

StoneX Digital International Limited Complaints Policy

Version 4.0
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For External Dissemination

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4.0	Anne Marie Flynn	Pre-Submission Update	TBC

1. Definitions

This Conflicts of Interest Policy (“**Policy**”) references the following terms:

- “**MiCAR**” is the 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 (Text with EEA relevance) (Markets in Crypto-Assets Regulation);
- “**Commission Delegated Regulation**” is the 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 the handling of complaints by the crypto-asset service providers; and
- “**CPC Addendum**” is the Addendum to the Consumer Protection Code for issuers of Asset Reference Tokens, issuers of E-Money token, issuers of other crypto assets, and for Crypto-Asset Service Providers, published by the Central Bank of Ireland (the “**Central Bank**”) in December 2024.

2. General Information

StoneX Digital International Limited (“**SDI**” or “**the Firm**”) was incorporated in Ireland on 08 November 2023. The Firm is authorised with the Central Bank as a Crypto-Asset Service Provider (“**CASP**”) authorisation under MiCAR, having previously registered with the Centr Bank as a Virtual Asset Service Provider (“**VASP**”) under the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 (as amended) (“**CJA**”).

The Firm’s Board of Directors (“**the Board**”) has adopted and approved this Complaints Policy.

This Policy will be made available on StoneX.com.

3. Purpose of Policy

The Firm is required to ensure that all customer complaints are handled in accordance with the requirements of the MiCAR and its associated delegated regulations and the expectations of the Central Bank.

The purpose of this Policy is to set out the Firm’s approach to handling customer complaints and to ensure that complaints are handled in line with regulatory expectations at all times. This Policy should be read in association with relevant regulatory guidance and rules, which will be either referred to or linked. It is not meant to be exhaustive as situations will inevitably arise which are not referenced in the Policy, and therefore, as appropriate, specific guidance should be sought from Compliance.

The Firm will ensure that all complaints received from clients and counterparties are reviewed and resolved in a clear, fair and prompt manner. Submission and handling of a complaint is free of any fees or charges.

Complaints may be submitted in to the Firm by post or email via the following addresses and in English:

Head of Compliance
3rd Floor, Portview House,
Thorncastle Street,
Dublin 4, Ireland
[SDICompliance@StoneX.com]

Complaints may also be made by phone or fax via the following numbers:

Phone: +353 1 634 9140
Fax: +353 1 634 9796

4. Regulatory Requirements

This Policy incorporates the regulations, principles and objectives set out by the Central Bank and MiCAR. This Policy applies to all employees and agents of the Firm, including any legal person who acts on behalf of the Firm, including, but not limited to, contractors and sub-contractors, all of whom should at all times observe appropriate standards.

Those to whom this Policy applies should familiarise themselves with its requirements and not engage in any behaviour which may be a breach of its provisions. Violations of this Policy are taken seriously and may result in the invocation of the Firm's disciplinary process. If there is any breach of a regulation or law, the Firm is obliged to notify the applicable regulator or law-enforcement agency.

Central Bank expectations – complaints handling

The Firm's clients are exclusively sophisticated and institutional investors, who under the second Markets in Financial Instruments Directive ("MiFID II") client classifications would be characterised as Professional Clients or Eligible Counterparties. As a result, the Firm does not directly apply the provisions of the Central Bank Consumer Protection Code 2012, but takes elements of it as best practice.

MiCAR – complaints rules

The MiCAR complaints rules referred to in Art. 71 of MiCAR are set out in the Commission Delegated Regulation.

Complaints may be submitted using the template in Annex 1 to this Policy.

5. Application and Scope

This Policy incorporates the regulations, principles and objectives set out by the Central Bank and MiCAR. This Policy applies to all employees and agents of the Firm, including any legal person who acts on behalf of the Firm, including, but not limited to, contractors and sub-contractors, all of whom should at all times observe appropriate standards.

6. Process for Complaints Handling

Summary of handling process

Upon receipt of a complaint, the Firm will apply a 24 hour service level to acknowledge and register that complaint in line with Art. 4 of the Commission Delegated Regulation. Final responses to complaints will be provided within 8 weeks.

