



ILIRIKA

Rules on the Appeal Procedure in Relation to Crypto-Assets



ILIRIKA



Article 1 ILIRIKA borzno posredniška d.d., Ljubljana, Slovenska cesta 54A, 1000 Ljubljana (hereinafter: "ILIRIKA" or "the company" or "we") in accordance with Article 71 of Regulation (EU) 2023/1114 on markets in crypto-assets (hereinafter: "MiCA") adopts the following

RULES OF PROCEDURE FOR COMPLAINTS RELATING TO CRYPTO-ASSET SERVICES

1. Introductory provisions

Article 1

The purpose of the complaint procedure is to enable the company's clients to lodge a complaint with the company in relation to the provision of crypto-asset services and to ensure that clients' complaints are dealt with appropriately and that clients are able to exercise their rights. This includes, in particular, the establishment of a complaint management function.

The principles of complaint management for crypto-asset services are based on Article 71(1) of MiCA and the technical standards issued for this purpose (regulatory technical standards).

Article 2

The principles and rules of the internal complaint procedure and out-of-court dispute resolution, as set out in these rules, may be applied in all cases where a client disagrees with ILIRIKA's conduct in the performance of individual services related to crypto-assets.

2. Principles of the complaint procedure

Article 3

Complaints from all parties shall be treated equally.

Complaints shall be considered in chronological order, i.e. complaints received earlier shall be considered before those received later. Each complaint shall be marked with the date of its receipt. A complaint shall be deemed to have been received on the date it arrives at ILIRIKA's registered office.

In accordance with the second sentence of the third paragraph of Article 71 of MiCA, the company is required to keep a record of all complaints received.

Article 4

Complaints shall be resolved quickly and efficiently, with understanding and goodwill.

Complaints shall be resolved in accordance with applicable law, ILIRIKA's general terms and conditions of business applicable at the time of the dispute, the concluded contract, ILIRIKA's price list and good business practices.

3. Internal complaint procedure

Article 5

The procedure for resolving customer complaints at ILIRIKA includes: receiving the complaint, reviewing the complaint, considering the complaint, and responding to the customer regarding the complaint.

The legal department of ILIRIKA is responsible for resolving all customer complaints in cooperation with the department of the company to which the complaint relates, except for verbal complaints where there are no ambiguities and which can also be resolved by other ILIRIKA employees.

The legal department of ILIRIKA is autonomous and independent in resolving customer complaints.

The client must send or submit a written complaint to the company's headquarters at the following address: ILIRIKA, borzno posredniška hiša d.d. Ljubljana, Slovenska cesta 54a, 1000 Ljubljana. The client must submit an electronic complaint to the following address: info@ilirika.si. Verbal complaints may only be submitted in person at the company's headquarters to the competent person who performs services related to crypto-assets for the company and is in contact with the client. The competent person shall record the complaint and the client shall sign it, thereby confirming its content.

Article 6

We require the following information to process the complaint:

- full contact details of the complainant (name and surname, address, telephone number, e-mail address if necessary), including the number of the main account or crypto-asset account,
- a description of the facts relating to the crypto-asset service,
- statement of the reason for the complaint: formulation of the request or indication of what the complaint is intended to achieve (e.g. correction of errors, clarification of facts),
- copies of documents necessary for understanding the claim (if available), and
- power of attorney (e.g. signed authorisation) if the complainant is contacting the company on behalf of another person.

Complaints regarding crypto-asset services are free of charge for the customer.

A form for submitting complaints regarding crypto-asset services is available on the website <https://www.ilirika.si/>.

Article 7

A complaint is late if it is submitted after the deadline prescribed by law or other regulations for the individual right. A complaint is inadmissible if it is submitted by a person who did not have this right. A complaint is improperly submitted if it is not submitted in accordance with these rules.

ILIRIKA is not obliged to consider the complaints referred to in the previous paragraphs of this article.

ILIRIKA shall endeavour to respond to the party as soon as possible, in accordance with the applicable Consumer Protection Act, depending on the nature of the problem. The deadline for responding to a customer complaint is 30 days from the date of receipt of the complaint or the date of the verbal complaint. If ILIRIKA exceeds this deadline, it must notify the customer and explain the reasons for the delay in writing.

If the customer does not receive a response within 8 weeks, the internal complaint procedure is considered to have been concluded negatively, i.e. the customer's complaint is considered unfounded.

Article 8

During the complaint resolution process, the customer has the right to inspect the documentation relating to them and which ILIRIKA is not prohibited from disclosing to third parties.

The party may inspect the documentation referred to in the previous paragraph only in person at the ILIRIKA headquarters, after prior agreement with the ILIRIKA employee who is resolving the party's complaint. At the express request of the party, copies of the aforementioned documentation may be provided to the party against payment.

Article 9

ILIRIKA shall provide a written response to the customer's written and verbal complaint, unless the customer expressly agrees to a response in a different form.

ILIRIKA may also respond to complaints submitted by e-mail in the same form, unless the customer expressly requests a written response.

4. The company's duties and responsibilities regarding customer complaints

Article 10

ILIRIKA keeps records of complaints received and the measures taken to resolve them.

The records are kept in such a way that the data can be accessed and each key stage of the processing of each transaction can be reconstructed, and in such a way that any corrections or other changes and the content of the records prior to any corrections or changes can be easily identified.

