

ATLAS AI LABS FZE

Complaints Handling Policy

TO VIRTUAL ASSETS REGULATORY AUTHORITY

Versions tracking

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1. Introduction to the Policy

1.1 Purpose and Objective

The Complaints Handling Policy at ATLAS AI LABS FZE serves as an essential component of the company's commitment to client protection, regulatory compliance, and continuous improvement. The objective of this policy is to ensure that all clients and stakeholders have clear and accessible channels through which concerns can be raised regarding service quality, operational matters, virtual asset issuance processes, or any aspect of their interaction with Atlas.

Atlas provides multiple avenues for submitting complaints, including designated email addresses, online submission forms, and direct communication with authorized personnel. These channels ensure that clients can easily raise concerns and receive timely responses.

The policy sets out a systematic process for handling complaints: from initial receipt and acknowledgment, to thorough investigation, resolution, and follow-up. Atlas prioritizes transparency and fairness throughout this process, keeping clients informed of progress and expected timelines.

Beyond resolving individual issues, Atlas is committed to learning from complaint data. Trends and recurring issues are analyzed to identify root causes and implement corrective actions to enhance service delivery, system robustness, and internal procedures.

Ultimately, the Complaints Handling Policy at ATLAS AI LABS FZE fosters a culture of accountability, responsiveness, and continuous improvement. By treating client feedback as a critical asset, the company aims to build lasting relationships founded on trust, reliability, and strong consumer protection standards.

All complaints shall be handled fairly, impartially, and consistently, without discrimination or retaliation. Atlas AI Labs FZE ensures that no client or individual is disadvantaged for submitting a complaint in good faith.

Atlas ensures that complaint submission channels are easily accessible, clear, and available to all clients, and that no unreasonable barriers exist to prevent or discourage the submission of complaints.

1.2 Scope and Applicability

This policy applies across ATLAS AI LABS FZE and is aligned with relevant local and regulatory requirements, including those issued by VARA. All Atlas employees, contractors, consultants, and associated personnel regardless of function or seniority are required to comply with this policy.

In the event of any conflict between this policy and local laws/regulations, the more stringent standard shall apply. Any amendments required to ensure compliance with applicable laws must be approved by the **Chief Compliance Officer (CCO)**.

The Compliance Officer is responsible for maintaining this policy, conducting periodic reviews, and updating it annually or whenever operational, regulatory, or business changes necessitate revisions. Material amendments require approval from the CCO.

1.3 Requirements

All employees of ATLAS AI LABS FZE must adhere to the standards, obligations, and procedures outlined in this policy without exception. This requires:

- Understanding the content and purpose of the policy
- Applying the prescribed procedures in all relevant interactions
- Upholding regulatory and internal compliance requirements
- Handling client communications professionally and transparently
- Protecting sensitive information and maintaining confidentiality

Employees must promptly report any potential breaches of this policy and fully cooperate with investigations. Compliance with this policy is essential to maintaining Atlas's values, reputation, and regulatory obligations.

1.4 Compliance

Every employee within ATLAS AI LABS FZE plays a vital role in maintaining a culture of compliance. This includes following internal policies, industry standards, and all legal and regulatory obligations under VARA and UAE law.

Employees must:

- Stay informed about regulatory updates relevant to their roles
- Ensure their conduct meets ethical and legal expectations
- Accurately document, record, and escalate issues when required

By fostering a culture centered on compliance, Atlas reinforces its commitment to integrity, transparency, and accountability across all business functions.

1.5 Reporting

Reporting is a critical element of Atlas's compliance culture. Employees are expected to report any violations, concerns, or suspicious activities, including but not limited to:

- Misconduct
- Conflicts of interest
- Fraud or suspicious transactions
- Breaches of policies or laws

Reports may be made through supervisors, HR, Compliance, or through anonymous reporting channels if implemented.

Any regulatory breaches must be escalated **directly to the Chief Compliance Officer (CCO)**, ensuring timely and appropriate action.

Atlas values and supports individuals who report in good faith and is committed to fostering an environment where transparency and accountability are encouraged.

2. Substance of a Complaint

2.1 Definition of a Complaint

A complaint is defined as:

Any oral or written expression of dissatisfaction, justified or not, submitted by a client, prospective client, or former client concerning the delivery or non-delivery of services.

