

Complaints Handling Policy And Procedure

Oxen Finance Platform

Escrowfy GmbH

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1. Introduction and Commitment

1.1. Escrowfy GmbH, operating under the Oxen Finance brand (“Oxen”, “we”, “our”), is committed to providing a high standard of service to all clients. We recognise, however, that there may be occasions when clients are dissatisfied with the service they have received. This Complaints Handling Policy and Procedure (“Policy”) sets out how we handle complaints in a fair, transparent, consistent, and timely manner.

1.2. We treat every complaint seriously and view complaints as an opportunity to identify shortcomings, improve our services, and restore client confidence. All complaints are handled free of charge.

1.3. This Policy is designed to comply with the requirements of:

The VQF Self-Regulatory Organisation rules and guidance on complaints handling;

The EU Payment Services Directive (PSD2) and its implementing measures, where applicable;

The UK Financial Conduct Authority (FCA) Dispute Resolution: Complaints Sourcebook (DISP), where applicable;

The ADGM Financial Services Regulatory Authority (FSRA) requirements on complaints handling; Swiss consumer protection principles and the Swiss Code of Obligations;

Any other applicable regulatory requirements in the jurisdictions in which we operate.

2. What Constitutes a Complaint?

2.1. For the purposes of this Policy, a “complaint” is any expression of dissatisfaction, whether oral or written, made by or on behalf of a client (including a prospective or former client), relating to the provision of, or failure to provide, our services, which:

Alleges that the complainant has suffered, or may suffer, financial loss, material inconvenience, or material distress; or Relates to the quality, timeliness, or fairness of the service provided.

2.2. The following are examples of matters that may give rise to a complaint:

Errors or delays in the processing of payments or transactions;

Incorrect fees, charges, or exchange rates applied;

Account freezing, suspension, or closure;

Failure to respond to a service request within a reasonable timeframe;

Data protection or privacy concerns;

Dissatisfaction with the outcome of an identity verification or KYC/KYB process;

Staff conduct or professionalism;

Technical issues, platform errors, or security incidents.

2.3. A routine enquiry, request for information, or first-time request for service does not constitute a complaint unless the client has expressly indicated dissatisfaction.

Framework	Scope
Swiss AMLA (GwG) and AMLO (GwV)	Core AML legislation: client identification, beneficial ownership, due diligence, record keeping, suspicious activity reporting to MROS
VQF Regulations (VQF-RL)	SRO-specific rules on risk classification, due diligence, monitoring, and compliance organisation
FINMA Anti-Money Laundering Ordinance (AMLO-FINMA)	Supervisory guidance applicable to financial intermediaries
EU Anti-Money Laundering Directives (AMLD 4/5/6)	Applicable where we serve EU-based clients or process EU-related transactions
UK Money Laundering Regulations 2017 (MLR 2017)	Applicable where we serve UK-based clients or operate through UK-authorised partners
ADGM AML and Sanctions Rules and Guidance	Applicable in connection with our ADGM licensing strategy
FATF Recommendations (40 Recommendations)	International standards for AML/CTF/CPF; benchmark for our policies and procedures
FATF Travel Rule (Recommendation 16)	Requirements for originator and beneficiary information in wire transfers and virtual asset transfers

3. How to Submit a Complaint

You may submit a complaint through any of the following channels:

Channel	Details
Email (preferred)	complaints@oxen.finance – Please include “Formal Complaint” in the subject line
In-platform messaging	Via the secure messaging system within your Oxen Finance account (Crisp live chat)

To help us investigate and resolve your complaint as quickly as possible, please include the following information:

- Your full name and the email address or account number associated with your Oxen Finance account;
- A clear and detailed description of the issue, including relevant dates, transaction references, and amounts;
- Any supporting documentation (e.g., screenshots, transaction confirmations, correspondence);
- The outcome you are seeking (e.g., refund, correction, explanation, apology).

4. Complaints Handling Procedure

All complaints are handled in accordance with the following procedure:

4.1 Stage 1 – Acknowledgement

Element	Details
Timeframe	Within 2 business days of receipt
Action	We will send you a written acknowledgement confirming: (a) receipt of your complaint; (b) a unique complaint reference number; (c) the name or department of the person handling your complaint; (d) the expected timeline for resolution.

4.2 Stage 2 – Investigation

4.2.1. Your complaint will be assigned to a member of our compliance or client services team who has the appropriate authority, competence, and independence to investigate and resolve the matter. The assigned handler will not have been directly involved in the subject matter of the complaint, unless impractical due to the nature of the issue.

4.2.2. During the investigation, we may contact you to request additional information or clarification. We will keep you informed of the progress of our investigation at reasonable intervals.

4.2.3. The investigation will include, as appropriate: review of transaction records and system logs; review of relevant correspondence and communications; interviews with relevant staff; assessment against our internal policies, contractual terms, and applicable regulatory requirements.

4.3 Stage 3 – Resolution

Element	Details
Timeframe	Within 2 business days of receipt
Action	We will send you a written acknowledgement confirming: (a) receipt of your complaint; (b) a unique complaint reference number; (c) the name or department of the person handling your complaint; (d) the expected timeline for resolution.

4.4 Stage 4 – Internal Escalation

4.4.1. If you are not satisfied with the outcome of Stage 3, you may request an internal escalation by writing to escalation@oxen.finance or by indicating in your response to our final resolution that you wish to escalate. Escalation requests must be made within 30 calendar days of receipt of the Stage 3 final response.

