



Global payment infrastructure.

PUBLIC COMPLAINTS HANDLING POLICY

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1. Presentation of Nilos France SAS

Nilos France SAS is a simplified joint-stock company (société par actions simplifiée) with share capital of €790,000, with its registered office located at 57 Avenue Charles de Gaulle, 92200 Neuilly-sur-Seine, registered with the Nanterre Trade and Companies Register under number 918 733 502.

Nilos France SAS is authorised by the Autorité des marchés financiers (AMF) as a Crypto-Asset Service Provider (CASP) under number XXXX, in accordance with Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on markets in crypto-assets (“MiCAR”).

In this capacity, Nilos France SAS provides the following services:

Custody and administration of crypto-assets on behalf of clients;

Exchange of crypto-assets for funds;

Exchange of crypto-assets for other crypto-assets;

Transfer of crypto-assets on behalf of clients.

2. Purpose of this policy

In accordance with Article 71 of the MiCAR Regulation, Article 11 of Delegated Regulation (EU) 2025/305 and Delegated Regulation (EU) 2025/294, Nilos France SAS undertakes to handle any complaint submitted by its clients with diligence, impartiality and within the timeframes set by the regulation.

The purpose of this public complaints handling policy is to inform Nilos France SAS clients of:

the definition of a complaint and the situations it covers;

the channels available to submit a complaint;

the applicable processing timeframes;

the means of recourse available in case of dissatisfaction.

The handling of any complaint is entirely free of charge, in accordance with Article 71(2) of the MiCAR Regulation.

3. What is a complaint?

A complaint is any statement by which a client expresses dissatisfaction regarding the services provided by Nilos France SAS. It is distinct from a simple request for information or assistance, which is processed as a standard request.

Complaints may relate, in particular, to the following matters:

The Company’s behaviour towards clients;

Information or advice provided;

Quality of services offered;

Pricing;
Failure or improper execution of a transaction;
Processing time of a transaction;
Platform malfunctions;
Dispute over a transaction (loss, fraud or theft);
Account incidents or account closure;
Transfer or mobility.

4. How to submit a complaint?

Clients may submit their complaint to Nilos France SAS through one of the following two channels, made available free of charge:

By dedicated email: complaints@nilos.io

Via the online assistance request form, available on the Company's website: <https://nilos.io>, and as an annex to this Policy.

Formal complaints must be submitted exclusively through one of these two channels in order to ensure their traceability and registration.

Nilos France SAS accepts complaints in French or English and replies in the language used by the client.

To facilitate the processing of your complaint, we kindly invite you to specify in particular:

Your last name, first name and contact details;

The service or transaction concerned;

A clear and detailed description of the subject of your complaint;

Any relevant document or supporting evidence, where applicable.

Complaints must include sufficient information and supporting documents to enable a proper investigation and resolution. The Company may request additional details before processing incomplete complaints, thereby suspending the review period until the required information is provided.

Complaints must be filed in good faith and must not contain false, misleading or fraudulent information. The Company will reject frivolous, abusive or maliciously intended complaints.

The Company will not handle complaints that have already been resolved or that are currently being investigated by another legal or regulatory body.

This exclusion applies in the following circumstances:

- Complaints already resolved: the client has accepted the Company’s final written response without reserving further rights and has raised the same issue again without presenting new facts.
- External dispute resolution: the complaint has already been submitted to an external dispute resolution scheme or has already been the subject of a final decision by such a scheme.
- Judicial proceedings: the dispute is the subject of pending or completed civil, commercial, criminal or administrative judicial proceedings (including requests for injunctive measures), initiated by either party.
- Regulatory investigation: the facts are simultaneously the subject of an investigation by a competent supervisory or enforcement authority (for example, the AMF, ACPR, CNIL, DGCCRF or law enforcement).
- The complaint relates to a service provided by a crypto-asset service provider other than the Company, providing in particular order execution services, custody of crypto-assets on behalf of clients or transfer services.

5. Processing times

In accordance with Article 71 of the MiCAR Regulation and Article 6 of Delegated Regulation (EU) 2025/294, Nilos France SAS undertakes to comply with the following timeframes:

Step	Maximum timeframe
Acknowledgement of receipt of the complaint	10 business days from the date of receipt
Reasoned and final response	2 months from the date of receipt of the complaint

If the processing of your complaint requires additional time, in particular due to missing information or dependence on a third-party provider, Nilos France SAS will inform you in writing as soon as possible, specifying the reasons for the delay together with an estimate of the expected resolution timeframe.

