



Internal regulation on handling complaints

1 LEGAL BASIS

1.1 This internal regulation on handling complaints has been drawn up in accordance with:

- a) Article 71 of the MiCA Regulation;
- b) DN 2025/294;
- c) Article 11 of DN 2025/305.

2 DEFINITIONS

2.1 Capitalized terms used in these internal regulations have the following meanings:

Administrative employee	is an employee of the Company's administrative department
Compliance Officer	is the person responsible for internal control within the Company
COO	is a member of the Company's management body and the Company's Chief Operating Officer;
DN 2025/294	is Commission Delegated Regulation (EU) 2025/294 of 1 October 2024 supplementing Regulation (EU) 2023/1114 of the European Parliament and of the Council with regard to regulatory technical standards specifying requirements, templates and procedures for the handling of complaints by crypto-asset service providers
DN 2025/305	is Commission Delegated Regulation (EU) 2025/305 of 31 October 2024 supplementing Regulation (EU) 2023/1114 of the European Parliament and of the Council with regard to regulatory technical standards specifying the information to be included in an application for authorisation as a crypto-asset service provider
MiCA Regulation	is Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on markets in crypto-assets and amending Regulations (EU) No 1093/2010 and (EU) No 1095/2010 and Directives 2013/36/EU and (EU) 2019/1937
Authorized persons	are any of the following persons: a) members of the Company's bodies; b) Company employees; c) third parties providing services to the Company on an outsourcing basis pursuant to Article 73 of the MiCA Regulation
Authorized person	has the meaning given in Article 7.7
Complaint received	has the meaning given in Article 7.4
Company	is the company Okazio s.r.o., with its registered office at Bottova 2A, Bratislava - Staré Mesto district 811 09, Company ID: 54 724 732, registered in the Commercial Register of the Municipal Court Bratislava III, section Sro, entry no. 163835/B

3 SUBJECT OF THE MODIFICATION OF THE INTERNAL REGULATION

3.1 This internal regulation applies to the handling of complaints from the Company's clients. This internal regulation sets out the Company's uniform and effective procedure for handling client complaints concerning the activities, correctness of actions or quality of performance of the activities of Authorised Persons.

3.2 The aim of this internal regulation is to establish effective and transparent procedures for the

appropriate, rapid and free handling of client complaints and rules for keeping records of each complaint and the measures taken to resolve it, in accordance with the requirements of the legal regulations referred to in Article 1.1.

4 DEFINITION OF BASIC TERMS

- 4.1 A complaint is an expression of dissatisfaction addressed to the Company in connection with the provision of one or more crypto-asset services to clients, potential clients or an anonymous person.
- 4.2 In the case of an anonymous submission, a complaint within the meaning of this internal regulation is an anonymous submission that contains specific, sufficiently certain and verifiable data pointing to the conduct or facts referred to in Article 4.1.
- 4.3 A complainant is a client, potential client, or anonymous person who files a complaint.
- 4.4 The term client is interpreted in accordance with Article 3(1)(39) of the MiCA Regulation.
- 4.5 A complaint is not a submission by the complainant that concerns services and activities that are not subject to supervision by the National Bank of Slovakia, or a submission that concerns services and activities of an entity other than the Company and for which the Company is not responsible. However, even in such cases, the Company will make every effort to respond to the complainant appropriately and provide the complainant with its position, or, if the Company has such information at its disposal, will refer the complainant to the exercise of his claims against the entity that is responsible for handling his complaint and for this purpose will provide the complainant with the necessary identification data of this entity.

5 CONDITIONS FOR THE ADMISSIBILITY OF A COMPLAINT

- 5.1 The complaint must be directed against activities or services provided by the Company or by employees of the Company on its behalf. The complaint cannot be directed against activities or services of entities other than the Company.
- 5.2 The client submitting the complaint must be identified in the complaint to the extent specified in Annex No. 1 to this internal regulation. This does not apply to anonymous complaints.
- 5.3 The complaint must be submitted in one of the ways specified in Article 6 of these internal regulations.
- 5.4 The subject of the complaint must be sufficiently specific. The complainant is obliged to identify and submit all evidence and means of proof related to the subject of the complaint and which are at his disposal.