Complaints may pertain to:

- Service quality
- Delays or operational errors
- Decisions or actions of Atlas staff
- Communication issues
- Virtual asset issuance processes
- Perceived lack of information

Atlas must address all complaints, regardless of tone or perceived validity. However, resolution does not guarantee a decision in favor of the complainant.

ATLAS AI LABS FZE **will not impose fees or charges** for filing or processing complaints.

2.2 Complaint Channels

Complaints may be received via the following methods:

Complaint Channel	Description
Hard Copy Letter	Clients may submit written complaints to the registered office of ATLAS AI LABS FZE.
Email	Clients may submit complaints through: complaints@atlasailabs.ae , which will be forwarded to Compliance for review.
Third Parties	Complaints submitted through legal representatives, regulatory authorities, or external bodies will be directed immediately to the CCO.

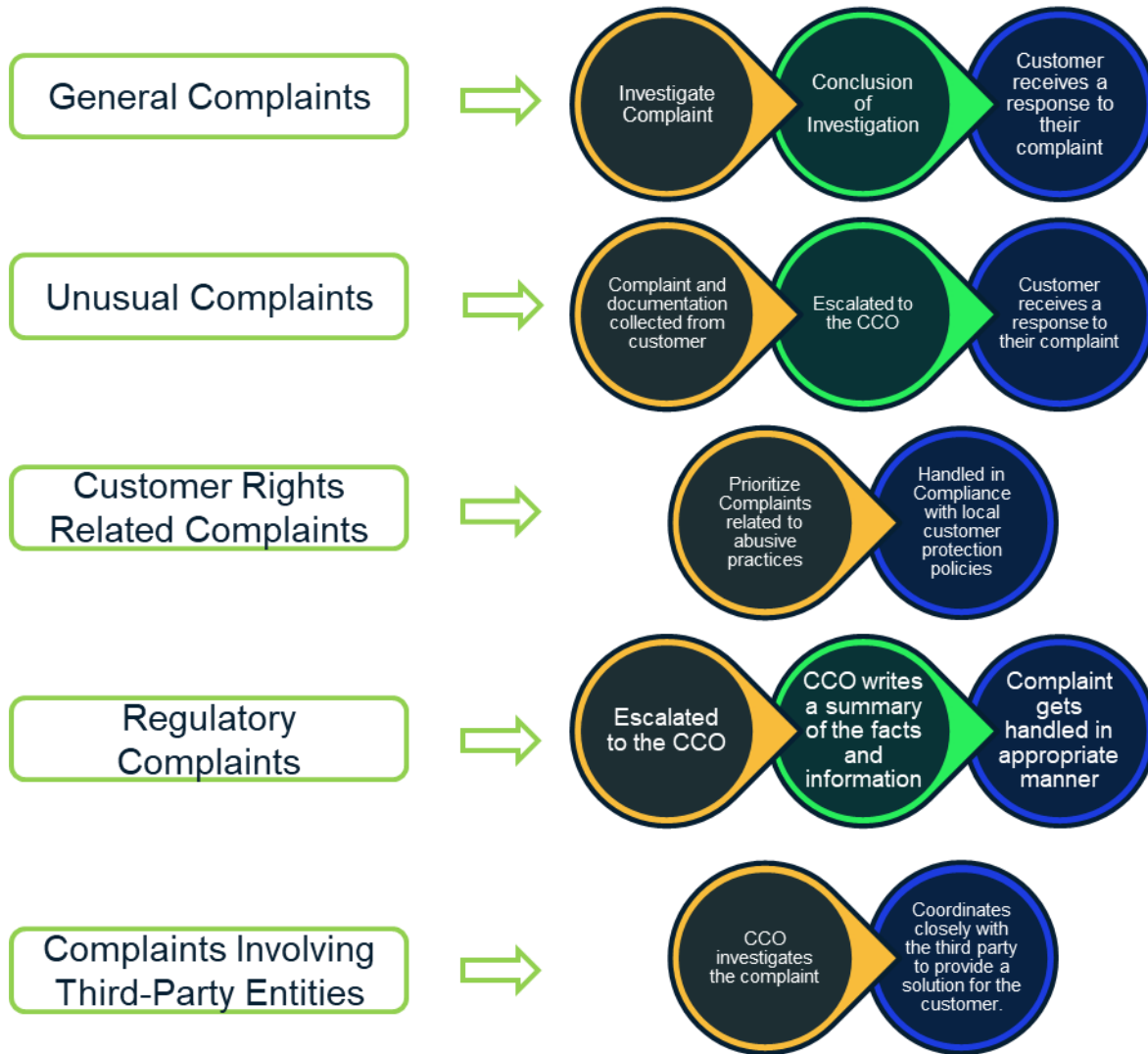
Complaint Channel	Description
Social Media	If the complainant is a known client, the representative will direct them to submit the complaint through email for proper handling.

