

Complaint Handling Policy Standard Chartered Luxembourg

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1.1 Introduction

Standard Chartered Luxembourg S.A. (“**SCL**” or the “**Company**”) has established a Complaint Handling Policy (the “**Policy**”) and maintain effective and transparent procedures for the prompt, fair and consistent handling of complaints received from the clients.

1.2 General Principles

SCL has established and maintained a transparent and documented framework to handle the complaints received by clients.

Complaints can be submitted through the template to be found on the website, following the instructions in the section 1.4 of this Policy.

1.3 Definition of Complaint

In this Policy, the term complaint means a statement of dissatisfaction addressed to SCL by one of its clients relating to the provision of one or more crypto-asset services. The below do not constitute a complaint:

- Request information or documentation
- Observations and suggestions or report

1.4 Channels for submitting a complaint

Clients can submit a complaint, using one of the official channels:

Email: Compliance.CFCRLuxembourg@sc.com

OR

Post:

Att: Chief Compliance Officer
53, Boulevard Royal
L-2449 Luxembourg
Grand Duchy of Luxembourg

Complaints must be submitted free of charge, through the official template, in order to facilitate the ordinary collection of information and/or documentation.

A complaint must contain at least the following:

- Identity and full contact details of the complainant;
- Reasons for the complaint in relation to the service provides by the Company or in relation to the transaction; and
- Where necessary and possible, any additional documentation to support the complaint.

The language used by the Company will be mainly in English. In addition, SCL will be into position to accept any complaints filed in any other official language of EU Member State in which the Company provides the services. All the complaints are reviewed by the Chief Compliance Officer (“**CCO**”), which is responsible for receiving, qualifying, investigating and responding to complaints.

As a general principle, complaints are treated in accordance with the principle of impartiality, timeliness and transparency.

1.5 Acknowledgment of the complaint

The Company shall acknowledge receipt of a complaint within ten (**10**) business days from the date on which the complaint is received. The acknowledgment shall include, at a minimum, the following information:

- The name, identity and contact details, including email address and phone number of the person or department to which the complainant can address any query related to the complaint
- The date of receipt of the complaint;
- An indicative timeframe for the review of the complaint; and
- Where the complaint has been submitted electronically, a copy of the complaint as received.

Where a complaint does not meet the applicable admissibility requirements set out in section 1.3 of this Policy, the Company shall notify the complainant accordingly and provide a clear explanation of the reasons why the complaint has been deemed inadmissible.

1.6 Investigation

All complaints will be investigated by the CCO which he/she assesses whether the complaint is clear and complete.

The CCO shall assess the information submitted with the complaint and determine whether any additional information is required. Where the complaint is found to be unclear or incomplete, the CCO may request the complainant to provide such further information as is reasonably necessary to enable the Company to properly investigate and address the matter.

As a general principle, the Company shall not request information from the complainant that is already available to the Company or that it is otherwise legally required to possess.

1.7 Final Decision

The Company shall communicate its decision on the complaint in writing within two (**2**) months from the date of receipt of the complaint. The written response shall include, at a minimum:

- A summary of the complaint
- The assessment carried out by SCL
- Any corrective measures adopted by the Company
- Any alternative dispute resolutions
- The contact details of the compliance function for any further communications

Where the complainant considers the response unsatisfactory, the complainant may escalate the matter to the Authorised Management Body. The relevant contact details and escalation process shall be provided in the final decision.

As a general principle, decisions issued by the Company shall be consistent with the previous decisions taken by SCL in relation to comparable complaints, unless the Company can provide appropriate justification for adopting a different approach.

Where in exceptional circumstances, the decision cannot be provided within the timeframe of two (**2**) months, the Company shall inform the complainant without undue delay about the reasons for that delay and specify the date of the decision.

1.8 Remedies in case of an unsatisfactory answer

In case the complainant is not satisfied of the outcome of the complaint, he/she can refer to the CSSF procedure (please refer to the CSSF section at the following link: [CSSF - Réclamation](#))

1.9 Data Retention

SCL maintains a complaint handling register which is reviewed and analysed on continuous basis and maintained by the compliance function. All the data, information and documentation is retained for a period of five (5) years from the date of the final decision (See section 1.7).

1.10 Policy Owner and Review

The Policy is approved and reviewed by the Board of Directors and Authorized Management body of the Company on annual basis or in the event of any change to the laws and regulations applicable to SCL.

2. GLOSSARY

Term	Definition
Authorized Management Body	The persons referred to in Articles 8(1)(i) and 24-4(i) of the LPS. These persons are generally referred to as "executive manager(s)", "authorised manager(s)" or "authorised management";
Board of Directors	As per definition under CSSF Circular 26/906, it refers to the body who from the point of view of corporate law, control the management exercised by the management body.
Client	A person (whether a natural person, entity or legal arrangement) with whom Standard Chartered Luxembourg S.A. has entered into a business relationship.
Company	Standard Chartered Luxembourg S.A.
Complainant	A client (or their legally appointed representative) who submits a statement of dissatisfaction regarding the provision of one or more crypto-asset services provided by Standard Chartered Luxembourg S.A.
Complaint	It means a statement of dissatisfaction addressed to a crypto-asset service provider by one of its clients relating to the provision of one or more crypto-asset services
Policy	Complaint Handling Policy
SCL	Standard Chartered Luxembourg S.A.