

## Client Grievance and Resolution Policy

### 1. Purpose

Dinaria LLC's ("Dinaria") Client Grievance and Resolution Policy establishes a structured and transparent framework to ensure that all complaints, concerns, or disputes raised by clients, users, or business partners are addressed in a timely, consistent, and equitable manner. The primary objective of this policy is to proactively identify and resolve issues, foster client confidence, and ensure full compliance with applicable regulatory obligations governing Money Services Businesses (MSBs) under both U.S. and international financial regulations.

### 2. Scope

This policy applies to all grievances submitted to Dinaria, whether initiated by an individual client, institutional customer, third-party service provider, financial institution, or governmental/regulatory authority. It encompasses the full range of services provided directly by Dinaria or through its affiliated entities, including but not limited to:

- Payment processing and fund transfer services
- Customer onboarding and Know Your Customer (KYC) verification
- Foreign exchange and currency conversion operations
- Technical support and system-related assistance
- Compliance operations and regulatory submissions

### 3. Definition of a Grievance

A grievance is defined as any written, verbal, or electronic expression of dissatisfaction or concern from a client, partner, or stakeholder regarding Dinaria's services, operations, conduct, or policies, in which the complainant reasonably expects a formal response, explanation, or corrective action.

### 4. How to Submit a Grievance

Grievances may be submitted through any of the following official channels:

- Email: [info@dinaria.com](mailto:info@dinaria.com)
- Postal mail:  
**Dinaria LLC**  
1290 US Highway 2 East, Suite 1117  
Kalispell, MT 59901  
United States

To ensure efficient and appropriate handling, the grievance should include the complainant's full name, contact information, reference to any relevant account or transaction, and a concise but detailed description of the issue.

## 5. Acknowledgment and Response Times

Grievances will be formally acknowledged within three (3) business days of receipt.

A full written response outlining the outcome, findings, and any applicable resolution will be provided within fifteen (15) business days, except where extended investigation is warranted.

In the event of delays, the complainant will be notified of the revised expected timeline and reason for the extension

## 6. Grievance Handling Procedure

1. The grievance is logged in Dinaria's internal complaint register and assigned a unique reference number.
2. The Compliance Officer or designated representative initiates a preliminary review within 48 hours.
3. All relevant transaction records, communications, and evidence are examined.
4. If necessary, further clarification or documentation is requested from the complainant.
5. A written resolution is documented and delivered to the complainant, including rationale and any corrective actions.
6. All grievance documentation is retained for a minimum of five (5) years, in compliance with audit and regulatory standards.

## 7. Escalation Process

If the complainant is dissatisfied with the initial resolution, they may formally request escalation to Dinaria's senior management. Upon escalation, the grievance will be reassessed, and a final written decision issued within ten (10) business days.

Where grievances involve legal exposure, regulatory risk, or reputational concerns, Dinaria reserves the right to consult with external legal counsel or compliance specialists.

## 8. Confidentiality

All grievances shall be handled with the highest level of confidentiality. Personally identifiable information and case details shall be accessible only to personnel directly involved in the resolution process and protected in accordance with applicable privacy and data protection laws, including the General Data Protection Regulation (GDPR) and relevant U.S. federal and state privacy statutes.

## 9. Monitoring and Reporting

The Compliance Department shall maintain grievance metrics and produce internal reports that analyze:

- Emerging trends in the nature and frequency of grievances
- Root causes of recurring or systemic issues
- Preventive and corrective measures implemented

These reports will be reviewed periodically by Dinaria's executive leadership and shared with regulators or auditors upon request.

## 10. Review of Policy

This policy shall be reviewed and updated at least annually, or sooner if triggered by:

- Material changes in applicable regulations
- Findings from internal or external audits
- Substantive operational, product, or risk developments

All amendments must be reviewed **and approved by the Compliance Officer and the Managing Member of Dinaria prior to adoption.**

## 11. Non-Retaliation Statement

Dinaria ensures that no complainant shall be subject to retaliation, discrimination, or disadvantage for submitting a grievance in good faith. All feedback is regarded as an opportunity to improve our services, processes, and client experience.