

Stake RWA FZE Customer Complaints Handling Policy

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1. Definitions

Term	Definition
Applicable Laws and Regulations	Refers to all relevant laws and regulations in the UAE including the laws and regulations of VARA.
Business Days	Refers to Business days refer to days of the week when most businesses and government offices are open and operational in the UAE, excluding weekends and public holiday.
Complaint	Refers to an expression of dissatisfaction by the Customer that was not resolved at the Customer level and subsequently escalated to the Company, with a product, service, policy procedure or actions of the Company that is presented to an Employee of the Company in writing or verbally.
Customer	Refers to any individual or legal entity that engages in primary or secondary trading of real estate tokens on the Company's proprietary digital infrastructure.
Complaints Handling Officer	Refers to the officer, acting through the Customer Support Department, who is responsible for receiving, managing, and resolving inquiries, issues, and Complaints in an efficient, impartial, and professional manner. This function ensures that all Complaints are addressed promptly, in full compliance with applicable regulatory requirements, while maintaining fairness, transparency, and a high standard of Customer satisfaction.
Customer Support Department	Refers to the Customer Support Department responsible for managing Customer inquiries, issues, and Complaints efficiently and professionally. It ensures timely resolution, compliance with regulatory requirements, and high levels of Customers satisfaction.
Employee	Every individual working for the Company under its supervision and direction.
Complainant	Refers to any individual or entity who submits a Complaint to the Company, regardless of whether they are a customer, service provider, employee, or unrelated third party, and irrespective of the reporting channel used.

2. Introduction

2.1 Purpose of this Policy

This Customer Complaints Handling Policy (the “Policy”) sets Stake RWA FZE (the “Company”) expectations and requirements for the effective management of Complaints. The Policy further explains procedures and controls to ensure that the Company manages Complaints in a timely and effective manner.

The mismanagement of Complaints can result in the regulatory, reputational and financial risk. The Policy enhances the Company’s compliance with the VARA regulations in relation to effective Complaints management and setting clear responsibilities and expectations in relation to the VARA rulebooks.

An effective Complaints management programme ensures that all complaints are:

- Objectively managed
- Treated fairly and in a timely manner
- Consistently, ensuring a fair outcome for all Complainants

This Policy sets out the standards and expectations that govern the Company’s relationship with its Customers.

2.2 Regulatory Framework

This Policy has been developed in alignment with the applicable legal and regulatory framework of the UAE, including but not limited to the regulations and rulebooks issued by VARA.

2.3 Scope of Application

The Company must have in place a fair, accessible, and transparent process for addressing Complaints, ensuring their timely resolution without any charges. This Policy outlines the standards, procedures, and expectations for effective Complaint handling and resolution. This policy sets out the process for handling Complaints raised in connection with the Company services. It covers Complaints submitted by Customers, individuals and legal entities that currently use, have previously used, or may in the future use the Company’s products or services within the UAE.

2.4 Ownership and Governance

This Policy is maintained and updated by the Complaints Handling Officer. The Policy will be under the Compliance Officer oversight and approval. All amendments to the Policy must be recorded in the version control and ultimately approved by the Company’s Board. The Company’s Board is ultimately responsible for an effective Complaints Management Programme and the implementation of the Policy.

2.5 Policy Review

This Policy shall be maintained in an up-to-date manner and shall be reviewed at least annually, or earlier if deemed necessary to reflect changes in VARA's regulatory requirements, the Company's business operations, or emerging risks and Complaints. The scope and application of this Policy shall remain proportionate to the nature, scale, and complexity of the Company's operations.

3. Responsibility

The Company shall ensure that all Complaints are handled and investigated by Employees who are not directly involved in the subject matter of the Complaint, thereby ensuring impartiality and objectivity.

For this purpose, the Company will designate an independent function (Customer Support Department) to oversee the handling and resolution of Complaints. This function shall operate separately from the business units whose activities are the subject of the Complaint and will be empowered to conduct fair, consistent, and timely reviews of all Complaints, including recommending appropriate remedial action where applicable.

