

Complaints Handling Policy and Procedure

Client complaints refer to any expression of dissatisfaction, from or on behalf of any customer about HashKey Group (the “Company”)’s provision of, or failure to provide a service/ product. Customers may file a complaint if they are not satisfied with the services/ products provided or failed to be provided by the Company. The following details the management of customer complaint lodged with the Company.

Once the Company has received customer complaint, the Company will try to resolve it immediately, but the Company may need to carry out an internal investigation.

1.1 What are the purposes of this complaints handling procedure?

The purposes of this complaints handling procedure are to:

- 1.1.1 promote customer satisfaction by encouraging feedback from customers, including complaints,
- 1.1.2 provide a timely and effective mechanism for lodging and responding to complaints,
- 1.1.3 define the complaints to be handled,
- 1.1.4 ensure complaints are handled impartially, fairly, justly, effectively, efficiently, and confidentially,
- 1.1.5 define the responsibilities and rights of complainants and the individuals subject to complaints,
- 1.1.6 outline the complaints handling process.

1.2 What is a complaint?

A complaint is an expression of dissatisfaction by a customer relating to the services/ products provided or failure to provide by the Company.

1.3 Who can complain?

Any person who is directly affected by our services can lodge a complaint. Generally, a person is "directly affected" when such person is affected as a direct result of the actions or inactions of the Company or its staff members.

1.4 How a complaint can be made?

Customers could file customer complaint to the Company by email (compliance.complaints@hashkey.com), setting out the complaint in full details including but not limited to circumstances of the alleged incident.

The Company value all complaints and treat all complaints, including anonymous complaint, seriously and will take action to consider them further, wherever this is appropriate.

Generally, the Company will consider anonymous complaints if there is in our discretion reasonably sufficient information in the complaint to enable us to make further enquiries. If, however, the Company, an anonymous complaint does not provide enough information to enable us to take further action, the Company may decide not to pursue it further.

Complaints that are raised anonymously will be considered at the discretion of MIC of compliance designated by our senior management who will take into account the seriousness of the complaint, the credibility of the complainant and the likelihood of confirming the complaint from sources that can be verified. For the purposes of this procedure, a complaint that is made by an anonymous or unidentifiable person or by a person who cannot be contacted will be handled as if it is an anonymous complaint.

1.5 What do customer need to provide when a complaint is lodged?

When customer lodge a complaint, the Company needs customer to provide necessary information for us to verify customer's membership, so as to ensure the security of customer's account and the system.

To help us resolve customer's complaint as swiftly as possible, please provide us with the following information:

- Customer's full name, address and other relevant personal details such as account number or account details to the extent that is necessary;
- A clear and honest outline of customer's complaint;
- Copies of any supporting documents concerning customer's complaint, paying special attention to the dates of occurrence;
- Details of what customer would like the Company to do to rectify the situation

In order to facilitate our contact with customer, help customer solve the complaint as soon as possible or record the solutions and results of the complaint, the Company may keep customer's communication records and related information (including customer's account information, order information, other information customer provide to prove the relevant facts, or contact information customer provide). If customer makes queries, lodges complaints or provides suggestions in connection with any specific order, the Company

will make relevant inquiries through customer's account information and order information.

As may be reasonably necessary for the Company to provide services and improve our standard of service, the Company may also use information of customers, including but not limited to the relevant information customer provide when customer contact our customer service department, and the replies customer provide in our questionnaire surveys.

The Company would keep proper records of all complaints. Details of follow-up actions should be kept for complaints related to client assets. The Company would establish and maintain effective record retention policies to ensure that records of complaints are available for the SFC to carry out routine and ad-hoc reviews or investigations. Any personal information collected shall be subject to HashKey Group's applicable Privacy Policy Statement on the Company website.

1.6 What is the time limit for customer making a complaint?

It may be difficult to investigate into customer's complaint properly if significant time has passed since the incident leading to customer's complaint arose. The Company will investigate complaints which are lodged within one (1) year of the date on which customer become aware of the circumstances of the complaint. Complaints made more than one (1) year will only be investigated if customer can show a reasonable ground for the delay.

1.7 How will a complaint be dealt with?

After receiving a complaint, the Company will deal with the matter as soon as practicable and keep customer informed of the progress of our investigation. A complaint will be dealt by a qualified staff designated by senior management other than an individual directly concerned with the subject of the complaint or the compliance officer.

