



**DAMAN  
VIRTUAL**

*Daman Virtual*

**COMPLAINTS POLICY**

**Version: V1.1**





## INDEX

Context .....	3
<i>Definition of a complaint</i> .....	3
Types of complaints .....	3
A) Letter .....	3
B) Email .....	3
C) Telephone Call .....	3
Receipt of a potential complaint .....	4
Procedure for handling of a complaint/ potential complaint .....	4
Complaint reference number .....	5
Complaints register on the Compliance drive .....	6
File note .....	6
Complaints Register .....	6
Responses .....	6
Initial Acknowledgement .....	8
Final Response .....	8
Holding Responses .....	8
Investigating Complaints .....	9
Compensation/ Financial Redress .....	9
Filing .....	9
Reporting to the VARA .....	9



# DAMAN VIRTUAL

## CONTEXT

The Virtual Assets Regulatory Authority (“VARA”) in the emirate of Dubai requires Daman (hereafter “Daman”) to have a clear and defined procedure when dealing with complaints from customers, whether the complaint is in the form of a letter, fax, email or telephone call. Failure to respond within the VARA’s timescales may result in Daman being fined.

To ensure that all complaints are handled prompt, with due skill, fair and within the timeframes set by the VARA, Daman must fully adhere to this Complaints Policy (“Policy”).

All employees have a duty to respond to a complaint in a timely, professional and efficient manner by following this, Policy.

### *Definition of a complaint*

A complaint is “... any expression of dissatisfaction, whether oral or written, justified or not.”

An expression of dissatisfaction with the products, platform, service level etc. does not necessarily constitute a complaint; therefore, if in doubt, please ensure to contact the Compliance Department for further verification.

## TYPES OF COMPLAINTS

A complaint can be received in different ways:

### A) Letter - Mail

If uncertain whether the letter constitutes a complaint, the letter must be directed to the Compliance Department. If the Compliance Officer is not available at a reasonable time the issue can be addressed to the Head of Operations within Daman.

### B) Email

If a complaint has been received with either one of the group email addresses or sent to a personal email address, the email must be printed off and retained with all communication in relation to the complaint. If uncertain whether the email constitutes a complaint, the issue must be directed to the Compliance Officer. If the Compliance Officer is not available at a reasonable time, the complaint can be addressed to Head of Operations within Daman.

### C) Telephone Call

If uncertain whether the call constitutes a complaint, then the client must be asked if he/ she wishes to lodge a complaint. At this point the employee must log the following information on the Firms CRM system:

- The telephone extension the call was received on;
- The date of the call;
- Time of the call; and
- The name and ID of the client.

Without this information the complaint may not be addressed sufficiently, and Daman will not be able to log details correctly in the complaints register. Please ensure the client has the name of the employee receiving the complaint.

Contact Methods	
Letter – Mail:	FAO Compliance Officer, Mabrur Ahmed Daman Virtual Asset Brokerage LLC Floor 14, Sheikh Rashid Tower, DWTC P.O. Box 9436,



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	Dubai, UAE
Email:	<a href="mailto:compliance@damanvirtual.com">compliance@damanvirtual.com</a>
Telephone Call:	+971 (0) 525834524

## RECEIPT OF A POTENTIAL COMPLAINT

In the event you receive a complaint or a potential complaint from a client, please ensure to complete the File Note – Potential Complaint (“PC File Note”) as attached to this Policy.

Once completed, please forward the PC File Note to the Compliance Officer, together with the following documentation:

- a) All correspondence with the client and/ or related parties regarding the potential complaint;
- b) A full timeline for the potential complaint.

Upon receipt of the above, the Compliance Department will investigate the potential complaint as per the procedure below and keep you updated on the matter when appropriate and as applicable.

## PROCEDURE FOR HANDLING OF A COMPLAINT/ POTENTIAL COMPLAINT

Upon receipt of the PC File Note, the timeline and all related correspondence with the client/ related parties, the Compliance Officer will assess whether the complaint is an actual complaint, or whether it should be treated as a potential complaint and thus will not follow the standard steps in this Policy.

Where Daman’s virtual assets (VA) activities involve third-party entities (such as technology providers, custodians, or liquidity partners), Daman shall establish appropriate standard procedures to facilitate the intake, escalation, and coordination of complaints that may arise in connection with such third parties. While these entities may play a role in addressing specific aspects of a complaint, Daman acknowledges and accepts full responsibility for ensuring that all client complaints are addressed and resolved.

Daman will not impose any fees or charges for the handling of client complaints, in line with VARA Market Conduct Rulebook – Rule III.A.4. The Firm is committed to a fair, transparent, and accessible complaints process.