This independent function shall be responsible for:

- Ensuring Complaints are handled and investigated by Employees not directly involved in the matter under Complaint.
- Acknowledging and resolving Complaints within the regulatory timelines.
- Monitoring and maintaining multiple channels for the submission of Complaints and ensuring accessibility for Customers.
- Escalating Complaints to senior management and, where relevant, coordinating with third-party entities while retaining overall responsibility for resolution.
- Recording all Complaints received, actions taken, and their resolution, in compliance with record-keeping requirements.
- Reporting any potential breaches of applicable laws and regulations identified during the Complaint process to the Compliance function.
- Analyzing Complaint data to identify root causes, recurring or systemic issues, and recommending corrective actions to prevent recurrence.

4. Reporting Requirements

The Company shall maintain complete and accurate records of all Complaints received, actions taken, and the resolution of each Complaint, in accordance with regulatory requirements.

The independent Complaints handling function shall prepare regular reports for senior management, which shall include:

- Statistics on the number, type, and status of Complaints received;
- An analysis of whether Complaints were acknowledged and resolved within the prescribed regulatory timelines;
- Identification of any recurring or systemic issues arising from Complaints, including the root causes of such issues; and
- Recommended corrective measures to prevent recurrence and improve the effectiveness of the Complaints-handling process.

Quarterly reports shall be escalated to Board, who shall oversee the overall effectiveness of the Complaints handling systems and procedures.

Additionally, the Company shall conduct periodic reviews of Complaint data to identify trends, recurring issues, or potential breaches of applicable laws and regulations, and shall escalate such findings to the Compliance function for further action.

5. Ethical Standards and Customer Protection

The Company is committed to upholding high ethical standards in its interactions with Customers and to ensuring that all Complaints are handled promptly, fairly, and objectively, in accordance with applicable regulatory requirements. This is achieved through the implementation of an internal code of conduct, regular employee training, and effective monitoring of Complaints.

The Company shall not impose any fees or charges for submitting or handling Complaints. In addition, the Company shall clearly disclose these complaint-handling procedures on its website in an easily understandable manner.

5.1 Regular Training

- Training Programs: The Company shall ensure that all relevant Employees are aware of and act in accordance with the internal Complaints handling procedures. Front line Employees must be trained on how to appropriately receive, document, and escalate Complaints.

- Updates: Employees must be kept informed of any changes to applicable laws, regulations, and internal policies relating to Complaints handling.
- Evaluation: The Company shall monitor the performance and competency of Employees involved in the Complaints handling process to ensure consistent service standards. These standards shall be linked to key performance indicators (KPIs) for assessment and continuous improvement.

5.2 Monitoring Complaints

- Process Establishment: The Company shall maintain a structured and accessible process for receiving, documenting, and resolving Complaints fairly, consistently, and within prescribed timelines.
- Analysis: Complaints shall be periodically analyzed to identify common or recurring root causes and to assess whether such issues may affect other products, services, or processes.
- Feedback Loop: Insights from Complaint monitoring shall be used to strengthen training programs, enhance internal policies, and improve the overall Customer experience.
- Ongoing Monitoring: The Company shall maintain ongoing monitoring of Complaint trends and issues, with periodic reports to senior management to ensure accountability and continuous improvement.

6. Communication Channel for Complaints

The Company shall provide Customers with multiple accessible channels for the submission of Complaints. While the Company will make available a standardized complaint form to facilitate ease of submission, Customers shall not be limited to submitting Complaints through a single channel or format.

Complaints may be submitted through the following channels:

- **Dedicated Email:** A designated email address for complaints submission will be published on the Company's website at contact@getstake.com
- **Telephone:** +971 042949473

- **In-App Chat:** Real-time messaging through the Company's application.
- **Website Form:** An online complaint submission form available on the Company's website.

The Company shall actively monitor all communication channels to ensure that Complaints submitted through any medium are promptly identified, logged, and escalated for resolution. Employees responsible for monitoring these channels shall be trained to recognize and classify Complaints accurately. The Company will periodically review the effectiveness of each communication channel to ensure accessibility, responsiveness, and compliance with regulatory timelines.

7. Resolution Timelines

The Company promptly acknowledge all Complaints within one (1) week of the complaint being made by any user, Customer, individuals, or legal entities.

