

CUSTOMER COMPLAINTS POLICY

OF

IQANA TECHNOLOGIES, S.L.U.

June 2026

Version and Modification History

Version	Type of review	Description of the modification	Author	Date
V 1.0	Initial approval	N/A	Board of Directors	30/06/2026

1. Introduction

This Customer Complaints Policy (the "**Policy**") establishes the organisation, principles and procedure of Iqana Technologies, S.L.U.'s ("**Iqana**") customer-service and customer-protection function and governs the prompt, fair and consistent handling of Complaints filed by Clients in connection to the provision of crypto-asset services, in accordance with Article 71 of Regulation (EU) 2023/1114 (MiCA) and Delegated Regulation (EU) 2025/294.

2. Purpose and scope of application

The Policy is intended to establish an effective and transparent procedure that allows for the prompt, fair and consistent handling of Complaints received from Clients, as well as the description of such procedure.

The Policy applies to all Complaints submitted by Clients (as defined in section 4) in relation to one or more crypto-asset services provided by Iqana, and to Iqana's staff involved in processing them.

3. Regulatory framework

This Policy is based on:

- a) Regulation (EU) 2023/1114 on markets in crypto-assets (MiCA), in particular Article 71 thereof;
- b) Delegated Regulation (EU) 2025/294, which specifies the requirements, templates and procedures for the handling of Complaints by crypto-asset service providers; and
- c) Regulation (EU) 2016/679 (GDPR), regarding the processing of personal data.

4. Definitions

- "**Complaint**": a declaration of dissatisfaction addressed to Iqana by one of its Clients in relation to the provision of one or more crypto-asset services.
- "**Client**" means any natural or legal person to whom Iqana provides crypto-asset services.
- "**Complainant**" means the Client or, where applicable, its duly accredited legal representative, who submits a Complaint.
- "**Template**" means the form for the submission of Complaints set out in Annex I, in accordance with the Annex to Delegated Regulation (EU) 2025/294.

5. Approval, monitoring and modification

5.1 Approval

This Policy has been established and approved by Iqana's Board of Directors, which is responsible for overseeing its proper implementation.

5.2 Regular monitoring and review

The Board of Directors regularly assesses and reviews the effectiveness of the Policy and the procedure and adopts the measures necessary to remedy any deficiencies identified.

5.3 Modification and version control

Any changes to the Policy will be approved by the Board of Directors and will be reflected in the version history.

6. Free-of-charge procedure

The filing and handling of Complaints are free of charge for the Complainant.

7. Customer service and resources manager

7.1 Designation and requirements

Iqana appoints a customer service manager, appointed by the Board of Directors, who must have good reputation and the appropriate knowledge and experience for the exercise of his or her duties. Their contact details are set out in Annex II.

7.2 Causes of incompatibility and ineligibility

The role of customer service manager may not be held by any person who:

- a) is disqualified or suspended, criminally or administratively, from holding public office or from the administration or management of entities; or
- b) has been convicted of money laundering or terrorist financing offences, forgery, offences against property or against the socio-economic order, or other offences affecting his or her good reputation.

7.3 Termination and duration of the term of office

The term of office shall be of indefinite duration. The person responsible shall cease to hold office upon:

- a) loss of the requirements for his or her appointment;
- b) supervening incapacity;
- c) conviction by final judgment;
- d) resignation;
- e) termination of his or her relationship with Iqana; or
- f) a reasoned resolution of the Board of Directors.

7.4 Resources, access to information and reporting

Iqana allocates adequate resources to the management of Complaints and ensures that the person responsible has access to all relevant information and that Complaints are handled free of conflicts of interest. The person responsible reports directly to the Board of Directors on the implementation and effectiveness of the procedure, on the data referred to in section 10 and on any measures taken or to be taken.

7.5 Duty of collaboration

All areas and staff of Iqana will provide the manager with any information requested in relation to the exercise of their functions.

8. Complaints-handling procedure

8.1 Means

Complaints are submitted electronically, through the email address CSD@iqana.io.

8.2 Languages

Clients may file their Complaints in Spanish or English and, where appropriate, in any other language used by Iqana to market its services or communicate with Clients.

8.3 Content of the Complaint

The Complaint shall make it possible to identify the Complainant and, where applicable, its duly accredited representative, and shall indicate the crypto-asset service to which it relates, a description of its subject matter and of the facts, the relevant dates and, where applicable, the damage or detriment alleged. The Complainant may attach any documentation supporting its Complaint.

8.4 Optional template

Iqana makes the Template set out in Annex I available to Clients. Its use is not mandatory, and a Complaint may not be rejected solely because it was not filed using that Template.

8.5 Conditions of admissibility

The conditions of admissibility shall be fair and reasonable and shall not unduly restrict the Complainant's right to file a Complaint. Where a Complaint does not contain the minimum information necessary for it to be handled, sections 8.6 and 8.7 shall apply.

8.6 Acknowledgment of receipt and verification of admissibility

Iqana shall acknowledge receipt of the Complaint and shall, without undue delay, inform the Complainant whether it is admissible.

The acknowledgment of receipt shall include:

- a) the name and contact details, including email address, of the person or department to contact for any queries relating to the Complaint;
- b) the date of receipt of the Complaint;
- c) a reference to the timeframe for resolution provided for in section 8.8; and
- d) where the Complaint has been submitted by electronic form, a copy of it.

Where the Complaint does not meet the conditions of admissibility, Iqana shall provide the Complainant with a clear explanation of the reasons for rejecting it as inadmissible.

