

COMPLAINT POLICY

1. Purpose

The purpose of this policy is to define the handling and processing of client complaints and feedback (both negative and positive) in relation to services provided by **Sureswipe PLC** and distributed by **Noemon Money Ltd** (“NML”).

2. Scope

This policy covers client complaints received via inbound phone calls, outbound phone calls, e-mails, faxes and letters addressed to NML. It applies exclusively to the distribution and customer support services provided by NML in its capacity as an **Electronic Money Distributor (EMD)** of **Sureswipe PLC**.

This policy does not cover general service requests or queries unrelated to complaints or feedback.

3. Responsibilities

Business Development (NML)

- Responsible for receiving client complaints, recording negative/positive client feedback on the Client Feedback Form (Appendix), and making every effort to resolve complaints or escalate feedback appropriately to **Sureswipe PLC**.

Senior Management (NML)

- Responsible for ensuring that adequate human and technical resources, staff training, and escalation procedures are in place to handle and record client complaints efficiently and courteously.
- Ensures that unresolved complaints are promptly escalated to **Sureswipe PLC**, which remains ultimately responsible as the licensed Electronic Money Institution.

Internal Audit / Compliance (NML)

- Must perform periodic reviews of resolved and unresolved complaints to ensure that this policy is applied effectively.
- Ensures that reporting obligations to **Sureswipe PLC** and regulators are fulfilled.

4. Policy Statement

NML must ensure that client complaints are handled and responded to in a timely and professional manner, consistent with applicable regulatory requirements under

PSD2/EMI rules.

All personnel involved in handling client complaints or feedback must follow the complaint-handling process in order to:

- Identify and eliminate causes of client dissatisfaction;
- Improve service delivery and communication;
- Provide clear escalation channels to **Sureswipe PLC** where required.

Personnel involved in complaint-handling will be:

- Encouraged to listen to clients and accept input to improve satisfaction, services, and processes;
- Empowered to resolve complaints at first contact where possible, within the remit of NML's distributor role;
- Provided with the necessary authority, information, and tools to log complaints, escalate them to **Sureswipe PLC**, and follow up;
- Required to document complaints accurately in the Client Complaint Database (internal system).

5. Procedures and Targets

- Complaints should be resolved at first contact **where possible (target: 90%)**.
- All complaints must be acknowledged and recorded, and resolved within **2 business days**, unless escalation to **Sureswipe PLC** is required.
- Proper documentation must be maintained using the Client Complaint Form (external) and the internal Complaint Logging Form (Appendix).
- Complaint data must be logged against the client's profile within the company system.
- Complaints that cannot be resolved by NML must be escalated to **Sureswipe PLC** without undue delay.

6. Senior Management Role

Senior Management will ensure:

- Regular training for staff involved in complaint handling;
- Updated communication of common issues, service defects, and approved

resolutions;

- Monitoring of sales/marketing campaigns to pre-empt likely sources of complaints.

7. Monitoring and Reporting

- Client complaint/feedback surveys will be conducted to measure satisfaction after complaint handling.
- Complaint-handling performance reports (weekly/monthly) will be generated and compared against defined goals.
- Summarised reports of complaints and resolutions will be shared with **Sureswipe PLC** for regulatory compliance and oversight.