Ceffu Custody FZE's Complaints Handling Policy

As a business dedicated to ensuring the protection and satisfaction of its customer, Ceffu Custody FZE ("**Ceffu**") has put in place a comprehensive complaints management process and system which is intended to be:

- Transparent, accessible to clients and easy to invoke;
- Fair and impartial between both parties (i.e. Ceffu and its customers);
- Consistent in its approach to the provision of redress, including in relation to compensation where required; and
- Flexible, simple and responsive.

Ceffu treats each complaint with the utmost importance and respect and will investigate and respond to each complaint in a fair and objective manner.

A complaint is defined as any written statement of dissatisfaction from or behalf of a person, about the provision of, or failure to provide a financial service or a redress determination which alleges that the complainant has suffered financial loss, material distress or material inconvenience.

Handling of Complaints

Ceffu recognises the importance of ensuring that all Employees responsible for investigation and decision making in relation to complaints have the appropriate independence and authority to do so. As such all complaints received by Ceffu must be:

- Investigated by an Employee who is not directly impacted or otherwise conflicted in the matter which is the subject of the complaint; and
- Responded by an Employee with the Authority to settle the complaint or with the capacity to escalate matters to another Employee with such Authority.

In the event of complaints on services provisioned by third-party entities relating to VA Activities, Ceffu will facilitate the handling of such complaints between clients and the third-party entities similar to complaints directed at Ceffu. Ceffu will remain responsible for the resolution of such complaints.

Ceffu does not impose any fees or charges for the submission or handling of any complaints.

Lodge a Complaint

Customers of Ceffu Custody FZE may submit complaints through the following channels:

- Email to: complaints dubai@ceffu.com
- Phone +971-4-5232416
- Mail to: Ceffu Custody FZE: Office 229 Level 2, The Offices 1, One Central District, Dubai - UAE

Customers of Ceffu Custody FZE may use the Complaint form for filing complaints.

Investigation and Resolution of Complaints

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- Once a complaint has been received through the various channels, an employee of Ceffu Custody FZE with the required authority will be assigned to investigate the complaint. The employee should send an acknowledgement email to the complainant within one [1] week of receipt of the complaint.
- The employee will diarise the handling of the complaint, noting the receipt date, acknowledgement date, and future response deadline.
- The employee should ensure that all relevant information is gathered before commencing the investigation:
 - o Name:
 - Contact Details;
 - Account email address;
 - Any transaction identification details;
 - Clear, detailed description of the complaint;
 - o All available documentation relating to the complaint; and
 - Information on whether the client has made a complaint to any external party(ies).
- The employee will engage and coordinate with the relevant departments to investigate the complaint and determine suitable resolutions to the complainant.
- Ceffu endeavours to ensure that complaints are addressed in a prompt and efficient
 manner and will provide, within four [4] weeks of receipt of complaints, a final
 response or a response explaining Ceffu's position and how Ceffu propose to deal
 with the complaint, including an indicative timeline for providing a final response.
- All complaints should be resolved no later than eight [8] weeks from when the complaint was made.
- A final response means a response which either:
 - Accepts the complaint and offers redress/compensation where appropriate, including compensation;
 - Offers redress/compensation without accepting the substances of the complaint; or
 - Rejects the complaint and provides reasons for doing so.
- Should the complainant not be satisfied with the final response received after the investigation, the complaint can be forwarded to the VARA eight [8] weeks from the date of receiving the letter from Ceffu, details for which are posted on Ceffu's website.
- Ceffu Custody FZE will retain records of complaints for a period of eight years.