



BitGo

Complaints Management Policy
BitGo Europe ApS

Page 1 of 10
Date: 27 June 2025
Version: 1.0

Complaints Management Policy

BitGo Europe ApS

Version 1.0

As of: 1 January 2025

Document management

Table 1: Document details

Item	Detail
Function	Compliance & Legal
Document type	Policy
Version	1.0
Status	Approved
Published on	27 June 2025
Last reviewed on	13 June 2025
Owner(s)	Harald Patt
Distribution	To all employees of BitGo Europe ApS
Confidentiality	Public

Table 2: Approval records

Record	Signature(s)
1st Approver	Signed by:  0DD38B8F79EE4B5 Name: Harald Patt Approval date: 26 June 2025 11:55 PM PDT



Table of contents

1 Introduction and scope	4
1.1 Introduction	4
1.2 Scope	4
2 Relevant laws and regulations	4
3 Roles and responsibilities	5
4 Definitions and objectives	6
4.1 Definitions	6
4.2 Objectives for complaints management	6
4.3 Principles	6
5 Complaints Handling Process	6
5.1 Submission of Complaints	6
5.2 Acknowledgment of Complaints	7
5.3 Investigation and Resolution	7
5.4 Response to the Complainant	7
5.5 Right to Escalate	8
6 Internal Reporting and Record-Keeping	8
6.1 Complaints Register	8
6.2 Regular Reporting	8
6.3 BaFin Reporting	9
7 Staff Training and Awareness	9
8 Continues Improvement	9
9 Confidentiality and Data Protection	9
10 Compliance with this policy	9
10.1 Review and approval	10
10.2 Exceptions to the policy	10



1 Introduction and scope

1.1 Introduction

BitGo Europe ApS (hereinafter “BitGo”) is a crypto asset firm providing a range of activities including custody, exchange and transfer. The purpose of this Complaints Management Policy is to ensure that BitGo handles customer complaints effectively, fairly, and transparently in compliance with the regulatory requirements of the Danish FSA and other applicable laws. The policy is designed to safeguard the rights of clients, maintain trust in our services, and ensure a high standard of customer satisfaction.

This policy applies to all employees of BitGo who handle, manage, or have oversight of customer complaints.

1.2 Scope

This policy sets out the principles and procedures for complaints management and describes specific application for functions or to all employees. It applies to all customer complaints received by BitGo, including complaints relating to:

- Digital asset custody services,
- Crypto exchange and transfer services
- Transaction processing and settlements,
- Customer account management and access,
- Fees and charges,
- Data protection, cybersecurity, or privacy issues,
- Regulatory compliance, and
- Any other aspects of service delivery.

2 Relevant laws and regulations

BitGo is regulated under the following applicable laws and regulations:

- The Danish Financial Business Act
- The Danish Anti-Money Laundering Act
- MiCA: EU Markets in Crypto-Assets Regulation

This policy adheres to the draft regulatory technical standards (RTS) EBA/RTS/2024/02 procedures for handling complaints under Article 31 of MiCA.

3 Roles and responsibilities

The following defines the management level and key roles responsible for implementing this policy. These roles are designated as having specific responsibilities in implementing and monitoring the various provisions of the policy.

Role	Responsibilities
Executive Board	• Promote and implement a strong culture of compliance and excellence

**BitGo****Complaints Management Policy**
BitGo Europe ApSPage 5 of 10
Date: 27 June 2025
Version: 1.0

	- in customer service; - Review this Policy at least annually; approve exceptions to the policy; - Review reporting on complaint trends and root causes and corrective actions; - Ensure alignment with strategy, governance, and legal compliance; - Endorse the implementation and monitoring of this complaints management policy.
Customer Service	- Understand and comply with this Policy; and identify and deliver complaints, as defined in this policy, in a timely manner to Compliance; - maintain procedures for operational complaints management.
Compliance	- Policy owner, including review and updates; - Oversee the complaint management process (the complaint management function), including appropriateness and timeliness of complaint resolutions; - Ensure complaints are investigated in accordance with this Policy evaluating each complaint to determine whether the complaint has specific regulatory and/or legal requirements; - Consult with Legal Counsel on all complaints that involve a realistic threat of imminent litigation, claims of discrimination, or violations of law; - Maintain documentation associated with the resolution of complaints; - Ensure relevant BitGo representatives receive training on complaint handling; - Monitor complaint trends and root causes, and recommend business and system changes and upgrades as needed; and Report on Policy effectiveness, including complaint trends; - Report on complaints performance to the management team.