The legal department of ILIRIKA is authorised to perform the tasks referred to in this article.

Article 11

When resolving customer complaints, the legal department has the right to obtain the assistance and cooperation of any ILIRIKA employee or external person, if necessary.

If the assistance of external persons or experts is associated with significant material costs for ILIRIKA, the legal department must obtain prior permission from the management to cooperate with them.

Article 12

Complaints by clients against decisions in the internal complaint procedure may be lodged with the ILIRIKA Complaints Commission.

The Commission shall be appointed by the company's management, and no person who has decided on a client's complaint in the internal complaint procedure may participate in it.

5. Out-of-court dispute resolution

Article 13

ILIRIKA provides out-of-court dispute resolution for customers who are consumers through an out-of-court consumer dispute resolution provider recognised by ILIRIKA as competent to resolve disputes in accordance with the Out-of-Court Consumer Dispute Resolution Act (ZIsRPS), namely the European Centre for Dispute Resolution, Tomšičeva ulica 6, 1000 Ljubljana, telephone: 08 20 56 590, email: info@ecdr.si (hereinafter referred to as the Provider).

Any disagreement, dispute or claim between a customer who is a consumer and ILIRIKA that cannot be resolved through the internal complaint procedure may, at the initiative of the customer who is a consumer, be resolved through the out-of-court consumer dispute resolution procedure at the Operator, in accordance with the procedure and in the manner specified in the Contractor's rules on consumer dispute resolution procedures and as specified in the provisions of the Out-of-Court Resolution of Consumer Disputes Act.

ILIRIKA provides out-of-court settlement for customers who are legal entities through the Permanent Arbitration Court at the Chamber of Commerce and Industry of Slovenia, Dimičeva 13, 1000 Ljubljana (hereinafter: Arbitration).

Any disagreement, dispute or claim between a legal entity and ILIRIKA or ILIRIKA's contractual branches that cannot be successfully resolved through internal complaint procedures may be resolved before the Arbitration, either in mediation proceedings in accordance with the provisions of the Rules of Mediation Proceedings before the Arbitration Court at the GZS or in arbitration proceedings in accordance with the Arbitration Rules of the Permanent Arbitration Court at the GZS.

If mediation in mediation proceedings is unsuccessful and if the dispute is not resolved through mediation within 30 days, the dispute shall be finally resolved in arbitration proceedings.

In the event of proceedings before the Arbitration Court, the costs of the proceedings shall be calculated on the basis of its tariff.

Article 14

A party may lodge an appeal against a decision in internal appeal proceedings within 15 days of its receipt with the ILIRIKA Appeals Commission, by registered mail to the ILIRIKA headquarters or by e-mail to: info@ilirika.si, which must be duly substantiated. ILIRIKA is obliged to respond to the party's complaint within 30 days of its receipt.

If the customer, who is a consumer, does not agree with ILIRIKA's decision on the complaint or if they do not receive a response within the period specified in the previous paragraph, the customer, who is a consumer, is entitled to initiate out-of-court consumer dispute resolution proceedings with the Operator, in accordance with the procedure and in the manner specified in the IRPS rules on consumer dispute resolution procedures and as specified in the provisions of the Out-of-Court Resolution of Consumer Disputes Act.

Article 15

A party that is a legal entity may lodge an appeal against a decision in an internal appeal procedure within 15 days of receiving the decision with the Appeals Commission at ILIRIKA, by registered mail to the ILIRIKA headquarters or by e-mail to: info@ilirika.si, which must be duly substantiated. ILIRIKA is obliged to respond to the party's complaint within 30 days of its receipt.

If a party that is a legal entity does not agree with ILIRIKA's appeal decision or if it does not receive a response within the period specified in the previous paragraph, the party that is a legal entity is entitled to initiate either mediation or arbitration proceedings at the Arbitration Court. If the party chooses mediation and the mediation is unsuccessful or if the dispute is not resolved through mediation within 30 days, the dispute shall be finally resolved in arbitration proceedings.

In addition to the complaint procedure, the parties may also assert their claims before civil courts.

6. Informing the party of the rules of the internal complaint procedure and out-of-court dispute resolution

Article 16

Upon conclusion of a contract for services related to crypto-assets, ILIRIKA shall inform the parties of the rules of the internal complaint procedure and out-of-court dispute resolution by publishing these rules in a visible and accessible place in every space where ILIRIKA does business with clients and on the website <http://www.ilirika.si>.

ILIRIKA shall notify the customer of any changes to the rules of the internal complaint procedure and out-of-court dispute resolution by publishing them on the website <http://www.ilirika.si> and in a visible and accessible place in every space where ILIRIKA does business with customers.

The Contractor's rules on consumer dispute resolution procedures are available on the website www.ecdr.si.

The rules on mediation proceedings before the Arbitration Court at the Chamber of Commerce and Industry of Slovenia and the Arbitration Rules of the Permanent Arbitration Court at the Chamber of Commerce and Industry of Slovenia are available on the Arbitration Court website www.sloarbitration.eu.

7. Final provisions

Article 17

These Rules shall enter into force on 1 October 2025.

In Ljubljana, on 1 October 2025

ILIRIKA borzno posredniška hiša d.d., Ljubljana
Management board