# FX RAILS AG

# COMPLAINTS HANDLING POLICY

### Complaints Submission Guidance

**Company:** FX Rails AG
**Swiss UID:** CHE-403.817.123
**Website:** https://fx-rails.com/
**Contact:** info@fx-rails.com

## 1. Introduction

The purpose of this document is to establish the procedure to be followed by clients, including natural persons (“Customers”) and, where applicable, legal entities (“Business Clients”), when submitting complaints concerning the services provided by FX Rails AG (“FX Rails” or the “Company”).

The Company is incorporated in Switzerland and provides digital payment-related services, including supported money transfers, subject to applicable regulatory requirements, service availability and arrangements with authorised payment service providers.

FX Rails is committed to handling complaints fairly, transparently, consistently and within reasonable timeframes.

This Complaints Handling Policy (“Policy”) describes how clients may submit complaints, how complaints are investigated, the applicable response procedures and the options available where a complaint remains unresolved.

## 2. Definitions of a Complaint and the Complainant

**Complaint:** A statement of dissatisfaction addressed to the Company by a Customer or Business Client concerning the provision, performance or administration of the Company's services, including payment transactions, account-related matters, fees, transaction delays or other service-related issues.

**Complainant:** A Customer or Business Client who has submitted a Complaint to the Company in accordance with the procedure established in this Policy.

**Customer Support:** The Company's designated support function responsible for receiving and addressing client enquiries, service-related issues and complaints.

**Business Day:** A day other than a Saturday, Sunday or public holiday in Zurich, Switzerland.

# 3. Complaints Handling

## 3.1. Submitting a Statement of Dissatisfaction

The Company provides Customer Support through the following communication channel:

**Email:** info@fx-rails.com

Clients experiencing difficulties with the Company's services are encouraged to contact Customer Support in the first instance, as many operational and transaction-related issues can be resolved without initiating a formal complaints procedure.

Such issues may include:

- Delayed or unsuccessful payment transactions.
- Questions regarding transaction status.
- Account access or verification difficulties.
- Payment card or recipient-related issues.
- Questions concerning fees or exchange rates.
- Technical difficulties affecting the use of the Company's services.

The Company aims to resolve routine service-related enquiries within fifteen (15) Business Days, where reasonably practicable.

Where an issue cannot be resolved through Customer Support, or where the client wishes to submit a formal Complaint directly, the procedure described below shall apply.

## 3.2. Submitting a Formal Complaint

A client who is dissatisfied with the Company's services or with the response received from Customer Support may submit a formal Complaint.

Complaints must be submitted in writing to:

**FX Rails AG**
**Email:** info@fx-rails.com
**Subject:** Formal Complaint – FX Rails

A Complaint may be submitted directly by email, together with relevant supporting documents.

Clients should provide sufficient information to enable the Company to identify the matter, assess the circumstances and conduct an appropriate investigation.

The submission of a formal Complaint is free of charge.

### 3.2.1. Complaint Information

To facilitate the investigation, a formal Complaint should include the following information, where relevant:

- Full legal name of the Complainant.
- Residential address or registered business address, where necessary.
- Email address associated with the FX Rails account.
- Telephone number associated with the account, if applicable.
- Transaction reference number or account identifier, if available.
- Customer Support ticket number, if previously assigned.
- Date of the incident or transaction concerned.
- Detailed description of the Complaint.
- Description of any previous communication with Customer Support.
- The outcome or resolution sought by the Complainant.
- Relevant supporting evidence, including transaction confirmations, screenshots or correspondence.

The Company may request additional identification information where necessary to verify the Complainant's identity or authority to act on behalf of a Business Client.

Clients should not submit complete payment card numbers, CVV/CVC codes, passwords, authentication codes or other sensitive security credentials by email.

Complaints should preferably be submitted in English to facilitate efficient handling. Complaints received in another language will be assessed, and the Company may request clarification or a translation where reasonably necessary.

The information provided must be accurate, complete and up to date.

Where additional information or clarification is required, the Company may contact the Complainant before proceeding with the investigation.

The absence of non-essential information or supporting documents will not automatically result in rejection of a Complaint.

### 3.2.2. Company's Rights

The Company reserves the right to request additional information, clarification or supporting evidence where reasonably necessary to investigate a Complaint.

The Company may decline to investigate a Complaint where:

- The matter does not relate to services provided by FX Rails or to activities for which the Company has legal or contractual responsibility.
- The Complaint is demonstrably fraudulent or deliberately misleading.
- The Complaint is substantially identical to a matter already investigated and resolved, and no material new information has been provided.

- The Company is legally prohibited from investigating or disclosing information concerning the matter.
- The Complainant fails to provide information essential to the investigation after reasonable requests and opportunities to respond.

Where a Complaint concerns services performed by an authorised third-party payment provider, the Company may coordinate with the relevant provider or refer the matter to the provider responsible for the disputed service.

Any decision to decline or close a Complaint shall be subject to applicable law and shall not restrict the Complainant's mandatory legal rights.

The Company reserves the right to take appropriate legal action in cases involving deliberate fraud or other unlawful conduct.

# 3.3. Action When a Complaint Is Received

## 3.3.1. Acknowledgement of Complaint

Upon receiving a formal Complaint, the Company will send a written acknowledgement to the Complainant within five (5) Business Days.

The acknowledgement will normally be sent to the email address provided by the Complainant.

The acknowledgement may include:

- Confirmation that the Complaint has been received.
- The date of receipt.
- A complaint reference number, where assigned.
- Information regarding the next steps in the investigation.
- A request for additional information, where necessary.