6. Handling of your complaint

Upon receipt of your complaint, Nilos France SAS:

- registers your complaint on the day of its receipt in a dedicated register;
- sends you an acknowledgement of receipt specifying the processing timeframes and the available means of recourse;
- investigates your complaint by involving the relevant departments (customer relations, compliance, technical or management) according to the nature of the dispute;
- sends you a reasoned written response, addressing your requests point by point.

If your complaint is rejected in whole or in part, the response will indicate the grounds for rejection as well as the means of recourse available to you.

7. Means of recourse — AMF Mediation

If the response provided to your complaint is not satisfactory, or if you have not received a response within two (2) months, you have the option to refer the matter free of charge to the Mediator of the Autorité des marchés financiers (AMF).

The Mediator may only be referred to after first having submitted a written complaint to Nilos France SAS. You may contact the AMF Mediator:

Online, via the electronic form available at: www.amf-france.org (section “Le médiateur de l’AMF”);

By post: Médiateur de l’AMF, 17 place de la Bourse, 75082 Paris Cedex 2.

Referral to the AMF Mediator is without prejudice to the other legal means of recourse available to you, in particular referral to the competent courts.

8. Data retention

All complaint files are kept by Nilos France SAS for a period of five (5) years from the date of closing of the file or from the termination of the business relationship, in accordance with applicable regulatory requirements.

Personal data collected as part of complaints handling is processed in compliance with Regulation (EU) 2016/679 (GDPR). For any information regarding the processing of your personal data, we invite you to consult Nilos France SAS’s privacy policy available at <https://nilos.io>.

9. Updates

This policy is reviewed at least once a year by the Compliance Officer of Nilos France SAS, or more frequently in the event of significant regulatory changes. The version in force is available on the Company’s website (<https://nilos.io>) and can be communicated upon simple request.

Annex 1: Complaint form

INTRODUCTION OF A COMPLAINT

(to be sent by the client to Nilos France SAS)

1.a. Information concerning the complainant

Name/Legal entity name:

...

First name:

...

EUID or, failing that, national registration or identification number:

...

Legal entity identifier (if available):

...

Customer reference (if available):

...

Address (street, number, floor) (for legal entities, registered office):

...

Postal code:

...

City:

...

Country:

...

Tel.

...

Email:

...

1.b. Contact details (if different from 1.a)

Name/Legal entity name:

...

First name:

...

Address (street, number, floor) (for legal entities, registered office):

...

Postal code:

...

City:

...

Country:

...

Tel.

...

Email:

...

2.a. Information about the legal representative (if applicable) (please attach to this form a power of attorney or any other official document proving the appointment of the representative)

Name/Legal entity name:

...

First name:

...

Registration number and legal entity identifier (if available):

...

Address (street, number, floor) (for legal entities, registered office):

...

Postal code:

...

City:

...

Country:

...

Tel.

...

Email:

...

2.b. Contact details (if different from 2.a)

Name/Legal entity name:

...

First name:

...

Address (street, number, floor) (for legal entities, registered office):

...

Postal code:

...

City:

...

Country:

...

Tel.

...

Email:

...

3. Information concerning the complaint

3.a. Full reference of the crypto-asset service to which the complaint relates (the reference number of the crypto-asset service or any other reference of the transactions concerned...)

...

...

...

3.b. Description of the subject of the complaint

...

...

...

Please provide all documents supporting the facts mentioned.

3.c. Date(s) of the events giving rise to the complaint

...

...

...

3.d. Description of damages, losses or harm caused (if applicable)

...

...

...

3.e. Other remarks or relevant information (if applicable)

...

...

...

Done at (place), on (date)

SIGNATURE

COMPLAINANT/LEGAL REPRESENTATIVE OF THE COMPLAINANT

Documents provided (please tick the corresponding box):

<i>Power of attorney or other official document proving the appointment of the representative</i>	<input type="checkbox"/>
<i>Copy of the contractual documents of the investments to which the complaint relates</i>	<input type="checkbox"/>
<i>Other documents supporting the complaint:</i>	<input type="checkbox"/>
...	
...	
...	