The Company shall resolve all complaints within four (4) weeks of the Complaint being made. In exceptional circumstances, if a resolution cannot be achieved within this timeframe, the Company must provide the Customer with an update on the Complaint's status, including an explanation of the extraordinary circumstances causing the delay, within four (4) weeks of the Complaint being made. The resolution of the complaint must be finalized no later than eight (8) weeks from the initial Complaint.

The Company shall offer an easily accessible template form for users, Customers, individuals and legal entities to file Complaints. Clear instructions and accessible means shall be provided, allowing users to submit complaints through various channels or forms without limitation.

8. Third-Party Entity Involvement

When the Company receives Complaints that involve third-party entities, procedures shall be in place to facilitate effective Complaint handling between Customers and these entities. The Company shall retain overall responsibility for resolving such Complaints and ensuring fair outcomes. In cases where a Complaint is referred to an external party, such as a regulatory authority or service provider, the Company may be required to disclose personal data of Customers, service providers, or third parties in accordance with applicable data protection laws. Customers, service providers, and third parties have the right to object to such disclosure on reasonable grounds, provided the objection is documented in writing.

9. Information and Support

The Company shall ensure that complainant receive clear and understandable information concerning their right to have their problems or Complaints addressed efficiently, effectively, and with respect.

10. Customer Complaints Handling Procedure

All Complaints shall be addressed fairly, efficiently, and without undue delay. The Company will actively identify, investigate, and resolve any recurring or systemic issues that may arise. Complaints will be handled by the Customer Support Department, staffed with competent and impartial personnel who are not directly involved in the matter under review. This department will be vested with the appropriate authority to ensure effective resolution of all Complaints.

Additionally, all Employees will be made fully aware of the Company's Complaint Handling Procedures and will receive ongoing training to ensure consistent and compliant application across the Company. There are no fees or charges for complaints handling.

10.1 Receipt and acknowledgement

A Complainant (irrespective of the reporting channel) will file a complaint with the Company. Upon receipt of the Complaint, the Company must acknowledge it in writing within 1 week of complaint being made. The complaint must be assigned to a Complaints Handling Officer. The Complaints Handling Officer must ensure that the complaint is recorded on the Complaints Log. The Complaints log must at a minimum record the following information:

- Name of the Complainant
- Complaint unique ID
- Customer ID (if a Customer)
- The particulars of the Complaint (including transactional reference numbers where applicable)
- Date of the incident

10.2 Fact finding and investigation

a) Step 1: Initiation of Investigation

Following acknowledgment of a Complaint, the Company shall initiate the investigation process. The Complaints Handling Officer must ensure that fact-finding activities are carried

out thoroughly and objectively, with a fair and unbiased perspective, allowing the Complaint to be reviewed at face value to achieve fair outcomes. As such, the Company will not recognise queries as Complaints which pertain to the nature of services, business model, CDD or KYC process, or other similar standard requirements.

b) Step 2: Categorization of Complaint

Complaints shall be categorized by the Complaints Handling Officer into one of the following types:

- System and service-related issues: Relating to the Company's platforms, operations, or delivery of services.
- Employee-related issues: Relating to the conduct, actions, or behavior of the Company's Employees.
- Financial issues: Involving errors, charges, or potential financial loss;
- Regulatory issues: Regarding compliance with applicable laws, regulations, or supervisory requirements.

c) Step 3: Determination of Complaint Status

The Complaints Handling Officer shall assess whether the matter qualifies as a Complaint and must document this assessment. The Complaint shall then be classified as either:

- Non-material Complaint: may be closed by the Investigating Analyst without escalation, provided full documentation is maintained;
- Material Complaint: must be escalated to Senior Management, including the Compliance Officer (CO), for collective review to ensure fair and appropriate outcomes.

d) Step 4: Criteria for Material Complaints

A Complaint shall be deemed material if it:

- Could lead to significant financial losses for any party involved;
- Involves gross misconduct or negligence;
- Poses regulatory or reputational risk to the Company.

