

# Complaints Handling Policy

Fair, consistent and timely handling of user complaints

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| <b>Issuer</b>         | Trnznd SA, a sociedad anonima incorporated under the laws of the Republic of Panama |
| <b>Policy Name</b>    | Complaints Handling Policy                                                          |
| <b>Version</b>        | 1.0                                                                                 |
| <b>Effective Date</b> | 28 <sup>th</sup> June 2026                                                          |
| <b>Website</b>        | <a href="http://www.trnznd.io">www.trnznd.io</a>                                    |

## Policy Commitment

Complaints will be handled fairly, consistently, promptly, and objectively.

Complaint information will be treated confidentially and accessed only by authorised personnel.

Complaint outcomes will be used to improve service quality, operational resilience, and user experience.

## 1. Purpose

Trnznd SA ("Trnznd", "we", "us", or "our") is committed to maintaining high standards of professionalism, transparency, fairness, and accountability in its dealings with users of the Trnznd platform and holders of ZEND.

This Complaints Handling Policy establishes the procedures through which complaints are received, investigated, managed, and resolved. The policy is designed to ensure that complaints are handled fairly, consistently, promptly, and objectively.

Trnznd views complaints as an important source of user feedback and recognises that effective complaint resolution contributes to improved service quality, operational resilience, and user confidence.

## 2. Scope

This Policy applies to complaints relating to services provided directly by Trnznd.

- The Trnznd platform.
- ZEND issuance and redemption services.
- Customer onboarding procedures.
- KYC, AML, sanctions screening, and compliance processes.
- Transaction processing.
- Customer support interactions.
- Platform functionality.
- Data protection and privacy matters.
- Operational processes.
- Any other service provided directly by Trnznd.

This Policy does not apply to matters outside Trnznd's control, including disputes arising exclusively between third parties, secondary market trading venues, independent exchanges, self-custodied wallet providers, blockchain networks, or unrelated service providers.

### 3. Definition of a Complaint

For the purposes of this Policy, a complaint is any expression of dissatisfaction made by a user regarding a service, decision, action, omission, process, or conduct of Trnznd that the user believes has adversely affected them.

- A service provided by Trnznd.
- A decision made by Trnznd.
- The conduct of Trnznd personnel.
- The administration of a user account.
- The handling of a transaction.
- The application of Trnznd policies or procedures.

General enquiries, requests for information, routine support requests, or product feedback may not be treated as complaints unless the user specifically indicates dissatisfaction and seeks review or remediation.

### 4. Guiding Principles

Trnznd is committed to ensuring that complaints are handled in accordance with the following principles.

- **Accessibility:** the complaints process shall be simple, transparent, and easily accessible.
- **Fairness:** complaints shall be assessed objectively and independently, based on the facts and available evidence.
- **Confidentiality:** complaint information shall be treated confidentially and accessed only by authorised personnel with a legitimate need to know.
- **Timeliness:** complaints shall be acknowledged, investigated, and resolved as promptly as reasonably practicable.
- **Accountability:** appropriate records shall be maintained and corrective actions implemented where necessary.
- **Continuous improvement:** complaint outcomes shall be reviewed periodically in order to identify opportunities to improve services, controls, processes, and customer experience.

### 5. How to Submit a Complaint

Complaints may be submitted through the following official channel.

| Website                                                           |
|-------------------------------------------------------------------|
| <a href="https://www.trnznd.io/contact">www.trnznd.io/contact</a> |

When submitting a complaint, users should provide sufficient information to allow Trnznd to investigate the matter efficiently.

- Full name.
- Account or onboarding reference number, if applicable.
- Contact information.
- Detailed description of the complaint.
- Relevant dates and transaction references.
- Copies of any supporting documentation.
- The resolution or remedy being sought.

Failure to provide sufficient information may delay the investigation and resolution process.

### 6. Complaints Process

Trnznd follows a structured process for the receipt, acknowledgement, investigation, and resolution of complaints.

#### 6.1 Receipt

Upon receipt of a complaint, Trnznd will review the information provided and determine whether the matter qualifies as a complaint under this Policy. Each complaint will be assigned a unique internal reference number for tracking purposes.