For the purpose of regulatory timelines, a **complaint is considered to have been made** at the earlier of:

- the time it is **received by Atlas** via any of the channels listed above; or
- the time it is first logged by an Atlas representative as a client complaint.

2.3 Categories of Complaints

Categorizing complaints enables Atlas to analyze trends and enhance service quality. Complaints may include (but are not limited to):



These categories help prioritize responses and identify operational enhancements.

2.4 Complaint Risk Ratings

All complaints undergo a risk assessment based on severity and potential impact:

- **Low Risk (1):** Minor issues with limited impact and no regulatory implications.
- **Moderate Risk (2):** Potential regulatory relevance, recurring issues, or limited financial impact.
- **High Risk (3):** Significant financial, regulatory, operational, or reputational implications; may require escalation to VARA.

The CCO determines the appropriate risk rating.

2.5 Response Times

Unless otherwise prescribed by law, Atlas will follow the below standards:

- Written complaints will be **acknowledged within seven (7) days**, including requests for additional documentation.
- Investigations will be **completed and a final response issued within four (4) weeks**, unless exceptional circumstances apply.
- If additional time is required:
 - The client will be notified within the initial 4-week period
 - Monthly updates will be provided
 - A reasonable expected resolution date will be communicated

If the CCO cannot resolve a high-risk complaint within the mandated period, it must be escalated to Senior Management.

The complaint will in all cases be fully resolved **no later than eight (8) weeks** from the date the complaint was first made

2.6 Response Methods

Complaints will be responded to using the same method by which they were received unless the complainant requests otherwise.

If a complaint is resolved to the complainant's full satisfaction and no written response is requested, Atlas is not obligated to send a formal final response (except where regulatory obligations require otherwise).

2.7 Complaints Oversight

Atlas will maintain a comprehensive log of all complaints, including:

- Category
- Nature of issue
- Communication channel
- Risk rating
- Date received
- Date resolved
- Actions taken
- Jurisdiction (if applicable)

The CCO will:

- Conduct regular analysis of complaints

- Analyse the root causes of complaints, especially recurring or high-risk themes
- Assess whether such root causes may affect other clients that have not been directly complained of
- Provide quarterly reports to senior management
- Present complaint trends to the Board of Directors **at least quarterly**
- Ensure that appropriate corrective and preventative actions are implemented and tracked to completion

3. Regulatory Requirements

ATLAS AI LABS FZE is committed to full compliance with applicable laws and regulations governing complaints handling, including:

- **Virtual Assets Regulatory Authority (VARA) rulebooks**
- **UAE Consumer Protection Law (Federal Law No. 15 of 2020)**
- **UAE Data Protection Law (Federal Decree-Law No. 45 of 2021)**
- Any additional regulatory requirements applicable to VA Issuance activities

The company is dedicated to ensuring that complaint handling is consistent with legal obligations, fairness, and client protection standards.

4. Record Keeping

Atlas maintains strict record-keeping practices for all complaints. Records will be kept for **a minimum of eight (8) years** following resolution, or longer if required by law or internal policy.

Maintaining accurate records supports audit readiness, regulatory compliance, and internal quality assurance.

APPENDIX 1 – Complaints Form

All complaints must be forwarded to the Compliance Officer for action.

Please collect and record the following information to enable efficient processing:

- **Date complaint was received:** _____
- **Name of client:** _____
- **Client contact details:**
 - Phone: _____
 - Mobile: _____
 - Email: _____
 - Address: _____

Summary of complaint (include relevant dates, events, and individuals involved):

- Is the complaint material in nature? **Yes / No**
- Is the complaint from a current or past client? **Yes / No**

Nature of loss/damages claimed (if any):

- Has the complaint been notified to the Compliance Officer? **Yes / No**
- Has the complaint been resolved? (Provide details) **Yes / No**
- Are procedural changes necessary to avoid recurrence? **Yes / No**
- If yes, have changes been implemented? (Provide details) **Yes / No**

Please attach any supporting documentation that may assist in the investigation and resolution of the complaint.

I confirm this complaint has been handled in accordance with company procedures.

Signed