Where a complaint does not meet the criteria for admissibility set out in Section 7, the Firm will respond to the complainant within those 24 hours of receipt, providing the complainant with a clear explanation of the reasons for its inadmissibility.

The Firm will include the following information within the acknowledgement:

- i. the name, identity and contact details, including email address and telephone number of the person to whom the complainant can address any query related to their complaint;
- ii. the date of receipt of the complaint;
- iii. the timeline within which the complaint will be handled including acknowledging receipt of the complaint (2 months); and
- iv. a copy of the completed template in Annex 1 as filed by the client, along with clear confirmation of the date of receipt.

The Firm's Compliance Department will manage the assessment of, and responses to, complaints received.

Without undue delay, Compliance will assess the complaint for the following:

- i. whether the complaint is clear and complete and contains all relevant information and evidence; and
- ii. whether the complaint is admissible.

If the complaint does not contain all of the relevant information and evidence needed for appropriate handling of the complaint, further information or evidence will be requested from the client. The complaint must be acknowledged within 24 hours of receipt. In the event that the client requests extra information related to the complaint, this will be provided where the request is reasonable.

Once the complaint has been deemed as admissible, Compliance will gather and examine all of the relevant evidence regarding the complaint. Where extra time or steps are required to adequately respond to the complaint, the client must be promptly informed.

Decisions on complaints must be communicated to the client as soon as practically possible and at latest, within 2 months of receipt. If a final response cannot be provided within 2 months, the complainant must be informed of the reasons for the delay and provided with a specified date for completion.

Where a complaint is wholly or partially rejected following consideration by the Compliance Department, this reasoning must be communicated to the client in the final response along with any information on available remedies and be supported by the information underpinning this response. Responses will be provided via email, or where the client requests, by post.

7. Policy Statement of Commitment and Admissibility

The Firm is committed to dealing with all client complaints in a fair, consistent and prompt manner. Each complaint received will be investigated competently and diligently. Complaints that require a final decision will be assessed impartially and independently of the business. The Firm further commits to communicating in clear and easy to understand language.

Nonetheless, the Firm's position is that formal complaints should in most cases be a last resort, and that given the sophisticated/institutional nature of the client base, most disputes can be resolved without the submission of formal complaints.

The Firm's position is that admissible complaints are those which:

- i. allege specific and quantifiable detriment (whether financial or otherwise); and
- ii. are allegedly caused by failure of SDI to:
 - a. provide its products and services in the manner to which a client should reasonably expect;
 - or
 - b. otherwise comply with the terms of business provided to a client.

8. Client Money and Digital Assets

In order to comply with Central Bank requirements around client money and client Digital Assets, the Firm must consider whether any complaint or dissatisfaction has an impact on the Firms' client money reconciliations.

As part of any complaint review, compliance must make an determination as to whether the Firm's client money/virtual assets position may be impacted at stage two of the complaint process. If any potential impact

is identified, the complaint is referred to the Head of Client Asset Oversight (the HCAO) and the Head of Digital Operations, where a judgement will be made on any implications for the Firm. SDI must ensure that any decision from the HCAO is documented and included in MI reporting to the Board.

9. Time Limits

The following time limits apply to complaints received:

- **Acknowledgement and registration** – 24 working hours.
- **Final response** – 2 months (unless the complainant has been notified that resolution will take longer).

10. Data Protection Complaints

Data protection is regulated by the Data protection Commission (“**DPC**”) and not the Central Bank, therefore the manner and timelines in which SDI deals with these types of complaints may differ.

Any complaint relating to the use of personal data should be promptly referred to the Data Protection Officer (“**DPO**”) who will process the complaint in line with the requirements of the DPC.

11. Goodwill Gestures

In certain circumstances, the Firm may wish to offer clients a goodwill gesture to resolve a complaint. These should be reviewed on a case-by-case basis and any amount awarded must be proportionate to the nature of the dissatisfaction and the potential cost to the Firm. Each case handler should check the de minimis thresholds and request approval from a member of the management body.

