



Appendix 1 – Complaints Handling Procedure

The Complaints Handling Procedure (the “Procedure”) of ALT21 Europe Limited (the “Company”) shall provide the relevant information to eligible natural or legal persons wishing to lodge a complaint (the “Complainant”) to the Company.

The Procedure outlines the process to be followed in order to ensure that complaints are handled promptly, equally, fairly and efficiently.

Provision of Information

The Company shall:

- On request or when acknowledging receipt of complaints, provide written information regarding their complaints handling process;
- Publish details of their complaints handling process in an easily accessible manner. In this regard, the Company has published its complaints handling procedure on its website;
- Provide clear, accurate and up-to-date information about the complaints handling process including:
 - Details of how to make a complaint; and
 - The process that will be followed when handling a complaint.
- Keep the complainant informed about further handling of the complaint.

Filing a Complaint

Complaints may be made free of charge and ideally in writing, addressed to the Complaints Management Function of the Company, using one of the following methods:

Email	kate.pace@alt21.com
Post	171 TRIQ L- IFRAN VALLETTA Malta VLT 1455

Complaints shall be addressed to the Company's Complaints Handling Function.

In case the complaint has been made verbally, the Company shall make a summary of the complaint and request the Complainant to confirm in writing the said summary and send a signed copy of the complaint to the Company.

The Complainant should provide the Company with as much detail as possible to enable the Company to resolve the concerns fairly, effectively and promptly. The Complainant should provide at least the following information:

- Name and address of the Complainant;
- Contact details of the Complainant (e.g. telephone number and/or email address);
- If the complaint is being handled by an external representative, include external representative name and contact details;
- A description of the complaint and how it affected the Complainant;
- Supporting documentation for the complaint; and
- When the incident(s) occurred.

Procedure for Responding to Complaints

The Company shall:

- Acknowledge receipt of complaint in writing upon receipt of complaint, no later than three (3) business days from receipt of Complaint;



- Should a complaint be made orally, the Company shall make a summary of the complaint and request the complainant to confirm the summary in writing and send a signed copy of the complaint to the Company;
- Seek to gather and investigate all relevant evidence and information regarding the complaint;
- Communicate in plain language, which is clearly understood.

For complaints related to the Company's MiFID licensable activities, the following procedure shall thereafter be followed in terms of timeliness of response:

- Provide a response without unnecessary delay, or at least, by no later than 15 business days from when the complaint was received. Where the investigation of a complaint is not completed within 15 business days from receipt of complaint, the Company shall:
 - Inform the complainant about the causes of the delay; and
 - Provide an indication as to when the investigation is likely to be completed.

For complaints related to the Company's electronic money licensable activities, the following procedure shall thereafter be followed in terms of timeliness of response:

- Provide a response without unnecessary delay, or at least, by no later than 15 business days from when the complaint was received;
- In exceptional situations, if the answer cannot be given within 15 business days for reasons beyond the control of the payment service provider, it shall be required to send a holding reply, clearly indicating the reasons for a delay in answering to the complaint and specifying the deadline by which the payment service user will receive the final reply. In any event, the deadline for receiving the final reply shall not exceed 35 business days.

When providing a final decision in writing in terms of the complaint which does not fully satisfy the complainant's request, the complainant may refer the complaint to the Officer of the Arbiter for Financial Services established under the Arbiter for Financial Services Act (Cap. 555).

The Arbiter for Financial Services can be contacted as follows:

Address	Office of the Arbiter for Financial Services N/S in Regional Road Msida MSD 1920 Malta
Telephone	Freephone (local calls): 80072366 Telephone: (+356) 21249245

Further details may be found at: <http://financialarbiter.org.mt>

The Company also confirms that complaints may be lodged free of charge.