

Complaints Handling Policy and Procedure 2025

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Background

In accordance with the VARA Market Conduct Rulebook, ZEPLY is required to have adequate policies and procedures in place for the investigation, recording and resolution of Complaints made against it.

ZEPLY's policy will ensure that:

- Clients are treated fairly at all times;
- No fees or charges are imposed on the submission of complaints;
- Any complaints raised by Clients are dealt with courteously and on a timely basis;
- Complaints raised are managed in a manner that is compliant with the VARA complaints handling provisions; and,
- Clients are fully informed of their rights to alternative remedy if they are not fully satisfied with the ZEPLY's response to their complaint.

The Compliance Officer and governing board will approve ZEPLY's complaints policy and procedures before they are implemented. Subsequent significant changes will be proposed by the Compliance Officer and ratified by the Board of Directors.

ZEPLY's complaints handling policy and procedures will be available to Clients on request as well as being supplied automatically in response to the receipt of a complaint.

Complaints Officer

The "Complaints Officer" (currently the assumed responsibility of the Risk Officer) of ZEPLY will be responsible for implementing the Complaints Handling policy and procedures. He will receive and deal with Customer Complaints concerning the services rendered by ZEPLY. The Key responsibility areas of the Complaints Officer would be to interact with ZEPLY's Clients and handle grievances and ensure resolution in an unbiased manner.

The Complaints Officer is authorised to both investigate the Client Complaints and offer redress. Should there be any necessity, the Complaints Officer will escalate a Customer Complaint to the governing board, either to report the gravity of the complaint or for the requisite approval while redressing the complaint

Method of Complaint

Complaints may be made by the following method:

- In writing
- In person
- By Email

Identity of Complainant

Where a complaint is made in person or via email, the Complaints Officer shall record the complaint on the Internal Complaints Record form (see Appendix 1). The form must be completed and shared with the Complaints Officer without delay.

Where a complaint is being made on behalf of a third party (an individual may through incapacity not be able to make direct contact with ZEPLY), then the identity of the complainant and the third party must be identified prior to the complaint being treated as valid.

Note: Interviews must be recorded as appropriate. In serious cases it would be advisable to have two staff members present and for formal minutes to be taken.

Website publication

Any complaints to be raised with regards to a ZEPLY product or service, interaction with an employee or representative or any other matter, must be submitted via email to Complaints@deusxpay.com

Each submitted complaint must contain the following information:

- Client Legal Entity Name (Complainant)
- Complainant's Residential Address in the United Arab Emirates
- Complainant's Permanent Residential address if different from the above
- Complainant's contact number
- Complainant's mobile number if different from the above
- Complainant's email address
- Complainant's representative name
- Complainant's representative mobile number
- Complainant's representative email address
- Date the complaint issue occurred
- Cause of the complaint
- Type of Transaction/Service linked to the complaint
- Details of the complaint
- Preferred resolution
- Amount and Currency of transaction

Referral and Acknowledgement of Complaint

All complaints must be immediately referred to the Complaints Officer. Any Client making a complaint must promptly be furnished with a copy of these internal Complaints Procedures. The Complaints Officer will maintain a register of all complaints referred to him, which will document action taken and status of the complaint.

The Complaints Officer will within five working days of receipt of a complaint send a written acknowledgement of the complaint, giving his full name and job title for identification purposes to the customer and enclose a copy of the Company's Complaints Procedure so that customers are advised of the system and response times as well as their right to make a complaint to VARA.

Complaint Resolution Time Frame

Complaints must be dealt with in a timely manner immediately from the date of receipt of the complaint. Hence, in addition to the acknowledgement of receipt (within five working days), the following programme must be adhered to.

- Within four weeks either
 - Provide a written final response to the complainant or
 - In writing, advise the complainant of any delay (including the reason) in dealing with the complaint and give a final date (within eight weeks from the date of complaint) when a final response will be given.
- Not later than eight weeks, provide a final response or
 - Advise in writing that ZEPLY is not in a position to give a definitive response, giving reasons for the delay and indicate a date by when a final response will be forthcoming and,
 - Inform the complainant that they may refer the matter to VARA if they are unhappy with the delay.

When ZEPLY sends a complainant the final response, ZEPLY will inform the complainant that they may refer the complaint to VARA if dissatisfied with the final response and that they must do so within six months

Third-Party Entities

Where the provision of ZePLY services relating to Virtual Asset Activities that involve a third-party entity, ZePLY shall facilitate the handling of such complaints between its clients and the third-party entity. Throughout the complaint process, ZePLY will remain responsible for the resolution of such complaints and adopt the 'Compliant Resolution Time Frame' as reflected within this policy.

Redress

This may consist of, but not be restricted to, financial compensation or an apology for poor or loss of service with an indication of corrective measures that have been taken to prevent re-occurrence. Such corrective action may include a change in procedures, additional staff training or disciplinary action. ZEPLY will however not communicate the name/s and/or position of the staff concerned.

Appeals

Every effort will be made to redress the complaint and satisfy the Client. ZEPLY does however understand that it might not always be possible to satisfy a Client and hence will appraise the Client they have the option to refer the complaint to VARA should they feel that the complaint has not been suitably redressed.

Record Keeping

The Complaints Officer is responsible for keeping documentary records of all complaints for a minimum period of eight (8) years from the date of receipt of a complaint. These records shall include, but not be limited to, the following:

- The complaints register
 - Date of receipt
 - Resolution date
 - Date of governing board report
 - Date of VARA report
 - Recipient
 - Details
 - Root cause
 - Resolution
 - Internal Remediation
 - Steps taken to resolution
 - Adherence to complaints policy timelines
- The internal complaints record form
- All complaints received from clients
- All correspondence between the complainant and ZEPLY
- All measures taken to address, or in response to the complaints
- Any meeting or interview record notes
- Whether any alleged problem, if substantiated during investigation, was rectified and how
- The resolution of all complaints.

Training

ZEPLY shall also ensure that all employees are trained on its Complaints Handling policy and procedures and are kept necessarily informed of significant changes to the same.

Co-operation with VARA

- The Complaints Officer is the focal point of contact with VARA and is responsible for liaison between it and ZEPLY. Full co-operation is to be given to VARA with respect to the complaint resolution process by the officer.

Appendix 1- Internal Complaints Record Form

Full Name and Title of complaint recipient:

Full Name of complainant (Individual and Legal entity name):

Residential Address in the United Arab Emirates:

Permanent Residential address if different from the above:

Complainant's contact number:

Complainant's mobile number if different from the above:

Complainant's email address:

Date the complaint issue occurred (cause of the complaint):

Complaint location :

Type of Transaction/Service linked to the complaint:

Amount and Currency of transaction:

Details of the complaint:

Signature:

Date:

Appendix 2- Client Complaints Template

When raising a complaint with regards to a ZEPLY product or service, interaction with an employee or representative, or any other matter, the below Client Complaints template must be completed and submitted via email to the ZEPLY Complaints Officer at Complaints@deusxpay.com. The template captures the details of the ZEPLY Client, the individual submitting the complaint, the complaint itself and the desired resolution or outcome.

Client Complaints Template

Clients Legal Entity Name (Complainant):

Complainant's Residential Address in the United Arab Emirates:

Complainant's Permanent Residential address if different from the above:

Complainant's contact number:

Complainant's mobile number if different from the above:

Complainant's email address:

Date the complaint issue occurred (cause of the complaint):

Type of Transaction/Service linked to the complaint:

Details of the complaint:

Amount and Currency of transaction:

Preferred resolution:
