Complaints Handling and Escalation Policy

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1. Purpose and Scope

1.1 Purpose

- The purpose of this Complaints Handling Policy (the "**Policy**") is to establish a structured, transparent, fair, and efficient framework for receiving, assessing, investigating, responding to, recording, and escalating customer complaints received in connection with the **ULinkOne** Programme operated by [Dena Investment Limited] (the "**Company**").

As a technology and programme service provider participating in the **ULinkOne** Programme under a Global Managed Account ("**GMA**") arrangement with FV Bank International Inc. ("**FV Bank**"), the Company is committed to maintaining appropriate customer protection standards, operational governance, and effective complaint management procedures.

- Specifically, this Policy aims to:

Ensure Fair and Timely Complaint Handling
Provide customers with accessible and transparent procedures to submit complaints, ensure that complaints are appropriately reviewed, investigated, and addressed within applicable service standards, and provide customers with clear communication regarding the status and outcome of their complaints.

Establish Clear Complaint Governance and Escalation Responsibilities
Define internal complaint handling responsibilities and establish appropriate escalation procedures, including the distinction between matters handled directly by the Company and matters requiring coordination with or escalation to FV Bank.

Support Risk Management and Compliance
Support compliance with applicable legal, regulatory, and customer protection requirements by ensuring that complaints involving potential operational, compliance,

fraud, or regulatory risks are appropriately identified, recorded, and escalated where necessary.

Promote Continuous Improvement

Utilize complaint trends, customer feedback, and root-cause analysis to improve the Company's products, technology infrastructure, API integrations, customer service processes, credit extension activities, and overall customer experience.

1.2 Scope

This Policy applies to all directors, officers, employees, contractors, and other personnel involved in the operation, support, and management of the ULinkOne Programme.

This Policy applies to complaints submitted by customers, end-users, or their authorised representatives in relation to products, services, or interactions provided by or through the Company under the GMA arrangement.

For the avoidance of doubt, the Company acts as a technology and programme service provider and does not provide banking services or make banking, compliance, or regulatory decisions on behalf of FV Bank.

1.2.1 Covered Complaints

This Policy covers complaints relating to products, services, and customer interactions provided by or supported through the Company in connection with the ULinkOne Programme, including but not limited to:

(a) Platform, Technology and API Services

Complaints relating to:

- access to the Company's digital platform or application;
- platform functionality and user experience;

- technical errors, system availability, or API-related issues;
- delays or issues relating to customer onboarding support processes.
- Where such matters involve decisions or processes controlled by FV Bank, the Company shall coordinate with FV Bank in accordance with this Policy.

(b) Card-Related Services and Transaction Support

Complaints relating to:

- card activation, delivery, or customer support;
- transaction-related enquiries received through the Company;
- service-related fee explanations or disclosures;
- initial reports of suspected unauthorized transactions, fraud, or chargeback-related matters.
- Where complaints relate to card issuance, transaction authorization, settlement, chargeback decisions, or other banking functions controlled by FV Bank or relevant service providers, the Company shall facilitate appropriate escalation and coordination.

(c) Company-Provided Credit Extension Services

Complaints relating to credit services provided directly by the Company, including:

- credit assessment and credit limit decisions;
- repayment processing;
- credit-related fees;
- collection communications;
- customer understanding of applicable credit terms and conditions.

(d) Customer Service and Operational Support

Complaints relating to:

- customer service quality;
- response times;
- communications provided by the Company;

- conduct of Company personnel;
- privacy and data handling practices relating to Company-managed activities.

1.2.2 Matters Subject to Separate Handling or Escalation

Certain matters may be received by the Company but are subject to separate handling procedures or escalation because they involve decisions, services, or regulatory responsibilities outside the Company's direct control.

