legal representative, a power of attorney must be included.

A complaint template can help guide you through the complaint submission process. You may use the template which is available as an annex of this policy, but it is not required.

## 6. Process for Complaints Handling

Once we receive a complaint:

- Acknowledgement: We will send you an acknowledgement of receipt of the complaint. We will also inform you if your complaint is inadmissible.
- Initial Review: We will review the complaint within five business days to assess whether it is clear and complete. If we need additional information, we will contact you during or after this period.
- Investigation: Once the complaint is clear and complete, we will conduct a thorough investigation. During the investigation, we may contact you for further information.
- Decision: Once the investigation is complete, we will communicate our decision to you via email, unless you explicitly request a paper version.

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## 7. Timeline

- Acknowledgement: Within one business day (email complaint) and 7 business days (postal complaint).
- Decision deadline: A maximum of 60 days from receipt of the complaint.
- Extension of decision deadline: We may extend the period in complex cases or where delays are caused by reasons on your part (for example, when you fail to provide necessary information in a timely manner). In such cases, we will inform you of the extension and the expected resolution time.

## 8. Record Keeping

All complaints are securely recorded in our electronic database. The records include the date of receipt, your details, investigation details, and the decisions made. These records are maintained for regulatory compliance and quality control purposes for 5 years.

## 9. Review of Policy

This Complaints Handling Policy is regularly reviewed by us to ensure compliance with the latest regulations.

## 10. Contact

Should you have any questions regarding this Policy, please contact us at [complaints@confirmo.net](mailto:complaints@confirmo.net).

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## Annex - Complaint Template

### FILING OF A COMPLAINT

(to be sent by the client to Confirmo Limited)

#### **1.a. Information about the complainant**

Last name/Legal entity name: ...

First name: ...

EUID or if not available national Registration or ID number: ...

Legal Entity Identifier (if available): ...

Client reference (if available): ...

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

Postcode: ...

City: ...

Country: ...

Telephone: ...

Email address: ...

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

Last name/Legal entity name: ...

First name: ...

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

Postcode: ...

City: ...

Country: ...

Telephone: ...

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: ...

First name: ...

Registration number and LEI (if available): ...

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

Postcode: ...

City: ...

Country: ...

Telephone: ...

Email address: ...

**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: ...

**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**

...

...

...

Please provide any documentation supporting the facts mentioned.

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

SIGNATURE

COMPLAINANT/LEGAL REPRESENTATIVE OF THE COMPLAINANT

Documentation provided (please check the appropriate box):

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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: [ ]