4.4.2. Escalated complaints are reviewed by a senior member of management who was not involved in the original investigation. The escalation review will be completed within 15 business days and a written final escalation response will be issued.

4.4.3. The final escalation response constitutes Escrowfy GmbH's final internal position on the matter.

5. Sanctions and PEP Screening

If you remain dissatisfied after exhausting our internal complaints procedure, you may have the right to refer your complaint to an external authority. The relevant authority depends on your location and the nature of the service:

Jurisdiction	Authority	Contact Details
Switzerland	Swiss Banking Ombudsman (Ombudsstelle)	www.bankingombudsman.ch Barenplatz 2, CH-3011 Bern
European Union	EU Online Dispute Resolution (ODR) Platform; or national ADR body in your Member State	https://ec.europa.eu/consumers/odr
United Kingdom	Financial Ombudsman Service (FOS) – if Escrowfy or its UK partner is FCA-authorized for the relevant service	www.financial-ombudsman.org.uk 0800 023 4567 (UK)+44 20 7964 0500 (Int'l)
UAE / ADGM	ADGM Courts / ADGM Financial Services Regulatory Authority	www.adgm.com Al Maryah Island, Abu Dhabi
Canada	Applicable provincial consumer protection body; FINTRAC (for AML-related matters)	www.fintrac-canafe.gc.ca

Note: Your right to refer a complaint to an external body may be subject to time limits, eligibility criteria, and jurisdictional requirements. We will provide specific escalation information in our final response letter, tailored to your jurisdiction.

6. Complaints Involving Third Parties

6.1. Where your complaint relates to a service provided by a third-party partner (e.g., a banking partner, card issuer, or identity verification provider), we will:

Accept and log the complaint through our own complaints process;

Liaise with the relevant third-party partner on your behalf;

Keep you informed of progress and provide you with the third-party's response;

Where appropriate, direct you to the third party's own complaints procedure if the matter falls outside our control.

6.2. Where a complaint involves both our services and those of a third party, we will coordinate the response to ensure that you receive a single, coherent final response addressing all aspects of the complaint.

7. Remedies and Redress

Where we determine that your complaint is upheld or partially upheld, we may offer one or more of the following remedies, depending on the nature and circumstances of the complaint:

A full or partial refund of fees, charges, or incorrect amounts;

Correction of the error or transaction;

Compensation for direct financial loss suffered as a result of our error or failure;

A formal apology; An explanation of what went wrong and the steps we have taken to prevent recurrence;

Changes to our internal processes, policies, or staff training.

We do not offer compensation for indirect, consequential, or speculative losses, except where required by applicable law.

8. Your Obligations as a Client

By using the Oxen Finance platform, you agree to:

- Provide accurate, complete, and truthful information during onboarding and throughout the business relationship;
- Promptly notify us of any changes to your personal information, residential address, corporate structure, beneficial ownership, or business activity;
- Respond to requests for additional information or documentation in a timely manner;
- Not use the platform for money laundering, terrorism financing, sanctions evasion, tax evasion, fraud, or any other illegal purpose;

- Not structure transactions or activity in a way designed to avoid reporting thresholds or circumvent our monitoring controls;
- Not provide false, misleading, or forged documentation;
- Cooperate with our compliance team in connection with any review, investigation, or request for information.

Failure to comply with these obligations may result in: delay or refusal of onboarding; suspension of services; freezing of funds; termination of the business relationship; and/or reporting to the relevant authorities.

9. Record Keeping and Reporting

9.1. We maintain a centralised complaints register recording all complaints received, including the date of receipt, nature of the complaint, complaint reference number, assigned handler, investigation findings, outcome, remedial action, and date of resolution.

9.2. Complaint records are retained for a minimum of 10 years from the date of resolution, in accordance with Swiss AMLA retention requirements and applicable regulatory obligations.

9.3. Complaints data is reported to senior management on a quarterly basis, including trends, root cause analysis, and systemic issues. Where a pattern of complaints indicates a systemic failing, we will take prompt corrective action.

9.4. Where required by applicable regulation, we report complaints data to the relevant regulatory authority (e.g., FCA, VQF, ADGM FSRA).

10. Vulnerable Clients

10.1. We recognise that some complainants may be in vulnerable circumstances (e.g., due to health, age, financial difficulty, or life events). Where we identify or are informed that a complainant is vulnerable, we will:

- Handle the complaint with additional sensitivity and care;
- Offer additional time to respond to requests for information;
- Ensure communications are clear, accessible, and free from unnecessary complexity;
- Offer alternative communication methods if needed (e.g., telephone instead of written correspondence).

11. Confidentiality

11.1. All complaints are handled with strict confidentiality. Information relating to your complaint will only be disclosed to individuals directly involved in the investigation, resolution, or oversight of the complaint, and to external parties (e.g., regulators, ombudsmen) where required by law or where you have consented to the

referral.

11.2. Submitting a complaint will not adversely affect your relationship with Oxen Finance or the provision of services to you.

12. Updates to This Policy

12.1. We review this Policy at least annually and update it as necessary to reflect changes in regulatory requirements, industry best practices, or our internal processes.

12.2. The most current version of this Policy is available at oxen.finance/complaints.

13. Contact

To submit a complaint or enquire about the status of an existing complaint:

Complaints Email	complaints@oxen.finance
Escalation Email	escalation@oxen.finance
General Support	support@oxen.finance
Postal Address	Escrowfy GmbH – ComplaintsBahnhofstrasse 7, 6300 Zug, Switzerland