(a) FV Bank-Controlled Banking Matters

Matters primarily determined or controlled by FV Bank, including:

- account opening or rejection decisions;
- account restrictions, suspension, freezing, or closure;
- banking compliance decisions;
- regulatory reporting decisions;
- other banking activities for which FV Bank retains sole decision-making authority.
- The Company may assist customers in submitting or communicating such complaints and shall coordinate with FV Bank where appropriate. Final decisions relating to such matters remain with FV Bank.

(b) Internal Employment and Whistleblowing Matters

Complaints relating to:

- employment disputes;
- workplace grievances;
- internal personnel matters;
- employee whistleblowing disclosures,
- shall be handled under the Company's applicable internal policies and procedures.

(c) Commercial or Business-to-Business Disputes

Disputes between the Company and third-party vendors, service providers, or institutional partners arising from contractual or commercial relationships shall be handled pursuant to the relevant contractual arrangements and dispute resolution mechanisms.

2. Definitions

2.1 Complaint

"Complaint" means any expression of dissatisfaction submitted by or on behalf of a customer or end-user regarding products, services, or interactions provided by or through the Company, where the complainant expects the matter to be reviewed, addressed, or responded to.

2.2 Complainant

"Complainant" means a customer, end-user, or authorised representative who submits a Complaint or otherwise expresses dissatisfaction regarding products, services, or interactions covered by this Policy.

2.3 Material Complaint

"Material Complaint" means a Complaint that involves, or may reasonably involve, significant customer impact, material financial loss, suspected fraud, suspected data privacy breaches, significant service disruption, potential material non-compliance with applicable legal or regulatory requirements, or material operational, legal, or reputational risks.

2.4 Banking-related Complaint

"Banking-related Complaint" means a Complaint relating to banking services, account activities, card-related functions, payment processing, or other regulated banking matters that are provided by, controlled by, or subject to the authority of FV Bank.

2.5 Credit-related Complaint

"Credit-related Complaint" means a Complaint relating to credit services provided directly by the Company, including credit assessment, credit limits, repayment obligations, credit-related fees, or customer communications relating to the Company's credit extension activities.

2.6 Service Request / General Enquiry

"Service Request / General Enquiry" means a routine request for information, assistance, account support, or clarification that does not express dissatisfaction, allege service failure, or seek corrective action or remedy.

2.7 GMA Arrangement

"GMA Arrangement" means the Global Managed Account arrangement established between the Company and FV Bank under which FV Bank provides regulated banking services and the Company provides programme-related technology, customer-facing services, and operational support activities in connection with the ULinkOne Programme.

2.8 Senior Management

"Senior Management" means the senior-level personnel of the Company responsible for overseeing business operations, governance, risk management, and significant decision-making relating to the ULinkOne Programme and complaint handling activities.

2.9 Root Cause Analysis (RCA)

"Root Cause Analysis (RCA)" means a structured review process undertaken to identify the underlying causes, contributing factors, and potential corrective actions relating to material, recurring, or significant complaints and operational issues.

3. Complaint Handling Principles

The Company applies the following principles to ensure that customer complaints received in connection with the ULinkOne Programme are handled in a fair, transparent, timely, and professional manner. These principles apply throughout the complaint handling lifecycle, including complaint receipt, assessment, investigation, response, escalation, and continuous improvement.

3.1 Fairness and Impartiality

The Company handles complaints objectively and consistently, based on relevant facts, available information, applicable terms and conditions, and without bias toward customers, internal teams, or other relevant parties.

The Company ensures that complaints are reviewed appropriately and that any corrective actions or remedies are proportionate and within the Company's authority.

Where a complaint involves matters controlled by FV Bank or other third parties, the Company shall coordinate with the relevant party in accordance with applicable escalation procedures.

3.2 Accessibility

The Company provides customers with accessible and convenient channels to submit complaints without unnecessary barriers or costs.

The Company communicates relevant complaint procedures, including available channels, submission requirements, handling timelines, and escalation procedures through appropriate customer-facing channels.

3.3 Transparency

The Company maintains clear and timely communication with complainants throughout the complaint handling process.

The Company provides appropriate acknowledgement, updates where necessary, and responses explaining the outcome of the complaint review and available further escalation options.

