




ADVANCED PAYMENT SOLUTIONS LTD

a Money Services Provider, registered and licensed under the [Astana International Financial Centre](#) (AIFC), Republic of Kazakhstan, with the company code [210740900015](#) and license No AFSA-G-LA-2021-0017, regulated by [Astana Financial Services Authority](#) (AFSA).

Address: 55/20, Mangilik El Avenue, Office Number 347-348, Esil district, Z05T3D0, Nur-Sultan, Kazakhstan
Email: support@aps.money

COMPLIANCE MANUAL. COMPLAINT HANDLING POLICY

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1. PURPOSE OF THE DOCUMENT

1.1. Advanced Payment Solutions Ltd (“APS” or the “Company”) aims to provide superior services to all of its Customers. The Company has appointed a Compliance Officer to efficiently handle any complaints from the Customers. This is to allow the Company to resolve and apply mandatory measures to avoid any recurring issues.

1.1. The Company classifies a complaint as any objection and/or dissatisfaction that the Customer may have with regards to the provision of the services provided by the Company. A complaint form is enclosed at the end of this Policy.

2. PROCEDURE

2.1. The Compliance Officer shall be responsible for handling Customer complaints, except in the case where the complaint involves the Compliance Officer, whereby the complaint shall be handled by the representative officer.

2.2. The Customer may register a complaint by completing the complaint form, using any of the following options:

Email: contacts@aps.money and web-site: <https://aps.money>

Postal Address: 55/20, Mangilik El Avenue, office 347-348, Esil district, Z05T3D0, Nur-Sultan, Kazakhstan.

2.3. When the Compliance Officer receives the Customer’s complaint then a written acknowledgement will be sent to the Customer within 7 business days.

2.4. The Company will attempt a final response within 30 business days, however in case we are still not in a position to resolve the issue then the Compliance Officer will notify in writing stating the reasons for the delay and indicate an estimated time to resolve the issue.

2.5. A final response should be provided to the Customer within 60 business days the latest from the date he/she submitted his/her complaint.

2.6. In the case where the complainant is still not satisfied with the Company’s final response, then the complainant can refer his complaint with a copy of the Company’s final response to the Astana Financial Services Authority for further examination.

2.7. The contact details for the Astana Financial Services Authority are set out below:

Customers and individuals who are aggrieved about the services or products offered by Company or their staff may complain to the Astana Financial Services Authority (“AFSA”), financial regulator of the Astana International Financial Centre.

To lodge a complaint to the AFSA contact:

Tel: +7(7172) 64 7260

Email: fintechlab@afsa.kz

Address: AFSA Office, Mangilik El 55/17, pavilion C3.2, Nur-Sultan, Kazakhstan.

3. CUSTOMER RECORDS

3.1. The Customer should provide all relevant documentation as well as any additional information requested by the Compliance Officer in order to ensure all records are collected and the complaint is properly resolved on time. All records will be kept safe as per local requirements and for a period of six (6) years.

COMPLIANT FORM

A. Customer Information:

Name:	Account Number:
Address:	Telephone Number:

B. Brief Summary of the Complaint:

Please describe the product or service you are complaining about (*description, evidence, amount, and suggested way to be solved*):

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- Please enclose any other relevant documentation that may help us to handle the complaint.
- Possible documentation to be provided (customer statement, correspondence with the Company as well as any other supporting documentation to be requested by the Compliance Officer which is relevant to the Customer's complaint)

Date and place

Customer Signature

<u>For internal use only:</u>	
Complaint Received By:	Date:
Acknowledgement sent to Customer:	<input type="checkbox"/> Yes - <input type="checkbox"/> No
Informed Customer of initial action:	<input type="checkbox"/> Yes - <input type="checkbox"/> No
Final response provided to Customer:	<input type="checkbox"/> Yes - <input type="checkbox"/> No
Holding response provided to Customer:	<input type="checkbox"/> Yes - <input type="checkbox"/> No - <input type="checkbox"/> N/A
Signature of Compliance Officer:	Date:

CUSTOMERS SUPPORT POLICY

Levels of Support

Level 1 – This represents generalist support. If this level of support cannot resolve the problem, the Support Request is passed to level 2 support, which is the infrastructure support specialists.

Support Requests are taken by the appropriate level 1 help desk as follows:

Help Desks	Hours	Phone
Level 1	24 hours a day, 7 days a week	
Level 2	8:00 A.M.-12:00 A.M. EST, Monday through Friday (After hours, leave a voice message for a return call the following business day)	
Level 3	8:00 A.M.-4:30 P.M. EST, Monday through Friday (After hours, leave a voice message for a return call the following business day)	

During critical processing periods, support is extended to 24/7 for agreed-upon periods, critical applications, and critical problems based on specific applications.

Level 2 – This is support provided by infrastructure support or subject matter specialists. This level of support does not perform code modifications, if required to resolve the problem. Operational issues will be resolved at this level. If resolution requires code modification, the Support Request is passed to level 3 support.

Level 3 – This is support provided by an application support specialist. This level of support does perform code modifications, if required to resolve the problem.

Severity Codes

The following characteristics are used to identify the severity of a problem report:

- Business and financial exposure
- Work outage
- Number of customers affected
- Workaround
- Acceptable resolution time

It is not necessary (nor is it likely) to have a perfect match of each characteristic to categorize a problem report at a particular severity level. A given problem must be judged against each of the characteristics to make an overall assessment of which severity level best describes the problem. The level 1 support agent and the customer jointly determine the initial severity rating for the report. Level 2 and level 3 support personnel may then negotiate with the customer to modify this severity after the report is elevated to them.

The characteristics below do not cover work requests. Severity levels for work requests may carry a different set of characteristics and weightings. Work requests with a level of effort more than five days are not covered as part of this service level agreement.

Severity 1 (Critical)	Severity 2 (High)	Severity 3 (Medium)	Severity 4 (Low)
Business and financial exposure			
The application failure creates a serious business and financial exposure	The application failure creates a serious business and financial exposure	The application failure creates a low business and financial exposure	The application failure creates a minimal business and financial exposure
Work Outage			
The application failure causes the customer to be unable to work or perform some significant portion of their job	The application failure causes the customer to be unable to work or perform some significant portion of their job	The application failure causes the customer to be unable to perform <i>some small</i> portion of their job, but they are still able to complete most other tasks. May also include questions	The application failure causes the customer to be unable to perform a <i>minor</i> portion of their job, but they are still able to complete most other tasks

		and requests for information	
Number of Customers Affected			
The application failure affects a <i>large</i> number of customers	The application failure affects a <i>large</i> number of customers	The application failure affects a <i>small</i> number of customers	The application failure may only affect one or two customers
Workaround [<i>This bullet carries the heaviest weighting of the characteristics for Severity 1 and 2</i>]			
There is no acceptable workaround to the problem (i.e., the job cannot be performed in any other way)	There is an acceptable and implemented workaround to the problem (i.e., the job can be performed in some other way)	There may or may not be an acceptable workaround to the problem	There is likely an acceptable workaround to the problem
Response Time			
Within one hour	Within four hours	Within eight hours or by the next business day (EST)	Within eight hours or by the next business day (EST)
Resolution Time			
The maximum acceptable resolution time is 24 continuous hours, after initial response time	The maximum acceptable resolution time is five business days	The maximum acceptable resolution time is 30 business days	The maximum acceptable resolution time is 90 calendar days