



## **21X | DLT-Trading and Settlement System**

# **COMPLAINTS MANAGEMENT POLICY**

21X AG  
Große Gallusstraße 18  
60312 Frankfurt am Main  
Germany

May 2025

1.	INTRODUCTION AND PURPOSE .....	3
2.	SCOPE AND DEFINITION.....	3
3.	ORGANIZATIONAL INTEGRATION AND RESPONSIBILITIES.....	3
4.	THE COMPLAINTS PROCESS .....	3
5.	CUSTOMER INFORMATION AND TRANSPARENT COMMUNICATION.....	4
6.	MONITORING, EVALUATION AND CONTINUOUS IMPROVEMENT .....	5
7.	ENTRY INTO FORCE AND REVISION .....	5

## **1. INTRODUCTION AND PURPOSE**

The 21X AG aims to establish an effective, transparent, and customer-focused procedure for handling complaints through this Complaints Management Policy.

Complaints are not merely seen as expressions of dissatisfaction but as valuable indicators for improving processes, products, and service quality. 21X AG commits to addressing all complaints fairly, efficiently, and promptly, thereby reinforcing customer trust in the integrity and performance of the company.

## **2. SCOPE AND DEFINITION**

This policy applies to all complaints related to the provision of investment services by 21X AG.

A complaint is defined as any expression of dissatisfaction by a customer regarding a service, behaviour, or decision of 21X AG, regardless of the form or medium of the communication.

The policy applies to all channels through which complaints may be submitted and covers both formal and informal feedback. It applies to all customers of 21X AG as well as potential clients, business partners, or other third parties raising a legitimate concern.

## **3. ORGANIZATIONAL INTEGRATION AND RESPONSIBILITIES**

The management of 21X AG holds overall responsibility for establishing and monitoring the complaint management system.

Operational implementation is carried out by a designated complaint management function embedded within the Compliance department.

This function is authorized to independently investigate complaints and propose or facilitate appropriate resolutions.

The Compliance function also ensures systematic documentation, regular evaluation, and compliance with regulatory requirements. All employees are obligated to forward complaints promptly to the responsible department. Clear substitution rules ensure continuous complaint processing.

## **4. THE COMPLAINTS PROCESS**

### **4.1 RECEIPT OF COMPLAINTS**

Complaints are primarily received via a structured online form, prominently displayed on the 21X AG website.

This form is designed to be easily accessible and user-friendly, enabling standardized and complete collection of relevant information, including the subject matter, the complainant, and the submission date. The use of this channel ensures automatic, seamless documentation and immediate forwarding to the responsible department.

Additionally, complaints may be submitted informally via email to [complaint@21x.eu](mailto:complaint@21x.eu). Complaints submitted through this channel are also systematically recorded in the central complaints register and processed through the established procedure. This ensures that all customer complaints are properly received and handled, regardless of the submission channel.

#### 4.2 ACKNOWLEDGEMENT OF RECEIPT

Upon receipt of a complaint, the customer will typically receive a formal acknowledgment within three business days. This acknowledgment confirms the receipt of the complaint and outlines the next steps in the process.

If it becomes apparent at this stage that more time will be required to resolve the complaint, the customer will be informed accordingly.

#### 4.3 REVIEW AND ANALYSIS

The complaint is reviewed comprehensively by the designated complaint officer or an authorized expert.

This includes assessing the specific matter and, if necessary, consulting with other involved departments. The objective is to fully understand the issue and provide a fair evaluation.

#### 4.4 RESOLUTION

Following the review, a resolution is developed. Where possible, an amicable resolution is reached with the customer.

If the complaint is partially or fully rejected, the customer receives a comprehensible justification.

The resolution is documented and serves as the basis for future evaluation.

#### 4.5 RESPONSE TO THE CUSTOMER

A final response is generally provided within 15 business days.

If the complexity of the matter prevents this, the customer will be informed in a timely manner about the processing status and the expected completion date.

The response will outline the facts, provide a justification for the decision, and, if applicable, reference external dispute resolution options.

#### 4.6 DOCUMENTATION AND CLOSURE

Each complaint is recorded in a central register managed by the Compliance function.

Documentation includes all key steps of the process and the final assessment.

This structured recording ensures both internal traceability and external auditability.

### **5. CUSTOMER INFORMATION AND TRANSPARENT COMMUNICATION**

21X AG provides clear and comprehensible information about its complaints procedure on its website and in its business documents.

This includes a description of the process and available communication channels (online form, email address). The aim is to enable a low-barrier contact.

Customers receive regular updates on the processing status and are informed about their rights, such as the option to contact an external arbitration body.

## **6. MONITORING, EVALUATION AND CONTINUOUS IMPROVEMENT**

All incoming complaints are regularly analysed to identify systemic weaknesses in processes, products, or customer communication. This analysis is based on data stored in the complaint register.

Derived measures are used for continuous improvement of the complaint management and business processes.

Results are regularly reported to management and integrated into compliance and risk reporting.

## **7. ENTRY INTO FORCE AND REVISION**

This policy takes immediate effect and is reviewed regularly – at least annually – for relevance and adequacy.

Changes in regulatory requirements, internal processes, or strategic direction trigger an update.

The current version is centrally managed and accessible to all employees.