



Weltix

Weltix Fiduciaria S.p.A. Complaints Management Procedure Version 7 April 2025



Weltix
www.weltix.tech

***Approved by the Board of Directors and
presented by the Sole Internal Control Function***

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1) Introduction

Weltix Fiduciaria Digitale S.p.A. (the “**Company**” or “**Weltix**”), in its capacity as a fiduciary company operating pursuant to Law No. 1966/1939, dedicates significant commitment to procedures aimed at encouraging customers to submit complaints in order to:

- ensure an adequate level of protection for Trustors through an effective internal governance system;
- prevent client attrition and negative word-of-mouth (reputational risk);
- identify its own organisational and procedural shortcomings and learn how to correct them;
- gather information on new expectations;
- win back lost or dissatisfied customers.

In handling complaints, the Company intends to:

- provide a swift, timely and satisfactory response to complainants;
- ensure a prompt, timely and fair examination of complaints;
- ensure systematic and consistent handling of complaints;
- enhance the Company’s ability to identify trends underlying the development of complaints and, over time, eliminate any recurring causes;
- encourage a Trustor-oriented approach;
- establish a better system for the continuous review of processes and the constant improvement of its service level.

In particular, in drafting this procedure (**Complaints Management Procedure**) Weltix intends to operate in accordance with the following principles:

Visibility: information on how and where to submit a complaint will be clearly publicised on the Weltix website. In particular, clear and accurate information will be provided regarding:

- the conditions for the admissibility of complaints;
- the indication that complaints are submitted and handled free of charge;
- a detailed description of how complaints may be submitted.

Accessibility: the complaint-handling process will be easily accessible to all complainants;

Responsiveness: complainants will be treated courteously and informed of the progress of their complaint throughout the complaint-handling process;

Objectivity: the complaint-handling process will handle each complaint in a fair, objective and unbiased manner;

Costs: access to the complaint-handling process will be free of charge for the complainant;

Confidentiality: information personally identifying the complainant will be protected so as not to be disclosed without the express consent of the client or complainant;

Accountability: Weltix will ensure clear responsibilities and delegations of authority regarding the actions and decisions of the organisation concerning the handling of complaints;

Continuous improvement: the continuous improvement of the complaint-handling process and product quality will be a permanent objective of the organisation.

2) Main obligations

Head of Legal¹

Receives complaints submitted, updates the complaints register, and handles complaints in accordance with the procedure set out below. In addition, on an annual basis, reviews the complaints submitted and, together with the Head of the Compliance Function, assesses any corrective actions to be implemented.

Head of the Compliance Function

Carries out checks to ensure that the handling of complaints submitted complies with company policy. In addition, on an annual basis, reviews the complaints submitted and, together with the Head of Legal, assesses any corrective actions to be implemented.

Management Body

Annually updates this procedure, upon proposal of the Head of Legal and the Head of Compliance.

3) Specific obligations: the Complaints Management Procedure

The person responsible for handling complaints submitted (**Responsible Person**) shall be the Head of Legal of Weltix Fiduciaria.

The entire procedure is conducted by email. Complaints must be sent by email to the address **reclami.fiduciaria@weltix.tech**.

¹ Task performed on an interim basis by the Operations Director

In handling complaints Weltix will communicate with complainants in plain, clear and easily understandable language.

1. START OF THE PROCEDURE: ACKNOWLEDGEMENT OF RECEIPT AND ADMISSIBILITY CHECK

Upon receipt of a complaint, within 10 days of receipt, the Responsible Person confirms receipt of the complaint to the complainant by means of an acknowledgement of receipt containing:

- a. Its identity and telephone and email contact details, specifying that the Responsible Person is the party to whom requests concerning the complaint may be addressed;
- b. Whether the complaint is admissible;
- c. If the complaint is not admissible, a clear and comprehensible explanation of the reasons for inadmissibility;
- d. The opening of the complaint analysis and investigation phase, during which the Responsible Person may also put the complainant in contact with the parties involved in the facts giving rise to the complaint, with a view to seeking possible solutions;
- e. the time limit within which the decision will be notified to the complainant (in any case, not exceeding 30 days).