Complaints relating to alleged failures in the performance of the Company's services, payment transactions or potential infringements of contractual or legal rights will be reviewed in accordance with this Policy, the Company's internal procedures and applicable legislation.

Where the Complaint concerns an activity performed exclusively by another entity for which FX Rails has no legal or contractual responsibility, the Company will explain this position and, where reasonably possible, provide information about the appropriate service provider.

## 3.3.2. Investigation

The Company will investigate Complaints objectively, fairly and in good faith.

The investigation may involve Customer Support, Compliance, Operations, Risk Management, relevant technical departments and, where necessary, external payment service providers or legal advisers.

During the investigation, the Company may:

- Review relevant transaction records and account information.
- Examine previous correspondence with the Complainant.
- Request additional documentation or clarification.
- Consult the relevant payment processing or banking partners.
- Assess the applicable contractual terms and legal requirements.
- Determine whether corrective or remedial measures are appropriate.

The Company will keep the Complainant reasonably informed of material developments in the handling of the Complaint.

The Complainant is expected to cooperate with reasonable requests for information necessary to investigate the matter.

FX Rails will seek to resolve Complaints in accordance with principles of fairness, proportionality, good faith and applicable legal and regulatory obligations.

## 3.4. Responses to Complaints

The Company will investigate Complaints carefully and seek to provide a clear written response as promptly as reasonably possible.

The Company aims to provide a substantive response within fifteen (15) Business Days from the date of receipt of the formal Complaint.

Where a Complaint is complex, requires additional information or involves external payment service providers, the Company may require additional time to complete its investigation.

If the Company is unable to provide a final response within fifteen (15) Business Days, it will send an interim written response explaining:

- The reasons for the delay.
- The current status of the investigation.
- Any outstanding information or actions required.
- The expected date of the final response.

The Company aims to provide its final response no later than sixty (60) calendar days from the initial receipt of the Complaint, unless a shorter mandatory deadline applies or applicable law permits or requires a different timeframe.

Where a Complainant does not respond to reasonable requests for essential information within sixty (60) calendar days from the submission of the Complaint, the Company may close the investigation, provided that doing so does not conflict with applicable legal obligations.

Complaints involving significant compliance, legal, financial or reputational risks may be referred to the Company's Compliance function, Senior Management or external legal advisers for review.

Once the investigation is completed, the Company will provide the Complainant with a written response setting out:

- The outcome of the investigation.
- An explanation of the Company's position.
- Any corrective or remedial measures proposed, where applicable.
- Information about available further steps if the Complainant remains dissatisfied.

Where the Complaint concerns an unauthorised or incorrectly executed payment transaction, the Company's response and any reimbursement obligations shall remain subject to applicable mandatory law and the responsibilities of the relevant regulated payment service provider.

# 4. Escalation and External Dispute Resolution

If a Complainant is dissatisfied with the Company's final response, or considers that the Complaint has not been adequately resolved, the Complainant may request a further review by the Company.

The request should be submitted to:

**Email:** info@fx-rails.com
**Subject:** Complaint Escalation – FX Rails

The Company will review the request and determine whether additional investigation or reconsideration is appropriate.

Where a dispute concerns a regulated payment service performed by an external payment service provider, the Complainant may also have the right to submit the matter to the relevant provider or to a competent external dispute resolution body, subject to applicable law and the provider's regulatory framework.

Where an independent ombudsman, mediation service or alternative dispute resolution body has jurisdiction over the relevant dispute, the Complainant may seek assistance from that body in accordance with its applicable eligibility and procedural requirements.

The availability of any particular external dispute resolution mechanism depends on the nature of the service, the responsible provider, applicable legislation and the jurisdiction concerned.

Nothing in this Policy limits or excludes the Complainant's mandatory right to seek legal remedies before a competent court or to contact a competent regulatory or supervisory authority where applicable.

# 5. Confidentiality and Data Protection

The Company will handle Complaints and related information confidentially, subject to applicable legal and regulatory requirements.

Personal data collected during the complaints process will be processed for purposes including:

- Identifying and communicating with the Complainant.
- Investigating and resolving the Complaint.
- Verifying relevant transactions and account information.
- Preventing fraud and ensuring compliance with legal obligations.
- Maintaining appropriate records of complaints and their outcomes.

Information may be shared with authorised employees, professional advisers, payment service providers or competent authorities where necessary and legally permitted.

Personal data will be processed in accordance with applicable data protection legislation and the Company's Privacy Policy.

# 6. Record Keeping

FX Rails will maintain appropriate records of formal Complaints received, their investigation and their resolution.

Such records may include:

- The date the Complaint was received.
- The identity or reference details of the Complainant.
- The nature and subject of the Complaint.
- Relevant supporting documentation.
- Internal investigation steps.
- Communications with the Complainant.
- The final outcome and any remedial action taken.

Complaint records will be retained for periods required by applicable law and the Company's lawful retention policies.

# 7. Review and Amendments

The Company may review and amend this Policy from time to time to reflect changes in its services, internal procedures, applicable legislation or regulatory requirements.

The latest version of this Policy will be made available on the Company's website:

https://fx-rails.com/

Material amendments will be communicated where required by applicable law.

# 8. Company Information

**Legal Name:** FX Rails AG
**Swiss UID:** CHE-403.817.123
**Country of Incorporation:** Switzerland
**Website:** https://fx-rails.com/
**Customer Support and Complaints:** info@fx-rails.com