8.7 Investigation of the Complaint

After acknowledging receipt, Iqana shall assess, without undue delay, whether the Complaint is clear and complete and contains all the necessary information. Where the Complaint is unclear or incomplete, Iqana shall request the additional information necessary for its proper handling.

Iqana shall gather and examine all relevant information, shall not require from the Complainant information that is already in its possession or that it is legally required to hold, shall keep the Complainant duly informed of any steps taken to handle the

Complaint, and shall reply without undue delay to the Complainant's reasonable requests for information.

8.8 Decision and resolution period

The decision shall address all the points raised by the Complainant and shall state the reasons for the outcome of the investigation. It shall be consistent with any previous decision taken by Iqana in respect of similar Complaints, unless a different conclusion can be justified.

Iqana shall communicate the decision to the Complainant without undue delay and in any event no later than two (2) months from the date of receipt of the Complaint.

Where, in exceptional circumstances, the decision cannot be taken within that period, Iqana shall inform the Complainant of the reasons for the delay and the date on which the decision will be taken.

Where the decision does not satisfy, in whole or in part, the Complainant's request, Iqana shall clearly set out the reasons for its decision and shall include information on the remedies available under section 8.10.

8.9 Communication with the Complainant

Iqana shall communicate with the Complainant in clear and plain language that is easy to understand.

Communications shall be made in writing by electronic means, in the language in which the Complaint was filed, provided that it is one of the languages referred to in section 8.2.

8.10 Available remedies

Where the Complainant is not satisfied with Iqana's decision, or where the period for resolution has elapsed without a response having been received, the Complainant may contact the Complaints Service of the National Securities Market Commission (CNMV), the competent authority for the supervision of Iqana.

CNMV contact details: CNMV Complaints Service, c/ Edison, 4, 28006 Madrid; electronic filing through the CNMV Electronic Office (sede.cnmv.gob.es); investor service telephone number 900 535 015; www.cnmv.es.

9. Registration and retention of Complaints

Iqana will maintain a secure record of all Complaints received and the actions taken in response to them, and will retain such information in accordance with applicable regulations.

10. Data analysis and periodic report to the Board of Directors

Iqana shall continuously analyse data relating to the handling of Complaints, which shall include:

- a) the average processing time, for each phase of the procedure (acknowledgement of receipt, investigation and response time);
- b) the number of Complaints received and, for each phase, the number of those in which the maximum established deadlines have not been met;

- c) the categories of topics to which the Complaints relate; and
- d) the results of the investigations.

The person responsible for customer service shall submit to the Board of Directors, at least annually, a report on the application and effectiveness of the procedure, which shall include the above data together with any appropriate recommendations for improvement.

11. Internal staff training and communication

Iqana shall document the procedure, communicate it through an appropriate internal channel to all members of staff holding a relevant position and provide them with appropriate training for its proper implementation.

12. Publication and accessibility

Iqana shall publish on its website an up-to-date description of the complaints-handling procedure, together with the Template set out in Annex I, and shall ensure that both are easily accessible on its website and on any other relevant digital device used by Clients to access the crypto-asset services. Iqana shall also provide that description at the Client's request and upon acknowledging receipt of a Complaint. The description and the Template shall be published in all languages used by Iqana to market its services or communicate with Clients.

13. Protection of personal data

The processing of personal data arising from the handling of Complaints shall be carried out in accordance with Regulation (EU) 2016/679 (GDPR) and applicable legislation, and in accordance with Iqana's privacy policy.

14. Entry into force

This Policy shall take effect on the date of its approval by the Board of Directors, as indicated in the version history.

ANNEX I

Template for the filing of complaints

(to be sent by the client to Iqana Technologies, S.L.U.)

1.a. Information about the complainant

Last name(s) / Legal entity name

First name

EUID or, failing that, national registration number or identification number

Legal entity identifier (LEI), if available

Client reference (if available)

Address (street, number, floor; for legal entities, registered office)

Postcode

City

Country

Telephone

Email address

1.b. Contact details (if different from those provided in point 1.a)

Last name(s) / Legal entity name

First name

Address (street, number, floor; registered office)

Postcode

City

Country

Telephone

Email address

2.a. Information about the legal representative (if applicable)

A power of attorney or other official document accrediting the appointment of the representative must be provided in an annex.

Last name(s) / Legal entity name

First name

Registration number and LEI (if available)

Address (street, number, floor; registered office)

Postcode

City

Country

Telephone

Email address

2.b. Contact details (if different from those provided in point 2.a)

Last name(s) / Legal entity name

First name

Address (street, number, floor; registered office)

Postcode

City

Country

Telephone

Email address

3. Information about the complaint

3.a. Full reference of the crypto-asset service to which the complaint relates (name of the crypto-asset service provider, service reference number, or other references of the relevant transactions).

3.b. Description of the subject matter of the complaint. Please provide any documentation supporting the facts referred to.

3.c. Date(s) of the facts that have led to the complaint.

3.d. Description of the damage, loss or detriment caused (where relevant).

3.e. Other comments or relevant information (if applicable).

In, on the day of

SIGNATURE

COMPLAINANT / LEGAL REPRESENTATIVE OF THE COMPLAINANT

Documentation provided (check the appropriate box):

- ☐ Power of attorney or other official document as proof of the appointment of the representative
 - ☐ Copy of the contractual documents of the transactions to which the complaint relates
 - ☐ Other documents supporting the complaint
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ANNEX II

Customer service contact details

Email: CSD@iqana.io