The Complaints Handling Officer must exercise sound judgment when assessing materiality and record the reasons for classification. In cases where the Customer has indicated an intention to file an official Complaint with public authorities (e.g., VARA, Police, or other authorities), the matter must also be escalated to Senior Management.

e) Step 5: Ongoing Communication with the Complainant

If the investigation is expected to extend beyond 4 weeks, the Company must notify the Complainant at or before the 4 weeks. This update must include:

- The current status of the Complaint;
- The reasons for the delay;
- The interim steps taken by the Company to progress the resolution.

f) Step 6: Resolution

The Company is required to resolve Complaints within four (4) weeks from the date the Complaint was received. The resolution must be communicated to the Complainant together with the outcome of the investigation. Where redress is offered, the Company must notify the Complainant of the terms of such redress. The Complainant shall be provided with a period of seven (7) days to accept the resolution. If no response is received within this timeframe, the Company shall consider the Complaint resolved. In instances where the Complainant does not accept the proposed resolution, the Company must notify the Complainant of alternative steps available. In such cases, the Complaints Handling Officer must escalate the matter internally and present the full investigation to Senior Management for further assessment, at which point the Complaint will revert to the fact-finding and investigation phase for renewed consideration. In case of any delay, the resolution timeline must be clearly communicated to the Complainant, including reasons for the delay and an updated expected timeframe.

Employees handling the Complaint from the concerned department are responsible for conducting the investigation to ensure that the Complaint is comprehensively addressed. They must prepare an investigation report with findings and a recommended course of action. All Complaints shall be handled equitably, objectively, and without bias. If the resolution does not result in any financial loss to the Company and relates to a service failure or shortcoming under the Company's internal procedures, the relevant department, in coordination with the Customer Support Department, may take corrective action and provide a formal response to the Customer. Where required, the Legal Department may also be consulted for guidance.

However, if resolving the Complaint may result in financial implications for the Company or involves a sensitive issue, the matter must be escalated to the Customer Support Department and reviewed in consultation with the finance department, Compliance Officer, and Senior Management. The escalation must be supported by the investigation report and a proposed course of action. All required internal approvals must be obtained before any final response is

issued. Once the approvals are secured, the relevant department, in coordination with the Customer Support Department, will issue a formal response to the Customer.

The final response must include:

- A clear determination of the outcome of the Complaint, including any proposed remedy or corrective measure;
- Detailed reasoning for the Company's position, except in cases where disclosure is restricted due to financial crime compliance obligations or legal prohibitions;
- Information on the escalation process for unresolved Complaints, outlining the escalation levels. A Complaint will only be deemed unresolved if it progresses to the next escalation level and remains outstanding.

Employees handling the Complaint are also responsible for ensuring timely submission of all relevant documentation and information to the Customer Support Department to facilitate the preparation of required internal reports and regulatory submissions, where applicable.

g) Step 6: Recording and Retention of Findings

Upon conclusion, the outcome of the investigation shall be fully documented and retained for a minimum period of eight (8) years from the date of receipt of the Complaint. The record shall include, at a minimum:

- Date of receiving the complaint;
- Date of resolving and closing the complaint;
- The Complainant's name and, if applicable, the Customer's identification number;
- The Company's formal response to the Complaint and all supporting documentation;
- Details of the actions the Company has taken or will take as part of the resolution.

All documents relating to a Complaint, receipt, fact finding and investigation and resolution must be maintained for a minimum period of 8 years from the date of the receipt of the complaint. Retention efforts must ensure that all data and documents is accessible and extractable within a timely manner and all parties related to the Complaint are properly identified.

11. Systems and Controls

The Company must maintain a structured system through which all Complaints are logged, assigned a unique reference ID, tracked, and resolved. This system shall allow the monitoring of the status, progress, and aging of Complaints in real time. The Company shall also ensure ongoing

monitoring and trend analysis of Complaints on a monthly basis, in order to identify recurring issues, root causes, and opportunities for service improvement.