If the potential complaint constitutes a complaint, the Compliance Officer will take the following actions when dealing with the client (as furthermore elaborated on in the below sections):

- 1) Provide the client with an *initial acknowledgement* of receipt of the complaint:
- 2) Investigate the complaint:
  - a. Speak to the account executive of the client.
  - b. Review the file/ facts and the correspondence provided by the account executive.
- 3) Respond to the client with a *final response* within 4 weeks if resolved by Daman.
- 4) If not resolved within 4 weeks from receipt of the complaint, the Compliance Officer will provide the client with a *holding response*, elaborating on why the Final Response is delayed and when the client can expect a Final Response.
- 5) Respond to the client with a final response within 8 weeks, if resolved by Daman.
- 6) If it is not resolved within 8 weeks, the Compliance Officer will provide the client with a *holding response* and information on how to contact VARA.
- 7) If further liaison is rejected from the client side, the Compliance Officer will refer the client to VARA.



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All the above steps will be recorded in a file note for filed complaints ("FC File Note") as well as logged in the Complaints Register.

*Please refer to the Complaints Handling Flowchart on page 8 of this Policy.*

*Complaint reference number*

**Please ensure to refer to the complaint reference number for all correspondence relating to the complaint/ potential complaint with the following numbering system:**

**Potential Complaint no. XX:   PC – XX**

**Filed Complaint no. XX:       FC – XX**



# DAMAN VIRTUAL

## COMPLAINTS REGISTER ON THE COMPLIANCE DRIVE

### File note

Any PC File Note received will be transferred to an FC File Note and completed by the Compliance Officer during the investigation and handling of the complaint.

### Complaints Register

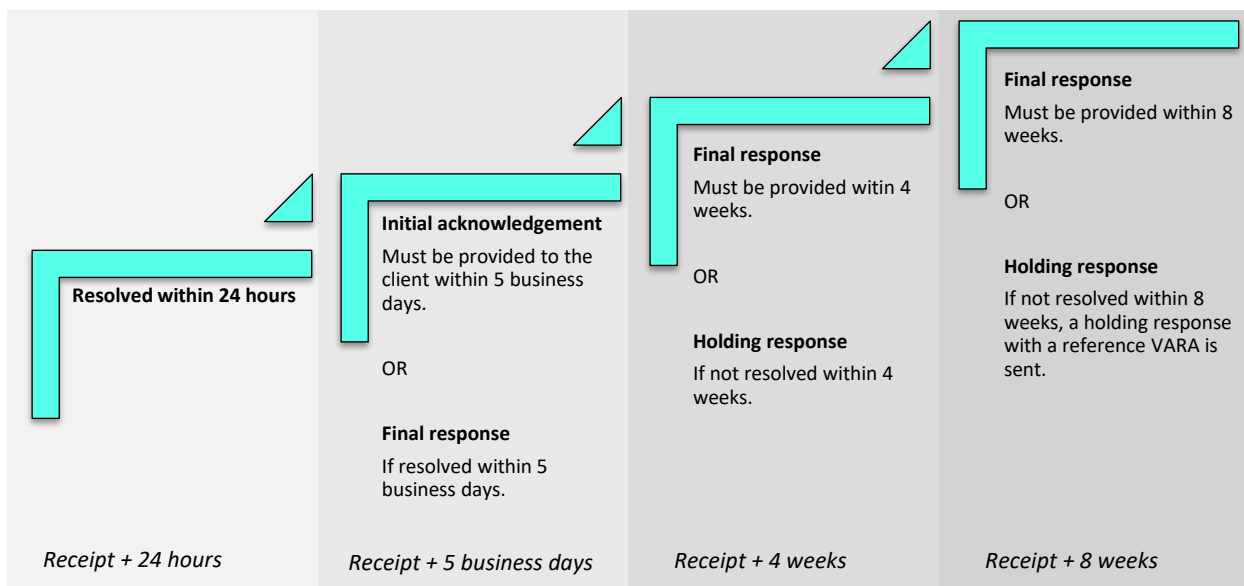
All information will in addition to the FC File Note be logged in the Complaints Register and, in the tab, "Filed Complaint".

Furthermore, a folder in the Compliance drive will be created for each complaint/ potential complaint, where all correspondence and documentation will be saved.

## RESPONSES

The following responses are all sent by the Compliance Officer and are furthermore elaborated below:

- Initial acknowledgement (one version for verbal complaint, and one for written complaint)
- 4-week final response
- 4-week holding response
- 8-week final response
- 8 week holding response



### Complaints that can be resolved within 24 hours

In the event the complaint can be resolved verbally (by telephone) within 24 hours of receiving the complaint, the employee may do so by returning the call and satisfying the complaint over the telephone.