Within one (1) week of receiving customer complaint, the Company will write to customer to acknowledge receipt of customer's complaint. Where possible customer may be required to provide additional information for us to consider customer's complaint. Where the criteria for a complaint are not satisfied, no investigation will be carried out and customer will be informed accordingly.

For minor cases involving professional standards, competence, behavior of our staff members or any issues noted in operation support, our aim is to provide complainant with a written reply within four (4) weeks from the date the complaint is received.

For other complaints, our aim is to provide complainant with a written reply within 2 months from the date the complaint is received.

The aforesaid timeline is an indicative only and not a commitment, as the processing of a complaint may be subject to various factors, such as the complexity of the complaint and any subsequent communications with the complainant for the purpose of seeking further information or clarification. In any event, the Company will take steps to ensure that the process is completed within a reasonable time. When an investigation is taking longer than reasonably expected to complete, the Company will provide complainant with an interim report.

1.8 Why must customer have a genuine complaint and include as much information as possible?

The Company may not investigate a complaint under the following circumstances (including but not limited to):-

- (a) where incomplete or inaccurate contact information or personal data has been provided;
- (b) where a complaint is malicious or frivolous in nature, or appears to have been made in order to be vexatious;
- (c) where a complaint does not set out adequate and clear information to enable it to be assessed;
- (d) where there has been undue delay on the part of the complainant in providing any information reasonably requested by the Company;
- (e) where a complaint involves an on-going litigation proceeding which directly relates to the complaint, the Company will hold the matter in abeyance until the conclusion of the proceeding;
- (f) where the subject matter of customer's complaint is currently being investigated by a relevant government authority or regulatory body, the Company will hold the matter in abeyance pending conclusion of their investigation.

In such cases, the Company will inform customer of the decision in writing with reason why the complaint is not being dealt with under this procedure.

1.9 What happens after the investigation?

Upon conclusion of the assessment or investigation, the Company will undertake prompt actions to remedy any issues identified from the investigation, and a final written reply will be issued to customer stating our decision/action with details. Such a decision will be regarded as final in the absence of new material information or evidence.

The Company's staff would escalate internally to senior management any serious and high-impact cases for prompt handling and investigation, and report to the SFC without delay suspected breaches of the Code of Conduct and other regulatory requirements.

Example of complaints which are generally regarded as serious and high-impact and should be reported promptly to the SFC include:

- a) complaints involving fraud, such as misappropriation of client assets;
- b) complaints indicating staff misconduct, such as unauthorised trading and mis-selling of investment products;
- c) complaints against prolonged malfunctions of the firm's trading system;
- d) mass complaints in which multiple clients complain about the same or a similar issue;
- e) complaints involving significant financial losses by clients or indicating that clients' interests are seriously jeopardised; and
- f) complaints which may cause significant financial, operational and reputational risks to the firm.

Once the Company has sent our final response to customer, the Company will treat the matter as closed if customer do not respond within four (4) weeks.

1.10 What happens if customers are not satisfied with the outcome of the investigation?

If the Company has not responded to customers within a reasonable time or if customers are not satisfied with the decision, customers may request the Company to review the decision by providing new material information or evidence or refer the matter to other relevant regulators or relevant authorities.

HashKey Group is subject to the jurisdiction of The Hong Kong Financial Dispute Resolution Centre ("FDRC") in Hong Kong. As such, the Company must comply with the Financial Dispute Resolution Scheme ("FDRS") procedures and rules for managing and resolving disputes administered by the FDRC. If the Company are not able to resolve customer's complaint together with customer through our internal resolution process, customer may refer customer's complaint to the FDRC if: (a) customer are an individual or a sole proprietor; and (b) the amount of each individual monetary claim is not more than HK\$500,000 (or its equivalent in another currency). The dispute resolution process of the FDR is available at <https://www.fdrc.org.hk/>

1.11 Language

The Document is written in an English version and a Chinese version. Both versions are equally authentic and have equal weight. In the event of any conflict between the two versions, the English version shall take precedence.

1.12 Review

The document will be reviewed every 3 years and updated whenever there is a material change in the firm's business model or organisational structure.

The latest Update: May 2022