3.4 Timeliness

The Company seeks to handle complaints in a timely manner in accordance with the applicable timelines set out in this Policy.

Material Complaints, including those involving significant customer impact, suspected fraud, serious service disruption, potential regulatory concerns, or significant operational risks, shall be subject to appropriate prioritization and escalation.

Where delays arise due to factors outside the Company's reasonable control, including dependencies on FV Bank or other relevant parties, the Company shall provide appropriate updates to complainants.

3.5 Confidentiality and Data Protection

The Company protects the confidentiality and security of information obtained during the complaint handling process.

Complaint-related information shall be accessed, processed, stored, and shared only for legitimate complaint handling, escalation, compliance, or operational improvement purposes and in accordance with applicable data protection requirements and the Company's Data Privacy Policy.

4. Complaint Handling Governance and Responsibilities

The Company maintains a structured complaint handling framework with clearly defined responsibilities, internal escalation procedures, and coordination arrangements with FV Bank.

The responsibilities set out in this section apply to the management, assessment, investigation, escalation, and monitoring of complaints received in connection with the ULinkOne Programme.

4.1 Customer Support / Operations Team

The Customer Support / Operations Team acts as the primary operational contact point for customers and is responsible for the initial handling of complaints received through designated channels.

4.2 Compliance and Risk Function

The Compliance and Risk Function provides internal oversight and serves as the primary review and escalation function for complaints involving elevated risks, compliance considerations, or matters beyond frontline handling capability.

4.3 Management Oversight

Management provides oversight over the effectiveness of the Company's complaint handling framework and ensures appropriate governance, resources, and decision-making arrangements.

4.4 FV Bank Coordination

The Company maintains coordination procedures with FV Bank for complaints involving matters within FV Bank's responsibility under the GMA arrangement.

Where a complaint relates to regulated banking activities or decisions controlled by FV Bank, the Company shall facilitate appropriate communication and escalation with FV Bank.

5. Complaint Intake and Registration

The Company maintains appropriate procedures to ensure that customer complaints received in connection with the ULinkOne Programme are properly captured, recorded, and managed.

Customers may submit complaints through designated communication channels provided by the Company, including electronic channels and other customer support channels made available from time to time. Complaints received shall be recorded in the Company's Complaint Register with sufficient information to support appropriate assessment, handling, tracking, and escalation where required.

The Company shall collect relevant information relating to the complainant, the nature of the complaint, affected products or services, and supporting materials where applicable. Complaint-related information shall be handled in accordance with applicable data protection requirements and the Company's Data Privacy Policy.

6. Complaint Assessment, Investigation and Resolution

The Company shall assess, investigate, and address customer complaints in a fair, objective, and timely manner.

Upon registration, complaints shall be assessed and classified based on their nature, potential impact, and complexity to determine the appropriate handling approach and responsible function.

Where appropriate, the Company shall conduct a reasonable review of the complaint based on available operational records, transaction information, customer communications, and supporting documentation. Where a complaint involves banking-related matters or services controlled by FV Bank, the Company shall coordinate with FV Bank in accordance with applicable escalation procedures.

Following the review, the Company shall determine an appropriate outcome or corrective action within its authority, including service corrections, commercial remedies, or goodwill arrangements where justified. The complainant shall be provided with a clear and reasoned response explaining the outcome and any available further escalation options.

7. Coordination with FV Bank

The Company shall maintain appropriate escalation and coordination procedures with FV Bank for complaints involving banking services, regulated activities, or matters under FV Bank's control.

Complaints requiring coordination with FV Bank may include matters relating to:

- account processing or banking infrastructure issues;
- payment processing or settlement issues;
- card-related disputes, chargebacks, or card programme matters;
- account restrictions or other actions resulting from FV Bank's compliance processes; and
- other matters where FV Bank retains decision-making authority.