6 METHODS OF SUBMITTING AND RELIABILITY OF COMPLAINTS

- 6.1 The complainant can file a complaint in the following ways:
 - a) in writing by mail sent to the address of the Company's registered office: **Okazio s.r.o.**, Bottova 2A, Bratislava - Old Town district 811 09, Slovak Republic;
 - b) orally to an employee or member of the Company's body; or
 - c) electronically by sending an e-mail to the following e-mail address of the Company

designated for filing complaints:kontakt@okazio.sk.

- 6.2 In the case of an oral complaint, the Company employee or member of the Company body who receives the oral complaint is obliged to prepare a written record of such complaint. In this way, any Company employee or member of the Company body is entitled to receive a complaint, who, upon receipt, immediately forwards such a complaint for processing to an Administrative employee, or directly to a person under Article 7.6, if the complaint is directed against an Administrative employee. The written record is prepared according to the model specified in Annex No. 1 to these internal regulations.
- 6.3 The person against whom the complaint is directed is excluded from receiving a complaint under Article 6.2.
- 6.4 A complaint or a written record of an oral complaint must contain the following information:
- a) name, surname and residential address of the complainant, if it is a natural person, name or business name, identification number and registered office of the complainant, if it is a legal person;
 - b) the contact address of the complainant if it is different from his/her place of residence in the case of a natural person or from his/her registered office in the case of a legal person;
 - c) telephone and/or email contact for the complainant;
 - d) the subject and justification of the complaint, including documents sent by the complainant (if available);
 - e) identification of the Authorized Person against whom the complaint is directed, if the complaint is directed against a specific Authorized Person (or several Authorized Persons);
 - f) the date the complaint was filed; and
 - g) the manner in which the complainant should be informed of the outcome of the complaint.
- 6.5 Filing a complaint and its handling according to this internal regulation is free of charge.
- 6.6 If the complainant has submitted documents in paper form with the complaint, these will be returned to him by the Company in an appropriate manner after the complaint has been resolved. Unless the Company agrees otherwise with the complainant, the documents will be returned to him at the address stated in the complaint. The Company is entitled to make copies of such documents.
- 6.7 The complainant may also use the complaint form attached as Annex No. 1 to this internal regulation, which will be published on the Company's website, to file a complaint.
- 6.8 The complaint may be made in Slovak, English or the official language of the host Member States of the Union.
- 6.9 This internal regulation is made available at the bottom of the Company's website <https://okazio.sk/> in the "Information" section under the "Complaints" heading. After clicking on the "Complaints" button, the visitor to the Company's website is redirected to the Company's subpage, where the text of this internal regulation is published. The visitor to the website (client or potential client) is thus informed about the possibility of filing a free complaint, as well as about the method of filing a complaint and the procedure the Company will follow when processing and handling the complaint.

7 COMPLAINT PROCESSING

- 7.1 The Administrative Employee is responsible for processing the application under this internal regulation and forwards the complaint within the meaning of this Article 7 to the relevant person for processing. The Administrative Employee is responsible for the performance of the Company's obligations under this internal regulation, unless otherwise expressly stated in this internal regulation.
- 7.2 If the complaint does not contain the elements specified in Article 6.4, the Administrative Employee will invite the complainant to supplement it. If the complaint is not supplemented within 10 days from the date of delivery of the invitation, the Company does not have to take the complaint into account.
- 7.3 Article 7.2 shall not apply in the case of an anonymous complaint. If an anonymous complaint does not contain all the elements set out in Article 6.4, the Company may not take such complaint into account.
- 7.4 The Company shall, without undue delay, no later than five working days from receipt of the complaint, assess whether the complaint is clear and complete and shall confirm in writing to the complainant the receipt of the complaint and its forwarding for processing in the event of:
- a) a complete complaint complying with the requirements of Article 6.4;
 - b) a duly completed complaint following the procedure under Article 7.2; or
 - c) incomplete complaint, which the Company decides to accept.

(hereinafter referred to as "**Complaint received**").

The written acknowledgement of receipt of the complaint shall contain in particular:

- a) information on whether the complaint is admissible;
 - b) date of receipt of the complaint;
 - c) the identification and contact details, including email address and telephone number, of the person to whom the complainant may contact with any questions related to the complaint;
 - d) an approximate indication of the time it will take to resolve the complaint; and
 - e) in the case of an electronically filed complaint, also a copy of the received complaint;
- 7.5 The procedure under Article 7.4 shall not apply in the case of an anonymous complaint.
- 7.6 If the complaint is directed against an Administrative Employee, the latter shall immediately forward it to the COO upon receipt, who shall proceed in accordance with this Article 7.
- 7.7 The Administrative Employee will forward the received complaint for processing pursuant to Article 8:
- a) The direct superior of the Company employee against whom the complaint is directed;
 - b) The COO, who is responsible for the Authorized Person, unless the Authorized Person is an employee of the Company who has a direct superior against whom the complaint is directed;
 - c) Compliance Officer, if the complaint is directed against a company executive, or if the complaint is not directed against a specific person

(hereinafter referred to as "**Authorized person**").

8 COMPLAINT HANDLING

8.1 The authorized person proceeds in the following manner when handling a complaint:

- a) It will assess the merits of the complaint by examining the documents and verifying the information provided by the complainant in the complaint, in order to objectively determine the true state of the matter, while:
 - a. also examines the causes of the identified deficiencies and their consequences;
 - b. when assessing a complaint, it is based on its subject matter, regardless of the complainant and the person against whom the complaint is directed, as well as how the complainant described it;
 - c. if only part of the submission is a complaint, it will assess it only to that extent, while it is obliged to assess all points of the complaint; and
 - d. If the complaint consists of several separate points, each of them will be assessed separately.
- b) Decides on the complaint:
 - a. by rejecting it (with reasons) if it is unfounded or inadmissible; or
 - b. accepts it and invites the Company's managers to take measures to remedy the identified deficiencies; if the COO is handling the complaint, he invites the CEO to remedy the identified deficiencies, while he himself is also obliged to act and make the correction.
- c) It shall inform the complainant, in writing or electronically, of the outcome of the handling of his complaint and the measures taken to remedy the identified deficiencies, justifying its decision. The method of informing the complainant shall be chosen taking into account the manner in which the complaint was received by the Company.

8.2 The authorized person must handle the complaint no later than 30 days from the date of delivery or acceptance of the Accepted Complaint and immediately after its handling, inform the complainant about the result of handling the complaint. In justified cases, this period may be extended to 60 days, while the specific reason for the extension of the period and the impossibility of handling the complaint is the authorized person obliged to notify the complainant within 30 days from the date of delivery or acceptance of the Accepted Complaint. The authorized person shall provide the complainant in writing, upon request or after confirmation of delivery of the complaint, with information about the procedure for handling the complaint.

8.3 The COO is obliged to take the necessary measures to eliminate the deficiencies identified on the basis of the complaint and ensure the elimination of the causes of their occurrence within 30 days of the date of the request to do so by the Authorized Person.

8.4 If the complainant is not satisfied with the manner in which the complaint was handled, he or she may file a complaint with the Commissioner within 15 calendar days of the delivery of the decision on the manner in which the complaint was handled to the complainant. Such a complaint shall be considered as a new complaint and shall be processed and handled in accordance with this internal regulation.

- 8.5 The complainant is obliged to provide the cooperation necessary for its proper handling when resolving the complaint, in particular, he is obliged to provide additional information or necessary documents upon request. Provided that the complainant does not provide this cooperation, the Authorized Person shall suspend the handling of the complaint until the complainant provides cooperation. During the interruption of the handling of the complaint, the 30-day or 60-day period set out in this internal regulation for handling the complaint shall not expire. The Authorized Person is entitled to set a reasonable period of time for the complainant to provide cooperation, at least 30 days. The Company shall inform the complainant of the steps taken in handling the complaint. In the event of questions from the complainant, the Company shall inform him without undue delay.
- 8.6 When handling complaints, the Commissioner shall proceed in accordance with previous decisions on similar complaints. A previous decision on a similar complaint may be departed from, but such departure must be duly and convincingly justified.
- 8.7 The designated person has sufficient resources and access to all information related to the complaint and which has an impact on its handling when handling the complaint.
- 8.8 The Commissioner will make every effort to gather and review all available relevant information regarding the complaint. The Commissioner will not request information or documents from the complainant that are already in his/her possession when handling the complaint.
- 8.9 The Commissioner shall use non-technical, simple and understandable language when communicating with the complainant or when handling complaints. The Commissioner shall communicate with the complainant and handle the complaint in the language in which the complaint was filed.
- 8.10 If the Commissioner does not comply with the complaint or only partially complies with it, he must clearly and comprehensibly justify his decision to handle the complaint and inform the complainant about the available means of redress.
- 8.11 The Commissioner shall keep a record of the handling of a complaint pursuant to this Article 8.

9 REPEATED COMPLAINT

- 9.1 A repeated complaint is a complaint by the same complainant, in the same matter, if it does not contain new facts.
- 9.2 In the event of a repeated complaint, the Commissioner will review the record of the previous complaint and then:
- a) if it finds that the previous complaint was handled correctly, it will notify the complainant of this fact in writing with a comprehensive justification of its position and an instruction that a further repeated complaint will not be taken into account and at the same time it will instruct the complainant about the possibility of contacting the relevant public authorities in this matter, in particular the National Bank of Slovakia as the authority supervising the activities of the Company and, if applicable, another public authority which, depending on the nature of the complaint, may deal with the complaint in question within the meaning of its competences granted by the relevant legal regulations; or
 - b) if it finds that the previous complaint was not handled correctly, it will handle the complaint in accordance with the procedure set out in Article 8.

10 COMPLAINTS REGISTER

- 10.1 The records of complaints, records of complaint handling and documentation related to complaints are kept by the Administrative Employee. These records are kept in accordance with the Company's internal regulations on record keeping. In the case of physical documents (including complaints submitted in writing), the Administrative Employee converts them into electronic form and stores these documents in electronic form in accordance with the previous sentence.
- 10.2 The record pursuant to Article 10.1 shall include in particular:
- a) the name, surname and residential address of the complainant, if it is a natural person, the name or business name and registered office of the complainant, if it is a legal person;
 - b) the contact address of the complainant if it is different from his/her place of residence in the case of a natural person or from his/her registered office in the case of a legal person;
 - c) telephone and/or email contact for the complainant;
 - d) identification of the Authorized Person;
 - e) the subject of the complaint, including the documents sent by the complainant;
 - f) against whom the complaint is directed;
 - g) date of delivery or receipt of the complaint;
 - h) complaint processing procedure;
 - i) the procedure for assessing the complaint and the manner in which it was handled (including the response sent to the complainant);
 - j) if the complaint was justified, the measures taken to eliminate the identified deficiencies;
 - k) date of complaint resolution;
 - l) a list of the documents on the basis of which the decision on the complaint was made.
- 10.3 After each complaint is resolved, regardless of the method of resolution, the Company continuously analyzes the reasons that led the complainant to file a complaint. In the event that the Company identifies a recurring reason for filing a complaint, it will assess whether this reason for filing a complaint also affects other processes within the Company or other products or services of the Company, even if they have not been the subject of any complaint so far. The Company will then take the necessary steps to arrange a remedy in such a way that this reason for filing a complaint is eliminated to the greatest extent possible. The COO is responsible for arranging a remedy according to the previous sentence.
- 10.4 The company continuously analyzes and evaluates:
- a) the average time taken to fully handle a complaint, including confirmation, investigation and response times;
 - b) the number of complaints received, including complaints that the Company did not handle in a timely manner;
 - c) the categories of topics to which the complaints relate; and
 - d) results of complaints handling.
- 10.5 The administrative employee shall regularly, but at least once a year, submit to the COO a report on the implementation and effectiveness of the complaint handling procedures under this internal regulation, which shall include information pursuant to Article 10.4 of this internal regulation as well as information on any corrective measures taken or to be taken following the conclusions arising from the complaint handling.