12. Complaint Handling Responsibility

The Company shall ensure that Complaints are handled by individuals who are impartial and not directly involved in the subject matter of the Complaint. Employees responsible for handling Complaints must have sufficient authority to resolve them, or direct access to individuals with the necessary authority. Where appropriate, and subject to proper due diligence, the Company may outsource certain elements of the Complaints procedure to suitably qualified third parties; however, the Company retains ultimate responsibility for ensuring that all Complaints are managed and resolved in accordance with this Policy.

13. Complaint Management Reporting

The Customer Support Department is responsible for maintaining accurate records of all Complaints and providing monthly reports to Senior Management, including the Compliance Officer. The monthly reports must, at a minimum, include the number of Complaints received, upheld, and rejected, together with trend analysis, categorization of material Complaints, and details of Complaint aging. The Compliance Officer is responsible for making any required regulatory notifications. In addition, the Customer Support Department shall ensure that quarterly reports are presented to the Board, who shall oversee the overall effectiveness of the Complaints handling systems and procedures.

14. Receipt of Complaints against the Company's Employees

Complainant may submit Complaints concerning Company Employees directly to the Customer Support Department. Under no circumstances may the receiving Employee disclose the details of the Complaint to any other party related to the individual in question.

Upon receipt of a Complaint regarding a Company Employee, the Customer Support Department shall assign the matter to the appropriate personnel for review and resolution. Such Complaints will be managed with the highest degree of sensitivity, objectivity, impartiality, and confidentiality, and strictly in accordance with the Company's Human Resources policies.

15. Customer Rights

In addition to all rights outlined in the Consumer Protection Policy, the Company ensures that Customers are fully informed of their rights and responsibilities when seeking to resolve any issues or complaints. Clear and accessible information will be provided to guide Customers through the complaint resolution process, including their entitlements, obligations, and the steps required to escalate unresolved matters.

Additionally, all Employees will be trained to ensure that Customers are treated fairly, consistently, and without bias at all times. The Complaint mechanism, along with related Employee training, must reflect and uphold the Company's commitment to fairness, transparency, and equitable treatment.

The Company shall provide Customers with access to a fair and efficient Complaint resolution mechanism, free of charge, for addressing unresolved Complaints.

16. Complaint and Inquiry Data Analysis and Management

The Company shall leverage data from Complaints and inquiries to enhance its business conduct, improve product offerings, and strengthen its control framework. To achieve this, the Company shall implement the following provisions in accordance with regulatory expectations:

- The Company shall establish robust standards for the collection, classification, storage, and analysis of Complaint and inquiry data. This data shall be treated as a critical resource for identifying deficiencies in sales practices, business conduct, product design, and system functionality.
- The Company shall utilize Complaint and inquiry data to identify key risks and trends, conduct root cause analyses of recurring issues, and perform thematic reviews. Insights gained from these analyses will inform the design of new controls and improvements in service quality and operational efficiency.
- The Company shall document all actions taken based on the analysis of Complaint and inquiry data, ensuring this information is available for review by Regulatory Authority.
- The Company shall monitor Complaint data and maintain comprehensive records, including but not limited to:
 - Complaints received, resolved, and pending (on a quarterly basis);

- Substantiated complaints;
 - Complaints acknowledged or resolved outside target time frames;
 - Overdue Complaints;
 - Complaints referred to the Company's Customer Support Department;
 - Complaints before the courts;
 - Complaints where Complainant remain dissatisfied with the investigation results;
 - The nature and value of redress provided; and
 - Suggestions from Customers arising from Complaints.
- The Company shall analyze Customer inquiries to identify common issues. This analysis shall guide improvements in product and service communication.

17. Cooperation with VARA

The Company must cooperate fully with VARA, providing all requested information promptly and transparently. This cooperation ensures regulatory compliance and fosters trust and confidence in the services provided by the Company.

The Company shall notify VARA of any recurring or systemic complaints as required under applicable regulations. The Company's complaint handling framework shall also ensure coordination with internal departments, including Customer Support, Legal, Compliance and Human Resources, depending on the nature and sensitivity of the Complaint.

18. Policy Implementation & Management

This Policy is complemented by the Consumer Protection Policy and a suite of other policies (e.g., Data Protection and Privacy Policy, Code of Conduct, etc.) incorporating at its essence an accountable, transparent, and responsible business conduct.