Where an escalation trigger is identified, the Company shall notify FV Bank through the designated coordination channel within the applicable timeframe and provide relevant information and supporting documentation necessary for FV Bank's review.

For complaints relating to matters within FV Bank's responsibility, final determinations shall remain with FV Bank. The Company shall communicate customer updates and outcomes based on information and decisions provided by FV Bank and shall continue to support customer communication throughout the escalation process where appropriate.

8. Material Complaints and Regulatory Risk Management

A complaint may be classified as a Material Complaint where it involves:

- significant customer financial impact;
- severe or systemic service disruption;
- suspected fraud;
- suspected data privacy breaches; or
- potential material non-compliance with applicable legal or regulatory requirements.

Material Complaints shall be promptly escalated internally to Senior Management and the Compliance and Risk Function for appropriate review, oversight, and determination of further actions.

Where a Material Complaint involves matters within FV Bank's responsibility or may impact regulated banking services under the GMA arrangement, the Company shall coordinate with FV Bank in accordance with applicable escalation procedures.

Risk mitigation measures, regulatory notifications, customer communications, and other follow-up actions shall be managed by the relevant responsible party in accordance with applicable legal requirements, regulatory obligations, and contractual arrangements.

9. Record Keeping and Management Reporting

The Company shall maintain appropriate record-keeping and reporting mechanisms to ensure traceability, accountability, and effective oversight of complaint handling activities.

The Company shall maintain a Complaint Register and retain relevant records relating to complaint intake, assessment, investigation, correspondence, escalation to FV Bank, and complaint outcomes. Complaint-related records shall be securely maintained in accordance with applicable data protection requirements and retained for the period required under applicable laws, regulatory requirements, and contractual obligations with FV Bank.

The Compliance and Risk Function shall prepare periodic complaint management reports summarizing relevant complaint information, including complaint volumes, categories, handling timelines, material complaints, root cause trends, and matters escalated to FV Bank. Such reports shall be provided to Senior Management for oversight purposes and shared with FV Bank where required under the GMA arrangement or applicable contractual obligations.

10. Root Cause Analysis and Continuous Improvement

The Company is committed to using complaint information and trends to identify recurring operational issues and drive continuous improvements to its products, services, and customer experience.

The Compliance and Risk Function, in coordination with relevant operational and technical teams, shall conduct Root Cause Analysis (RCA) for material, recurring, or significant complaints. RCA activities may consider underlying issues relating to product design, API integrations, operational processes, risk controls, customer communications, and other relevant areas.

Findings from RCA shall be incorporated into the Company's improvement processes, including appropriate operational, product, technology, or control enhancements. Where identified root causes involve matters within FV Bank's responsibility, including banking infrastructure, card programme processes, or FV Bank-controlled compliance activities, the Company shall coordinate with FV Bank regarding relevant findings and any actions required within each party's respective responsibilities.

11. Training and Policy Review

The Company shall ensure that relevant personnel involved in complaint handling possess appropriate knowledge and skills to perform their responsibilities under this Policy and that this Policy remains effective, compliant, and up to date.

The Company shall provide appropriate training to personnel involved in complaint management, including customer support, operations, risk, and compliance functions. Training shall cover relevant complaint handling procedures, complaint classification, investigation standards, customer communication requirements, data protection obligations, and escalation procedures relating to FV Bank and the ULinkOne Programme. Training records shall be maintained for internal governance and compliance purposes.

This Policy shall be reviewed at least annually, or following significant regulatory developments, material operational changes, or material changes to the GMA arrangement with FV Bank. Material amendments to this Policy shall be approved by Senior Management and provided to FV Bank where required under the GMA arrangement or applicable contractual obligations.

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Appendix A Complaint Register Template

The Central Complaint Register maintained by the Company shall capture, at a minimum, the following mandatory data fields for every complaint received under the ULinkOne Programme.