1. Ask the client if they are satisfied that the matter has been resolved;
2. Complete the PC File Note;
3. If yes:
  - No further written communication will be necessary,
  - Forward the PC File Note to the Compliance Officer to sign off.



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4. If no:

- Forward the matter to the Compliance Officer using the PC File Note.



# DAMAN VIRTUAL

## *Initial Acknowledgement*

An initial acknowledgement must be provided to the client within 5 business days of receipt (this will be the date the letter was stamped) of the complaint, regardless of how the complaint was made (unless resolved within 24 hours for verbal complaints).

The initial acknowledgement can be provided in letter form, email, or via a telephone call, providing that this is done within 5 working days of receipt of the complaint. Please ensure to use the template prepared for this purpose and saved on the compliance drive ("Acknowledgement – Verbal Complaint" or "Acknowledgement – Written Complaint").

Enclosed in initial acknowledgement must be:

1. Complaint reference number (used throughout the handling of the complaint);
2. Daman's Client Complaints Procedure.

When contacting the client by letter, a copy of the letter must be retained with the FC File Note.

Update the Complaints Register and FC File Note with the details of the initial acknowledgement.

## *Final Response*

In the event the investigation of the complaint has been completed within 4 weeks from receipt of the complaint, a letter with the final response must be sent to the client. Please ensure to use the template prepared for this saved on the Compliance drive ("4 Week Final Response").

In the event the investigation of a complaint is resolved within 8 weeks a final response must be provided to the client (see next section for holding response, which must be provided to the client in the meantime). Please use the template prepared for this saved on the Compliance drive ("8 Week Final Response").

A copy of the final response must be retained with the FC File Note and any relevant material. A photocopy must not be taken until the letter has been signed by the individual handling the complaint. This letter must be signed off by the Compliance Officer prior to sending it to the client. If this individual is not available, contact Head of Operations.

Complete the relevant part of the FC File Note and update the complaints register.

## *Holding Responses*

If the investigation is not complete and a final response cannot be sent within 4 weeks, a holding response must be sent to the client within 4 weeks of receipt of the complaint. Please ensure to use the template prepared for this saved on the Legal drive ("4 Week Holding Response").

In the event the final response cannot be sent within 8 weeks, and the 4-week holding response has been provided to the client, the client should receive a second holding letter, clearly highlighting the reason for the delay in the final response. Please also use the template prepared for this and saved on the Compliance drive ("8 Week Holding Response").

A copy of the holding responses must be retained with the initial acknowledgement, the FC File Note and any relevant material. A photocopy of the holding responses must not be taken until the letter has been signed by the individual handling the complaint. This letter must be signed off by the Compliance Officer prior to sending the final response to the client. In the event the Compliance Officer is not available contact the Head of Operations.

Update the complaints register and file note and update the Complaints Register.



# DAMAN VIRTUAL

## INVESTIGATING COMPLAINTS

Complaints take on many forms and whilst most will relate to a processes /procedure within Daman, others will relate to a policy set by Daman or by its group. In the event the complaint relates to a policy and similar complaints have been filed regarding this, Senior Management will assess the impact of changing the policy and effect a change together with the Compliance Officer.

## COMPENSATION/ FINANCIAL REDRESS

Any payments for compensation or redress are required to be agreed by Senior Management and logged in to the Complaints Register.

## FILING

Once a complaint has been finalised, all copy documentation along with the completed file notes will be kept on file by the Compliance Department.

## REPORTING TO THE VARA

All complaints filed must be provided to VARA upon their request.

## CLIENT COMPLAINT FORM

Client Complaint Form
This form is provided in accordance with VARA Market Conduct Rulebook - Rule III.A.2. It is designed to facilitate the lodging and proper handling of complaints by clients.
<i>1. Complainant Information</i>
<b>Full Name:</b>
<b>Correspondence Address (optional):</b>
<b>Email Address:</b>
<b>Phone Number:</b>
<b>Preferred Contact Method (Letter/Email/Phone):</b>
<i>2. Complaint Details</i>
<b>Date of Incident/Event:</b>
<b>Details of Complaint (Please describe the issue in detail):</b>
<b>Relevant Transaction ID or Reference Number (if applicable):</b>
<i>3. Desired Resolution</i>
<b>Client Resolution Objective:</b>
<i>4. Declaration</i>
<b>I hereby declare that the information provided above is true and accurate to the best of my knowledge.</b>
<b>Signature:</b>
<b>Date:</b>