2. ANALYSIS OF THE COMPLAINT: INVESTIGATION OF COMPLAINTS

If the Complaint is admissible, the Responsible Person assesses without undue delay whether the complaint is clear and complete and whether it contains all relevant information and evidence.

If the complaint is unclear or incomplete, the Responsible Person will promptly request any additional information or evidence necessary for the proper handling of the complaint.

The Responsible Person then endeavours to gather and examine all information and evidence relating to the complaint.

Each complaint will be recorded together with all supporting documentation and will be assigned an identification code; it will then be classified under one of the following thematic areas:

1. legal and compliance issues;
2. technical issues relating to the operation of the portal and IT infrastructure;
3. issues relating to the execution of the fiduciary mandate;
4. issues not falling within the above categories.

Based on the classification, the Responsible Person identifies any external resources to be

involved in the analysis and handling of the complaint.

Weltix, and in particular the Responsible Person, will keep the complainant informed throughout the procedure of any further measures taken to handle the complaint and will respond without undue delay to reasonable requests for information submitted by the complainant.

3. DECISION PHASE: DECISION AND COMMUNICATION OF THE DECISION

In its decision on a complaint, the Responsible Person addresses all the issues raised therein and states the reasons for the outcome of the investigation. Such a decision is consistent with any decisions previously adopted by Weltix in relation to similar complaints, unless Weltix is able to justify why a different conclusion has been reached.

The Responsible Person notifies the complainant of the outcome of the complaint and the measure adopted, which is kept in the electronic file relating to the complaint, together with any consequences of the complaint, the solution, and the corrective action.

The decision on the complaint is aligned with previous decisions on similar matters, unless there is a justified reason for adopting a different approach.

DELAYS: Where, due to exceptional circumstances, the decision on the complaint cannot be issued within the time frame communicated to the complainant in the acknowledgement of receipt, the Responsible Person promptly informs the complainant of the reasons for the delay, specifying the time frame within which the decision will then be adopted.

It should be noted that this time limit is suspended in the event of additional information or clarifications, until such additional information or clarifications have been completed.

In the event of a negative response to the complaint, such a decision will be adopted by a specific resolution of the Management Body.

4) Specific controls

4.1) Register

The Company has established a register of complaints received (**Register**).

The Register (accessible only to the Responsible Person) will be completed and updated by the Responsible Person for this procedure as soon as the complaint is received, and will also be used to monitor the handling stages of each individual complaint.

The Register will record the following information:

- The sequential number of the complaint;



- the name, including the email address, of the complainant;
- the date of receipt of the complaint;
- the subject matter of the complaint;
- the reason for the complaint;
- any external advisor involved to support the Responsible Person;
- the handling status;
- the solution adopted by Weltix;
- the corrective action implemented by Weltix;
- any additional notes.

4.2) Publication of complaints

Every year, the annual report will be published on the Weltix website, in the "Complaints" section, in the same manner as required for banking and financial intermediaries.

5) Controls on compliance with the procedure

5.1) Review of the procedure: This procedure is subject to annual review by the Responsible Person (who will verify that the procedure is up to date and complete, and will also check for any updates to the relevant regulations). The Responsible Person will then report to the Management Body on the checks carried out and, where necessary, propose supplementary/amending actions to be submitted for approval by the Management Body itself.

5.2) Review of Complaints: Annually, the Responsible Person for the Procedure also reviews all the proceedings received (assessing, for example, the number of complaints received, whether there are complaints concerning similar cases, and the decisions adopted) and reports to the Management Body in order to assess any actions to be taken to improve the service provided to clients.

5.3) Report to the Management Body: Annually, the Head of the Compliance Function reports to the Management Body on compliance with the Procedure.

6) Documentation

All documentation relating to complaints submitted shall be duly filed and retained by the Responsible Person.

7) Training

The Company will conduct an annual staff training programme on the content of this Procedure.