4 Definitions and objectives

4.1 Definitions

For the purposes of this policy, a "complaint" is defined as any expression of dissatisfaction by a client or potential client regarding the services provided by BitGo (including where those products and services are provided by third parties including BitGo group entities). This includes any dissatisfaction related to the quality of services, compliance with legal and regulatory obligations, or the behavior and actions of employees or representatives of BitGo.

4.2 Objectives for complaints management

The objectives of BitGo's complaints management process are to:

1. Provide information on the complaint handling process to customers on request and when acknowledging a complaint.
2. Provide a template for the submission of complaints.



3. Acknowledge receipt of complaints.
4. Ensure complaints are handled promptly, fairly, and transparently.
5. Address and resolve customer complaints in accordance with applicable laws and regulations.
6. Identify root causes of complaints and implement measures to prevent future occurrences.
7. Maintain records of all complaints and track the status of complaint resolutions.
8. Ensure regulatory reporting obligations regarding complaints are met.

4.3 Principles

BitGo's complaints management follows the following principles. It is mandatory to:

- Log all complaints in a complaint tracker for proper tracking and handling;
- Handle complaints fairly and in a manner consistent with the Company's customer service standards;
- Evaluate the severity of each complaint and determine whether the complaint has specific regulatory and/or legal implications;
- Investigate the circumstances that gave rise to the complaint;
- Resolve the complaint; and
- Consider whether the complaint has systemic implications to other customer accounts or relationships and, if so, take appropriate action to resolve the issues for those customers.

5 Complaints Handling Process

5.1 Provision of information on complaints handling

BitGo will provide, on request and when acknowledging a complaint, clear, accurate and up to date written information about BitGo's complaint handling procedure. This will include:

- The conditions for a complaint to be considered admissible;
- Details of how to complain, including the type of information to be provided by the complainant and the identity and contact details of the person, or department, to whom the complaint should be addressed;
- The procedure BitGo will follow including when it will be acknowledged, indicative handling timelines and the availability of a competent authority, an ombudsman or an alternative dispute resolution mechanism;
- Information that complaints are filed and handled free of charge;
- An explanation of BitGo's obligation to keep the complainant informed while the complaint is being handled.

A description of the complaints handling procedures will be published in an easily accessible manner on BitGo's website.

Information about the complaint handling process will be published in all languages used to market the services.



5.2 Submission of Complaints

Customers can submit complaints through various channels:

- Email: complaints@bitgo.com
- Online Portal: A dedicated online form is available on the BitGo (bitgo.com) website for submitting complaints.
- Postal Mail: BitGo Europe ApS, C/O Plesner Advokatpartnerselskab, Amerika Plads 37, 2100 Copenhagen Ø.

BitGo Europe will ensure that all complaint channels are clearly communicated to clients and are easily accessible.

Complaints can be filed in the languages used to market BitGo's services. In addition complaints can be filed in the official languages to the member state in which either BitGo or the customer is based.

5.3 Acknowledgment of Complaints

Upon receipt of a complaint, BitGo will:

- **Acknowledge** the complaint within **five (5)** business days of receipt.
- Provide the customer with a unique **reference** number and information on the expected timeline for resolution.
- **Inform** the customer of the next steps in the complaints process.

Complaint acknowledgements will include the date the complaint was received. Where an electronic complaint form is filed a copy of the submitted complaint will be included in the acknowledgement. The complainant will also be provided with a privacy notice.

5.4 Investigation and Resolution

The following steps are to be completed within the defined time frames:

- **Assessment:** upon receipt of a complaint BitGo will assess whether the complaint is clear and complete and contains all relevant information and evidence – BitGo will inform the customer if the complaint is admissible. Where this is not the case BitGo will inform the complainant any additional information or evidence necessary to handle the complaint. Where the complaint is inadmissible BitGo will provide a clear explanation of the reasons it is being rejected.
- **Assignment:** Complaints will be assigned to the relevant department or person responsible for investigating the issue.
- **Investigation:** An impartial and thorough investigation will be conducted. This may include gathering information from the customer, reviewing relevant documentation or transactions, and interviewing employees if necessary. If it is identified that a different entity is responsible for the subject of the complaint (and that entity is therefore responsible for investigating the issue) BitGo will provide a clear explanation of this to the customer and provide the contact details of the relevant entity.