Field ID	Field Name	Description & Standard Format
A-01	Complaint Reference ID	Unique system-generated tracking number (e.g., CMP-YYYYMMDD-XXXX).
A-02	Date & Time Received	Exact timestamp when the complaint entered any official intake channel.
A-03	Complainant Details	Customer Full Name, Registered Email, Contact Phone, and GMA Account ID.
A-04	Intake Channel	Source channel (e.g., In-App Ticket, Email, Call, Official Letter).
A-05	Product / Service Category	Affected area (e.g., Account Access/API, Card Issuing, Proprietary Credit, Customer Support).
A-06	Complaint Classification	Initial severity tagging (Standard, Material, Banking-Related, Credit-Related).
A-07	Summary of Complaint	Concise description of facts, transaction details (Amount/Currency/Date), and core grievance.
A-08	Remedy Requested	Customer's requested outcome (e.g., Refund, Card Unblock, Credit Limit Adjustment, Waiver).
A-09	Assigned Handler	Name / Department of the primary case owner (e.g., Operations / Compliance).
A-10	FV Bank Escalation Status	Escalated to FV Bank? (Yes / No / Pending); Date of Escalation; FV Bank Case Reference.
A-11	Investigation Summary & RCA	Brief findings of fact, root cause tag (e.g., Tech Bug, Partner Outage, Human Error).
A-12	Final Resolution & Action	Action taken, financial compensation/goodwill amount (if any), and reasoning.
A-13	Date of Final Response	Date the final response letter/notification was delivered to the customer.
A-14	Case Status & SLA Tracker	Current status (Open, Pending FV Bank, Resolved, Closed) and SLA compliance (Met / Breach).

Appendix B Complaint Classification Guide

To ensure consistent handling, accurate SLA tracking, and clear escalation paths, incoming complaints shall be classified across two core dimensions: **Product/Service Category** and **Severity Level**.

1. Classification by Product / Service Category

Frontline staff shall tag each complaint based on the primary underlying cause and affected service module:

Category Code	Product / Service Area	Coverage & Examples	Operational Ownership & Escalation Path
CAT-01	**Account & API Services**	Onboarding friction, digital KYC delays, login authentication errors, API uptime issues, and web/app display glitches.	**Operations / Engineering** *(Internal resolution)*
CAT-02	**Card & Payment Services** *(Banking-Related)*	Card issuance failures, POS/online decline errors, transaction clearing delays, virtual card ledger discrepancies, and chargebacks.	**Operations → Compliance** *(Mandatory escalation to **FV Bank**)*
CAT-03	**Proprietary Credit Services** *(Credit-Related)*	Disputes over Company-extended credit limits, interest calculation, repayment processing, or debt collection conduct.	**Compliance & Risk Function** *(Internal resolution under credit policy)*
CAT-04	**Customer Support & Privacy**	Staff miscommunication, delay in response times, poor service attitude, and general data handling inquiries.	**Customer Support Lead** *(Internal operational review)*

2. Classification by Severity Level & SLA Matrix

Complaints shall be categorized into three severity tiers to determine investigation priority, management involvement, and FV Bank notification requirements:

Severity Level	Criteria & Impact	Escalation Required	Target Resolution SLA
Level 3: Material / Bank-Escalated	Allegations of fraud, severe data privacy breaches, card scheme chargeback disputes, core banking ledger discrepancies, or matters threatening regulatory compliance.	Immediate escalation to Senior Management and mandatory notification to FV Bank.	Acknowledged within 24 hours; final resolution strictly aligned with joint FV Bank SLAs.
Level 2: High	Substantial financial disputes, recurring API/payment failures affecting multiple users, or contested proprietary credit extension terms.	Internal escalation to Compliance and Risk Function.	Within 7 to 10 business days.
Level 1: Standard	Minor operational issues, UI/UX glitches, general service miscommunications, or minor transactional delays (non-financial).	None (Frontline handling).	Within 3 to 5 business days.

Appendix C Key Contacts

1. Complaint Handling Contacts

Department: Service Dept.

Official Contact: service@denatrust.com

2. FV Bank Coordination Contacts

Department:

Official Contact: