

## INTERNAL REGULATION ON THE HANDLING OF COMPLAINTS

## 1 LEGAL BASIS

1.1 This internal regulation on complaint handling 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 Capitalised terms used in this internal regulation have the following meanings:

Administrative employee	is an employee of the Company's administrative department
COO	is a member of the board of directors and chief operating officer of the Company
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 the requirements, templates and procedures for handling 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 to perform the function of a crypto-asset service provider
MiCA Regulation	is Regulation (EU) 2023/1114 of the European Parliament and of the Council (EU) 2023/1114 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
Authorised persons	are any of the following persons: a) members of the Company's bodies; b) employees of the Company; c) third persons providing services Companies on the basis of outsourcing pursuant to Article 73 of the MiCA Regulation
Authorised person	has the meaning specified in Article 7.7
Complaint received	has the meaning specified in Article 7.4
Company	is Madison Six j. s. a., with its registered office at Slávičie údolie 106, 811 02 Bratislava - Staré Mesto district, Slovak Republic, ID No.: 56 856 229, registered in the Commercial Register of the Municipal Court Bratislava III, section Sja, file no. 381/B
Internal Auditor	is a person responsible for internal control within the Company to the extent specified by the Company's organisational rules

### 3 SUBJECT OF THE INTERNAL REGULATION

- 3.1 These internal regulations apply to the handling of complaints from the Company's clients. These internal regulations establish a uniform and effective procedure for the Company to handle complaints from clients concerning the activities, correctness of conduct or quality of performance of Authorised Persons.
- 3.2 The purpose of this internal regulation is to establish effective and transparent procedures for the appropriate, prompt 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 understood to be 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 anonymous persons.
- 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 and sufficiently certain and verifiable information referring to the conduct or facts referred to in Article 4.1.
- 4.3 The complainant is a client, potential client or anonymous person who submits the 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 a complainant concerning services and activities that are not subject to supervision by the National Bank of Slovakia, or a submission concerning 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 endeavour to respond to the complainant appropriately and provide the complainant with its opinion, or, if the Company has such information at its disposal, it will refer the complainant to the entity responsible for handling their complaint and provide the complainant with the necessary identification details of that entity for this purpose.

### 5 CONDITIONS FOR THE ADMISSIBILITY OF COMPLAINTS

- 5.1 The complaint must be directed against the activities or services provided by the Company or its employees on its behalf. The complaint may not be directed against the activities and 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 1. to this internal regulation. This does not apply to complaints submitted anonymously.
- 5.3 Complaints must be submitted in one of the ways specified in Article 6 of these internal

regulation.

- 5.4 The subject matter of the complaint must be sufficiently specific. The complainant is obliged to identify and submit all evidence and means of evidence related to the subject matter of the complaint and available to them.

## 6 METHODS OF SUBMITTING AND REQUIREMENTS FOR COMPLAINTS

- 6.1 The complainant may submit a complaint in the following ways:

- a) in writing by post to the Company's registered office: Madison Six j. s. a., Slávičie údolie 106, Bratislava - Staré Mesto district 811 02, Slovak Republic;
- b) verbally to an employee or member of the Company's body; or
- c) electronically by sending an email to the following email address of the Company designated for submitting complaints:staznosti@madisonsix.sk .

- 6.2 In the case of a verbal complaint, the Company employee or member of the Company body who receives the verbal complaint is obliged to make a written record of such complaint. In this way, any Company employee or member of a Company body is authorised to receive a complaint and, upon receipt, immediately forward it for processing to the Administrative Employee or directly to the person referred to in Article 7.6 if the complaint is directed against the Administrative Employee. The written record shall be drawn up in accordance with the template set out in Annex 1 to these internal rules.

- 6.3 The person against whom the complaint is directed shall be excluded from the receipt of the complaint pursuant to Article 6.2.

- 6.4 The complaint or written record of the oral complaint must contain the following information:

- a) the name, surname and address of the complainant, if a natural person, or the name or business name, identification number and registered office of the complainant, if a legal person;
- b) the complainant's contact address, if different from their place of residence in the case of a natural person or from their registered office in the case of a legal entity;
- c) the complainant's telephone and/or email contact details;
- d) subject and justification of the complaint, including any documents sent by the complainant (if available available);
- e) the identification of the Authorised Person against whom the complaint is directed, in the case of a complaint against a specific Authorised Person (or several Authorised Persons);
- f) the date of filing the complaint; and
- g) the manner in which the complainant is to be informed of the outcome of the complaint.

- 6.5 The submission and handling of complaints under this internal regulation is free of charge.

- 6.6 If the complainant has submitted documents and records in paper form together with the complaint, these will be returned to them by the Company in an appropriate manner after the complaint has been dealt with. Unless the Company agrees otherwise with the complainant, it will return the documents and records to the address provided 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 these internal regulations, which is also published on the Company's website [here](#).

6.8 Complaints may be submitted in Slovak, Czech or English.

## 7 COMPLAINT PROCESSING

7.1 An administrative employee is responsible for processing requests in accordance with these internal regulations and forwards complaints within the meaning of Article 7 to the relevant person for resolution. The administrative employee is responsible for performing the Company's obligations under these internal regulations, unless expressly stated otherwise in these internal regulations.

7.2 If the complaint does not contain the information specified in Article 6.4, the Administrative Employee shall request the complainant to supplement it. If the complaint is not supplemented within 10 days of the date of delivery of the request, the Company may disregard the complaint.

7.3 Article 7.2 shall not apply in the case of anonymous complaints. If an anonymous complaint does not contain all the requirements specified in Article 6.4, the Company may disregard such a complaint.

7.4 The Company shall, without undue delay, within five working days of receiving the complaint, assess whether the complaint is clear and complete and confirm in writing to the complainant that the complaint has been received and forwarded for processing in the case of:

- a) a complete complaint meeting the requirements under Article 6.4;
- b) a duly supplemented complaint after applying the procedure under Article 7.2; or
- c) an incomplete complaint that the Company decides to accept.  
(hereinafter referred to as "Accepted Complaint").

The written confirmation of receipt of the complaint shall include, in particular:

- a) information on whether the complaint is admissible;
- b) the date of receipt of the complaint;
- c) the identification and contact details, including e-mail address and telephone number, of the person the complainant may contact with any questions relating to the complaint;
- d) an approximate indication of the time required to process the complaint; and
- e) in the case of a complaint submitted electronically, a copy of the complaint received;

7.5 The procedure under Article 7.4 shall not apply in the case of anonymous complaints.

7.6 If the complaint is directed against an Administrative Employee, the latter shall always forward it immediately upon receipt to the Company's COO, who shall proceed in accordance with this Article 7.

7.7 The Administrative Employee shall forward the received complaint for handling in accordance with Article 8:

- a) The direct superior of the Company employee against whom the complaint is directed;
- b) The Company's COO, who is responsible for the Authorised Person, if they are not an employee who has a direct superior against whom the complaint is directed;
- c) The internal auditor, if the complaint is directed against a member of the Company's Board of Directors or if the complaint is not directed against a specific person

(hereinafter referred to as the "Authorised Person").

## 8 COMPLAINT HANDLING SCHEDULE

8.1 The Authorised Person shall proceed as follows when handling a complaint:

- a) They shall assess the merits of the complaint by reviewing the documents and verifying the information provided by the complainant in the complaint, in order to objectively determine the actual state of affairs, while:
  - a. also examining the causes of the identified shortcomings and their consequences;
  - b. when assessing the complaint, they shall base their assessment on its subject matter, regardless of the complainant and the person against whom the complaint is directed, as well as how the complainant has described it;
  - c. if only part of the submission is a complaint, it shall assess it only to that extent, while being obliged to assess all points of the complaint; and
  - d. if the complaint consists of several separate points, it shall assess each of them separately.
- b) It shall decide on the complaint:
  - a. and its rejection (stating reasons), if is unfounded or inadmissible; or
  - b. accept it and call on the members of the Company's Board of Directors to take measures to remedy the identified shortcomings; if the complaint is handled by the Company's COO, he shall call on the Company's CEO to remedy the identified shortcomings, while he himself is also obliged to act and take corrective measures.
- c) He shall inform the complainant, in writing or electronically, of the outcome of the complaint and the measures taken to remedy the identified shortcomings, giving reasons for his 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 authorised person must handle the complaint within 30 days of its delivery or receipt and inform the complainant of the outcome of the complaint immediately after it has been handled. In justified cases, this period may be extended to 60 days, in which case the specific reason for the extension and the impossibility of handling the complaint within 30 days of the date of delivery or receipt of the complaint must be communicated to the complainant by the authorised person. Upon request or after confirmation of receipt of the complaint, the authorised person shall provide the complainant with written information on the procedure for handling the complaint.

8.3 The Company's COO is obliged to take the necessary measures to remedy the shortcomings identified on the basis of the complaint and to ensure that the causes of their occurrence are eliminated within 30 days of being requested to do so by the Authorised Person.

8.4 If the complainant is not satisfied with the manner in which the complaint has been handled, they may lodge a complaint with the Authorised Person within 15 calendar days of receiving the decision on

the manner in which the complaint was handled. Such a complaint shall be treated as a new complaint and shall be processed and handled in accordance with these internal regulations.

- 8.5 When resolving a complaint, the complainant is obliged to provide the cooperation necessary for its proper handling, in particular, they are obliged to provide additional information or necessary documents upon request. If the complainant fails to provide such cooperation, the Authorised Person shall suspend the handling of the complaint until the complainant provides the cooperation. During the suspension of the handling of the complaint, the 30-day or 60-day period specified in these internal regulations for handling complaints shall not run. The Authorised Person is entitled to set a reasonable time limit, of at least 30 days, for the complainant to provide cooperation. 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 them without undue delay.
- 8.6 When handling complaints, the authorised person shall proceed in accordance with previous decisions on similar complaints. It is possible to deviate from a previous decision on a similar complaint, but such deviation must be duly and convincingly justified.
- 8.7 When handling complaints, the authorised person has the necessary resources at their disposal, including technical resources such as an assigned computer/laptop/mobile phone, as well as other technical, human or financial resources necessary for handling complaints and access to all information relating to the complaint and affecting its handling. The authorised person shall devote sufficient time to handling complaints, and shall generally handle complaints received between 9:00 and 12:00 each day.
- 8.8 The authorised person shall make every effort to collect and review all available relevant information relating to the complaint. When handling a complaint, the authorised person shall not request information or documents from the complainant that are already available.
- 8.9 The authorised person shall use non-technical, simple and understandable language when communicating with the complainant or handling complaints. The authorised person shall communicate with the complainant and handle the complaint in the language in which the complaint was submitted.
- 8.10 If the Authorised Person does not uphold the complaint or only upholds it in part, they must clearly and comprehensively justify their decision on the handling of the complaint and inform the complainant of the available remedies.
- 8.11 The Authorised Person shall make a record of the handling of the complaint in accordance with this Article 8.

## 9 REPEATED COMPLAINT

- 9.1 A repeated complaint is a complaint from the same complainant on the same matter, unless it contains new facts.
- 9.2 In the case of a repeated complaint, the Authorised Person shall review the record of the previous complaint and then:
- a) if they find that the previous complaint was handled correctly, they shall notify the complainant of this fact in writing

the complainant with a comprehensive justification of its position and a warning that any further repeated complaints will not be considered, while also informing the complainant of the possibility of referring the matter to the relevant public authorities, in particular the National Bank of Slovakia as the authority supervising the Company's activities and, where appropriate, another public authority which, depending on the nature of the complaint, may deal with the complaint within the scope of its powers granted by the relevant legislation; or

- b) if it finds that the previous complaint has not been handled correctly, it shall handle the complaint in accordance with the procedure in accordance with Article 8.

## 10 RECORDING OF COMPLAINTS

10.1 Records of complaints, records of complaint handling and documentation related to complaints are kept by the Administrative Officer. These records shall be kept in electronic form in accordance with the Company's internal regulations on record keeping. In the case of physical documents (including complaints submitted in writing), the Administrative Officer shall convert them into electronic form and store them in electronic form in accordance with the previous sentence.

10.2 The record referred to in Article 10.1 shall contain, in particular:

- a) the name, surname and address of the complainant, if a natural person, or the name or business name and registered office of the complainant, if a legal person;
- b) the complainant's contact address, if different from their place of residence in the case of a natural person or from their registered office in the case of a legal entity;
- c) the complainant's telephone and/or e-mail contact details;
- d) identification of the Authorised Person;
- e) the subject of the complaint, including any documents sent by the complainant;
- f) against whom the complaint is directed;
- g) the date of delivery or receipt of the complaint;
- h) complaint handling 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 remedy the identified shortcomings;
- k) the date of resolution of the complaint;
- l) list of documents on the basis of which the decision on the complaint was made.

10.3 After each complaint has been dealt with, regardless of the method of resolution, the Company continuously analyses the reasons that led the complainant to file the complaint. If the Company identifies a recurring reason for filing a complaint, it will assess whether this reason also affects other processes within the Company or other products or services of the Company, even if they have not yet been the subject of any complaints. The Company will then take the necessary steps to remedy the situation so that the reason for the complaint is eliminated as far as possible. The Company's COO is responsible for remedying the situation in accordance with the previous sentence.

10.4 The Company continuously analyses and evaluates:

- a) the average time required to fully resolve a complaint, including the time for confirmation, investigation and response;
- b) the number of complaints received, including complaints that the Company did not handle in a timely manner;
- c) categories of issues covered by complaints; and
- d) the results of the handling of complaints.

10.5 The administrative employee shall regularly, but at least once a year, submit a report to the Company's COO on the implementation and effectiveness of the complaint handling procedures under this internal regulation, which shall include the information specified in Article 10.4 of this internal regulation as well as information on all corrective measures that have been or are to be taken in response to the conclusions drawn from the handling of complaints.

## 11 ACCESS TO INTERNAL REGULATIONS

11.1 Pursuant to Article 1(3) of DN 2025/294 and in accordance with Article 6.7, the Company makes these internal regulation to clients on its website [here](#).

## 12 RESPONSIBILITY

12.1 The Administrative Employee is responsible for fulfilling the obligations under this internal regulation. This does not affect any provisions of this internal regulation that specifically assign specific responsibilities to another function within the Company.

12.2 If, 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 shall be responsible for complying with the obligations under this internal regulation.

12.3 The person specified in Article 12.1 is responsible for keeping records of all activities, events and actions performed in accordance with this internal regulation.

## 13 FINAL PROVISIONS

13.1 The members of the Company's Board of Directors are jointly responsible for monitoring the proper implementation of the procedures and obligations set out in this internal regulation shall be the joint responsibility of the members of the Company's Board of Directors.

13.2 If an administrative employee discovers any violation of this internal regulation within the scope of their authority, they shall inform the COO without undue delay.

13.3 This internal regulation was approved by a decision of the Board of Directors on 28 July 2025 and shall enter into force on that date.

13.4 This internal regulation shall take effect on the date of legal validity of the decision of the National Bank of on granting the Company a licence to provide crypto-asset services.

ANNEX NO. 1  
COMPLAINT FORM

Madison Six j. s. a. Complaint form	
<b><u>1.A - Complainant</u></b>	
<b>First name and surname / business name:</b>	
<b>Client reference number, if available:</b>	
<b>Company ID number:<sup>1</sup></b>	
<b>Residential address / Registered office: (street, house number / orientation number, postcode)</b>	
<b>Country:</b>	
<b>Contact address:<sup>2</sup></b>	
<b>Telephone number:</b>	
<b>Email:</b>	
<b>LEI: <sup>3</sup></b>	
<b>Please indicate how you would like to be informed about the outcome of your complaint (electronically by e-mail or in writing by post):</b>	
<b><u>1.B – Contact details (only fill in if if different from the details in point 1.A)</u></b>	
<b>First name and surname / business name:</b>	
<b>Address of residence / Registered office: (street, house number / orientation number, postcode)</b>	
<b>Country</b>	
<b>Company ID number: <sup>4</sup></b>	
<b>Telephone number:</b>	
<b>E-mail:</b>	

<sup>1</sup> Fill in only if the complainant is a legal entity.

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

<sup>3</sup> Fill in only if the complainant has been assigned an LEI.

<sup>4</sup> Fill in only if the complainant is a legal entity.

<b>2.A - Represented by:<sup>5</sup></b>	
First name and surname/business name of representative:	
Birth number / Company ID number of the representative:	
Address of residence / Registered office: (street, house number / orientation number, postcode)	
LEI: <sup>6</sup>	
Telephone number:	
E-mail:	
<b>2.B – Contact details of representative (fill in only if different from the details in point 2.A)</b>	
First name and surname / business name:	
Address of residence / Registered office: (street, house number / orientation number, postcode)	
Country	
Company ID number: <sup>7</sup>	
Telephone number:	
E-mail:	
<b>3. - Complaint</b>	
3.A - Full reference to the crypto-asset service to which the complaint relates (i.e. name of the crypto-asset service provider, reference number of the crypto-asset service or other references to the relevant transactions)	
Identification of the person against whom the complaint is directed: <sup>8</sup>	

<sup>5</sup> The complainant shall fill in this information only if they are not filing the complaint on their own behalf. In such a case, the complainant is also required to submit a document proving their representation and authorisation to act on behalf of the complainant (e.g. power of attorney).

<sup>6</sup> Fill in only if the representative has been assigned an LEI.

<sup>7</sup> Fill in only if the complainant is a legal entity.

<sup>8</sup> Fill in only if the complaint is directed against a specific person.

<b>3.B - Description of the subject matter of the complaint<sup>9</sup></b>	
<b>3.C - Date(s) related to the facts that led to the complaint:</b>	
<b>3.D - Description and amount of damage caused:<sup>10</sup></b>	
<b>3.E - Other comments or relevant information:</b>	
<p>In _____, on _____</p>  <hr/> <p><b>Signature of the complainant or their representative</b></p>	

Documentation submitted (tick the appropriate box):

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

<sup>9</sup> Please submit all evidence and documents supporting the claims made in the grounds for the complaint and which are known to you.

<sup>10</sup> Complete only if damage has been caused.