- **Resolution Timeline:** BitGo will aim to resolve complaints within 15 business days after receipt of a complaint and within a maximum of **six (6) weeks** from receipt. If the resolution takes longer, the customer will be informed of the reason for the delay and the expected resolution date.

5.5 Response to the Complainant

BitGo will provide a formal written response to the complainant, which will include:

- A clear **explanation** of the outcome of the investigation in plain language which includes a thorough explanation of BitGo's position on the complaint.
- The proposed **resolution** or remedy, if applicable.
- Details of any corrective **action** taken, if required.
- Information on the **right to escalate** the complaint to an external authority, ombudsman or alternative dispute resolution mechanism if the customer is dissatisfied with the resolution.

5.6 Right to Escalate

If the customer is dissatisfied with the final resolution provided by BitGo, they have the right to escalate the complaint to the following external bodies:

6 Internal Reporting and Record-Keeping

6.1 Complaints Register

BitGo will maintain a Complaints Register that records all complaints received. The register will include:

- Date of receipt of the complaint,
- Complainant's details (where provided),
- Nature and details of the complaint,
- Actions taken to investigate and resolve the complaint,
- Final resolution and date of closure.

6.2 Regular Reporting

A quarterly report on complaints will be submitted to the senior management and the Risk Management Committee of BitGo. This report will include:

- The number of complaints received.
- The nature and types of complaints.
- Resolution times and outcomes.
- Any trends or systemic issues identified.
- Recommendations for changes to policies or procedures, where necessary.



Complaint trends will be based on analysis of complaint handling data to ensure systemic or recurring issues are identified and addressed. BitGo will:

- Analyse the causes of individual complaints so as to identify root causes common to types of complaints;
- Consider whether such root causes may also affect other processes or products including those which have not been directly complained of;
- Correct such root causes.

7 Staff Training and Awareness

BitGo will ensure that all employees, especially those handling customer interactions, are trained in the complaints management process. Regular training will be provided on:

- Complaint identification and escalation,
- Handling complaints professionally and empathetically,
- Record-keeping and reporting obligations.

Additionally, the Compliance Officer will ensure that employees are aware of their role in preventing recurring issues and promoting customer satisfaction.

8 Continuous Improvement

The complaints management process will be reviewed annually, and improvements will be made where necessary to ensure efficiency, transparency, and compliance with regulatory changes. Lessons learned from customer complaints are reviewed monthly and will be used to improve BitGo's products, services, and internal procedures.

9 Confidentiality and Data Protection

BitGo will treat all personal data and complaint-related information in accordance with applicable data protection laws, including the General Data Protection Regulation (GDPR). Complaint information will be handled confidentially and only disclosed to those who need to be involved in the investigation and resolution process. Data will only be shared externally as required by law or with the customer's consent.

10 Compliance with this policy

Violation of this policy and non-compliance with the requirements set forth herein may constitute a breach of duty under the employment contract and/or a violation of applicable law and may be penalized accordingly.

10.1 Review and approval

A review of this policy will be conducted by the functional owner at least annually, or more frequently as

**BitGo****Complaints Management Policy**
BitGo Europe ApSPage 10 of 10
Date: 27 June 2025
Version: 1.0

needed, and significant changes will be approved by the functional Manager, the respective Managing Director and senior management.

10.2 Exceptions to the policy

Exceptions to the requirements and principles set forth in this policy may be granted only when there is a clear justification for doing so - confirmed by a thorough review of the situation - and only to the minimum extent necessary to meet a legitimate exception. Exceptions will not be granted where they will breach regulatory requirements

All such exceptions to the applicable policy must be documented and include the following information:

- Nature of the exception;
- Explanation of why the exception is necessary;
- Risks associated with the exception;
- Evidence of approval.

Exceptions to this policy require the approval of the Executive Board. Prior to approval of exceptions to this policy, they must be reviewed by the Risk Management function based on the information defined above.

All approved exceptions must be reviewed periodically for appropriateness and may be revoked alternate at any time.

* * *