## **6.2 Acknowledgement**

Trnznd shall issue a written acknowledgement of receipt within seven (7) business days of receiving the complaint. The acknowledgement will generally include confirmation of receipt, the complaint reference number, a summary of the complaint, the expected investigation process, and the estimated timeline for resolution.

## **6.3 Investigation**

Trnznd will conduct an investigation that is proportionate to the nature, complexity, and seriousness of the complaint. The investigation may include review of account information, transaction records, onboarding and compliance files, communications, relevant internal records, and third-party information where necessary.

## **6.4 Outcome**

Following completion of the investigation, Trnznd will provide a written response describing the findings of the investigation, relevant facts considered, any corrective action taken, any proposed resolution, and any reasons for rejecting the complaint where applicable.

## **7. Resolution Timeframes**

Trnznd shall use reasonable endeavours to provide a final written response within thirty (30) business days of receipt of the complaint.

Where a complaint is exceptionally complex and cannot reasonably be resolved within thirty business days, Trnznd will notify the complainant of the delay, explain the reason for the delay, and provide an updated anticipated timeframe.

- Regulatory investigations.
- Court proceedings.
- Fraud investigations.
- Cross-border matters.
- Third-party dependency investigations.
- Blockchain forensic reviews.
- Cybersecurity incidents.

## **8. Complaint Outcomes**

Depending on the circumstances, complaint outcomes may include one or more of the following.

- Clarification or explanation.
- Correction of records.
- Reversal or adjustment where appropriate.
- Apology.
- Operational remediation.
- Process improvement.
- Rejection of the complaint where no error is identified.
- Any other lawful resolution considered appropriate.

Nothing in this Policy obliges Trnznd to provide compensation or remedies where no error, omission, breach, or other actionable matter has occurred.

## **9. Complaints Involving Compliance Decisions**

Certain decisions may result from AML/CFT procedures, sanctions screening, fraud prevention controls, court orders, law enforcement requests, or regulatory obligations.

In such cases, Trnznd may be restricted by law from disclosing details of the underlying reasons for a decision. Users acknowledge that Trnznd may be required to comply with legal and regulatory obligations that limit the information that can be provided during a complaint investigation.

## 10. Complaints Relating to Third Parties

Trnznd is not responsible for the acts, omissions, decisions, insolvency, security failures, or operational practices of independent third parties.

- Exchanges.
- Wallet providers.
- Custodians.
- Banking institutions.
- Blockchain networks.
- Internet service providers.
- Other service providers not controlled by Trnznd.

Where feasible, Trnznd may assist users by providing information relevant to such issues, but complaints concerning third-party conduct may need to be directed to the relevant third party.

## 11. Escalation

If a complainant remains dissatisfied following receipt of Trnznd's final response, they may pursue any rights or remedies available under applicable law. Nothing in this Policy limits a complainant's ability to seek independent legal advice, refer matters to a competent court, refer matters to a competent governmental or regulatory authority, or pursue arbitration where applicable under the Terms and Conditions of Service.

## 12. Record Keeping

Trnznd shall maintain records relating to complaints, including complaint details, supporting documentation, investigation records, communications, decisions reached, and corrective actions taken.

Records shall be retained in accordance with Trnznd's document retention policies and applicable legal and regulatory requirements.

## 13. Confidentiality

Information relating to complaints shall only be disclosed to authorised Trnznd personnel, where necessary for investigation, to professional advisers, to service providers assisting with investigation, where required by law, pursuant to court order, or pursuant to regulatory or law enforcement requirements.

All complaint information shall be handled in accordance with Trnznd's Privacy Policy and applicable legal obligations.

## 14. Continuous Improvement

Trnznd periodically reviews complaint data, trends, root causes, and outcomes in order to improve customer experience, strengthen internal controls, enhance operational resilience, improve compliance procedures, reduce future incidents, and improve the effectiveness of products and services.

Complaint data may be used in anonymised and aggregated form for internal governance, quality assurance, risk management, and process improvement purposes.

## 15. Contact

Questions regarding this Complaints Handling Policy may be directed to Trnznd through the official contact channels set out below.

### Website

[www.trnznd.io/contact](https://www.trnznd.io/contact)

*By using the Trnznd platform, users acknowledge that complaints relating to Trnznd services will be handled in accordance with this Complaints Handling Policy.*