

Based on Article 71 of 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 (Official Journal of the EU, L150, 9 June 2023, pp. 40–205; hereinafter: **the MiCA Regulation**), the management of INCREMENTUM d.o.o. (hereinafter: **the Company**) adopts the following internal act:

RULEBOOK ON CLIENT COMPLAINT HANDLING AND OUT-OF-COURT DISPUTE RESOLUTION

1. INTRODUCTORY AND GENERAL PROVISIONS

1.1. Subject matter

The Rulebook on Client Complaint Handling and Out-of-Court Dispute Resolution (hereinafter: the Rulebook) lays down the procedure for resolving disputes between the Company and its clients.

The dispute resolution procedure includes:

- i. an internal complaints procedure; and
- ii. out-of-court dispute resolution.

All disputes between clients and the Company shall first be addressed through the internal complaints procedure.

A client who is not satisfied with the Company's decision issued in the internal complaints procedure, or whose complaint has not been decided within the deadlines set out in this Rulebook, may initiate out-of-court dispute resolution.

2. INTERNAL COMPLAINTS PROCEDURE

2.1. Fundamental principles

In handling client complaints, the Company follows these principles:

- i. equal treatment of clients;
- ii. prevention of conflicts of interest;
- iii. fairness and good faith;
- iv. legality and professionalism;
- v. confidentiality and personal data protection;
- vi. efficiency and promptness.

2.2. Content of a complaint

A complaint is any expression of dissatisfaction addressed to the Company concerning the provision of crypto-asset services, regardless of its form or wording.

A statement is treated as a complaint if it clearly indicates which client it relates to and the substance of the dissatisfaction.

2.3. Submission of complaints

A client may submit a complaint in Slovenian or English, free of charge:

- a) in writing by post to the Company's address (Špruha 19, 1236 Trzin, Slovenia); or

b) by email to **info@incrementum.si**.

The client may use the form in Annex 1 to this Rulebook.

A written complaint is deemed received on the day it arrives at the Company's registered office.

An email complaint is deemed received the same day if it arrives by 16:00. Complaints received after 16:00 are deemed received on the next business day.

2.4. Handling of complaints

Complaint handling falls under the responsibility of the Compliance and Risk Management Function, which:

- i. determines whether a submission qualifies as a complaint;
- ii. gathers information and documentation;
- iii. maintains a complaint register;
- iv. forwards complaints to management;
- v. monitors response deadlines;
- vi. ensures fair and efficient handling;
- vii. alerts management to irregularities;
- viii. prepares reports for management and the Securities Market Agency (if required);
- ix. proposes improvements and corrective measures.

Upon receipt of a complaint, the Compliance and Risk Management Function shall first assess whether the submission qualifies as a complaint within the meaning of this Rulebook. If it does not, the complaint procedure shall be discontinued, the submission dismissed, and the client informed accordingly.

If a complaint is incomplete, the Company shall, within 15 days of receipt, invite the client to supplement it. If the Company does not request supplementation within 15 days, the complaint shall be deemed complete and taken into consideration. Where the Company requests supplementation and warns the client that failure to submit a complete complaint within 15 days will result in dismissal, the complaint shall be dismissed and not considered if the client fails to comply.

If the Compliance and Risk Management Function determines that a complaint has been submitted in a timely manner and qualifies as a complaint under this Rulebook, it shall initiate a fact-finding procedure to assess the merits of the complaint. All employees and external contractors are required to provide evidence and clarify circumstances relating to the complaint.

The Compliance and Risk Management Function shall inform the Company's management of every timely and complete complaint, and the management shall decide on the complaint.

If a complaint is not dismissed as incomplete or late, the Company may in the internal complaints procedure:

- x. fully uphold the complaint;
- xi. partially uphold and partially reject it; or
- xii. fully reject it.

The Company shall send the client a written decision on the complaint within 60 days of receiving a complete complaint, either by registered mail to the client's address or by email to the address provided during the establishment of the business relationship.

After the conclusion of the complaints procedure, the Compliance and Risk Management Function shall record the decision in the complaints register.

2.5. Documentation and record-keeping

At the client's request, the client shall be allowed to inspect, in person at the Company's registered office, the documentation and information relating to their complaint. Upon request, the client shall be provided with photocopies of the reviewed documentation and information.

The Company maintains records of received client complaints and of the measures taken to resolve them. The method of keeping and the content of the complaints records are governed by the Rules on Record-Keeping and the Client Complaints Register.

At the request of the Securities Market Agency, the Company shall ensure the availability of information relating to the handling of client complaints to the public and to the Securities Market Agency.

The Company regularly analyses complaint-handling data to ensure that recurring or systemic issues and potential legal and operational risks are identified and addressed. The Compliance and Risk Management Function shall submit to the Company's management, once per year and no later than 31 March, a report on client complaints from the previous year, including an analysis of disputed relationships, their patterns, and the causes of their occurrence.

The analysis referred to in the preceding paragraph shall include, at a minimum, an analysis of:

- i. average handling time per stage;
- ii. number of complaints and delays;
- iii. complaint categories;
- iv. investigation outcomes.

3. OUT-OF-COURT DISPUTE RESOLUTION

3.1. For consumers

Any disagreement, dispute, or claim between a non-professional client who is a consumer and the Company that cannot be resolved within the internal complaints procedure may, at the initiative of such client, be settled through an out-of-court dispute resolution procedure before the European Centre for Dispute Resolution, Tomšičeva ulica 6, 1000 Ljubljana, Slovenia (telephone: +386 8 20 56 590, email: info@ecdr.si), in accordance with the provider's dispute resolution rules and the provisions of the Consumer Out-of-Court Dispute Resolution Act.

3.2. For other persons

Disputes with non-professional clients who are not consumers and which cannot be resolved within the internal complaints procedure shall be settled by arbitration in accordance with the Arbitration Rules of the Permanent Arbitration at the Chamber of Commerce and Industry of Slovenia. The arbitral tribunal shall consist of three arbitrators, with the client and the Company each appointing one arbitrator, and the two appointed arbitrators selecting the third arbitrator. The seat of arbitration shall be Ljubljana, Slovenia.

4. FINAL PROVISIONS

4.1. Final provisions

This Rulebook enters into force on the date the Company obtains authorisation to provide crypto-asset services.

Trzin, 3 November 2025

INCREMENTUM d.o.o.

Tilen Repar, direktor



Uroš Marčič, direktor



Annex 1: Complaint Form

[separate document]