12. Record Keeping

All complaints records (including accompanying documentation) will be retained for a period of at least five years, and in a format that is easily accessible to the Firm and Central Bank, even if a client should terminate their relationship within this period. A ‘complaints log’ is maintained by Compliance, and used as the basis for quarterly Board management reporting. The Complaints Log records:

- a) Complaints data (including the details of the complaint, the date of which the complaint was received, a summary of SDI's responses including dates, details of any other relevant correspondence, and the current status of the complaint); and
- b) Redress data (including details of the actions taken to resolve the complaint, the dates of which these actions were taken, and any other relevant details of the redress).

All notes and correspondence associated with a complaint are filed electronically in the client's casefile. The member of Compliance dealing with the complaint is responsible for ensuring its data is accurately recorded.

Management information should be provided by Compliance to the Risk Committee and/or Board of Directors outlining themes and trends in complaints data.

13. Litigation

If any complaint makes reference to potential litigation you must notify Legal without delay. There is the possibility that any communications, including correspondence, memoranda, notes, e-mails, telephone recordings (internal and external) may be required to be disclosed in any consequential litigation or regulatory proceedings, and SDI will be under a strict legal duty to preserve such materials.

All communications should follow the standards in the Communications Policy. Destroying such material is not only an offence under this Policy but will also constitute a breach of SDI's legal obligations that could result in adverse consequences for the Firm in any related litigation.

14. Quality Assurance

To ensure compliance with the requirements and standards set out in this Policy, quality assurance checks will be conducted by Compliance on selected complaints on a periodic basis. Several factors will be considered including the quality of the investigation and written response, with reference to the rules in MiCA and the expectations of the Central Bank, as compliance with the stated response timelines.

15. Root Cause Analysis and Management Reporting

In line with Art. 8 of the Commission Delegated Regulation, SDI will take reasonable steps to ensure that when handling complaints, it identifies and remedies any recurring or systemic errors or problems. SDI will analyse on a continuous basis complaints-handling data. Such data shall include all of the following:

- i. the average processing time, for the relevant period under consideration, for each step of the complaints handling procedure, including acknowledgement, investigation, response time;

- ii. the categories of the topics to which complaints relate;
- iii. the number of complaints received, for the relevant period under consideration, and for each step of the complaints handling procedure, the number of complaints where SDI did not comply with the maximum time limits set out in its complaints handling procedure;
- iv. the causes of individual complaints to identify root causes common to types of complaint;
- v. whether such root causes may also affect other processes or products, including those not directly the subject of a complaint;
- vi. the identity of all affected clients (including those who have not raised a complaint) or class of clients, where such root causes are confirmed to have affected other processes or products;
- vii. analysis as to the pattern of the errors that gave rise to complaints, including SDI's conclusion as to whether a particular error was an isolated incident;
- viii. remediation of such root causes where applicable and reasonable;
- ix. management information to identify relevant trends, including relevant products, services, teams, individuals etc.;
- x. escalation of the errors or problems to SDI's compliance function and senior management where appropriate; and
- xi. outcomes of investigations.

Annex 1. Complaint Templates

1. Template for the submission of complaints

FILING OF A COMPLAINT (to be sent by the client to SDI)

1.a. Information about the complainant

Last name/Legal entity name:

...

First name:

...

EUID or if not available national Registration or ID number:

...

Legal Entity Identifier (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 1.a)

Last name/Legal entity name:

...

First name:

...

Address (street, number, floor) (for legal entities, 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 as proof of the appointment of the representative to be provided as an attachment to this form)

Last name/Legal entity name:

...

First name:

...

Registration number and LEI (if available):

...

Address (street, number, floor) (For legal entities, registered office)

...

Postcode:

...

City:

...

Country:

...

Telephone:

...

Email address:

...

2.b. Contact details (if different from 2.a)

Last name/Legal entity name:

...

First name:

...

Address: street, number, floor (For firms registered office)

...

Postcode:

...

City:

...

Country:

...

Telephone:

...

Email:

...

3. Information about the complaint

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

...
...

3.b. Description of the complaint’s subject-matter

...
...
...

Please provide any documentation supporting the facts mentioned.

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

...
...

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

...
...
...

3.e. Other comments or relevant information (where relevant)

...
...

In _____ (place) on _____ (date)

SIGNATURE

COMPLAINANT/LEGAL REPRESENTATIVE OF THE COMPLAINANT

Documentation provided (please 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 investments to which the complaint relates	?
Other documents supporting the complaint:	?