11 ACCESS TO INTERNAL REGULATION

- 11.1 The company, pursuant to Article 1(3) of DN 2025/294, makes this internal regulation available to clients on its website.

12 RESPONSIBILITY

- 12.1 The Administrative Employee is responsible for fulfilling the obligations under this internal regulation. This is without prejudice to any provisions of this internal regulation that specifically attribute a particular responsibility to another function within the Company.
- 12.2 In the event that, for any reason, the Administrative Employee is not responsible for fulfilling the obligations under this internal regulation pursuant to Article 12.1 of this internal regulation, the COO will be responsible for complying with the obligations under this internal regulation.
- 12.3 The responsible person referred to in Article 12.1 is obliged to keep records of all activities, events and activities carried out pursuant to this internal regulation.

13 FINAL PROVISIONS

- 13.1 The Company's managers are jointly responsible for monitoring the proper implementation of the procedures and obligations set out in these internal regulations.
- 13.2 If an Administrative Employee discovers any violation of this internal regulation within the scope of his/her duties, he/she shall inform the COO thereof without undue delay.
- 13.3 This internal regulation was approved by the decision of the directors on June 20, 2025, and it also enters into force on this date.
- 13.4 This internal regulation shall enter into force on the date of the decision of the National Bank of Slovakia granting the Company a license to provide crypto-asset services.

In Bratislava, on August 10, 2026

A handwritten signature in blue ink, consisting of a large, stylized 'M' followed by a horizontal line extending to the right.

Okazio s.r.o.

Martin Bittara, Managing Director

ANNEX No. 1
COMPLAINT FORM

Okazio s.r.o. Complaint form	
<u>1.A - Complainant</u>	
Name and surname / business name:	
Client reference number, if available:	
ID: ¹	
Residential address / Registered office: (street, registration number, postal code)	
State:	
Contact address: ²	
Phone number:	
Email:	
LAW: ³	
Please indicate how you would like to be informed about the handling of your complaint. (electronically by e-mail or by post):	
<u>1.B – Contact details (fill in only if different from the details in point 1.A)</u>	
Name and surname / business name:	
Residential address / Registered office: (street, registration number, postal code)	
State	
ID: ⁴	
Phone number:	
Email:	
<u>2.A - Represented:⁵</u>	

¹To be completed only if the complainant is a legal entity.

²Fill in only if this address is different from the address of residence / registered office.

³Complete only if the complainant has been assigned an LEI.

⁴To be completed only if the complainant is a legal entity.

⁵The complainant only fills in this information if he/she is not filing the complaint on his/her own behalf. In such a case, the complainant is also required to submit a document proving representation and authorization to act on behalf of the complainant (e.g. power of attorney).

Name and surname / business name of the representative:	
Representative's birth number / ID number:	
Residential address / Registered office: (street, registration number, postal code)	
LAW: ⁶	
Phone number:	
Email:	
<u>2.B – Contact details of the representative (fill in only if different from the details in point 2.A)</u>	
Name and surname / business name:	
Residential address / Registered office: (street, registration number, postal code)	
State	
ID: ⁷	
Phone number:	
Email:	
<u>3. - Complaint</u>	
3.A - Full reference to the cryptoasset service to which the complaint relates (i.e. name of the cryptoasset service provider, cryptoasset service reference number or other references to the relevant transactions)	
Identification of the person against whom the complaint is directed:⁸	
3.B - Description of the subject of the complaint⁹	

⁶Fill in only if the representative has been assigned an LEI.

⁷To be completed only if the complainant is a legal entity.

⁸Only fill in if the complaint is directed against a specific person.

⁹Please submit all documents and evidence that prove the claims stated in the grounds of the complaint and that are known to you.

3.C - Date(s) relating to the facts giving rise to the complaint:	
3.D - Description and amount of damage caused:¹⁰	
3.E - Any other comments or relevant information:	
In _____, on _____ _____ Signature of the complainant or his representative	

Documentation submitted (tick the appropriate box):

Power of attorney or other official document proving the appointment of a representative	
A copy of the contractual documents related to the investments to which the complaint relates	
Other documents supporting the complaint:	

¹⁰Only fill in if damage has been caused.