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ZEROLINK INC

# Dispute and Complaint Handling Policy

Customer Resolution Framework

## Fair and Transparent Process

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6510 S Academy Blvd Ste A 642, Colorado Springs, CO 80906, USA

Registered Money Services Business - FinCEN Compliant



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# 1. Policy Overview

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## 1.1 Purpose and Scope

This Dispute and Complaint Handling Policy establishes the framework for receiving, investigating, and resolving customer complaints and disputes in a fair, transparent, and timely manner. This policy applies to all complaints and disputes received by ZeroLink Inc from customers regarding our products, services, employees, or business practices.

### Policy Scope

This policy covers:

- All customer complaints received through any channel
- Transaction disputes and errors
- Service-related grievances
- Fee and pricing disputes
- Privacy and data protection concerns
- Any other customer dissatisfaction with our services

## 1.2 Policy Objectives

ZeroLink Inc is committed to:

- **Fair Treatment:** Treating all customers fairly and consistently regardless of the nature or value of their complaint
- **Timely Resolution:** Resolving complaints and disputes within defined timeframes
- **Transparency:** Maintaining clear and open communication throughout the resolution process
- **Accessibility:** Making the complaint process easy to access and understand
- **Continuous Improvement:** Using complaint data to improve products, services, and processes
- **Regulatory Compliance:** Meeting all applicable regulatory requirements for complaint handling

## 1.3 Regulatory Framework

This policy is designed to comply with applicable regulations and industry standards, including:

## 1. Policy Overview

<b>Regulation/Standard</b>	<b>Requirement</b>
Consumer Financial Protection Bureau (CFPB)	Fair and timely complaint handling
State Money Transmission Laws	State-specific complaint resolution requirements
Electronic Fund Transfer Act (EFTA)	Error resolution procedures
Regulation E	Consumer liability and error resolution
State Consumer Protection Laws	Consumer rights and protections

## 2. Definitions

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### **Key Terms and Definitions**

**"Complaint"**

Any expression of dissatisfaction, whether oral or written, about ZeroLink Inc's products, services, employees, or business practices.

**"Complainant"**

The individual or entity making a complaint, which may include customers, authorized representatives, or consumer advocacy organizations.

**"Dispute"**

A disagreement between ZeroLink Inc and a customer regarding a specific transaction, fee, service, or account activity.

**"Error"**

An incorrect transaction, unauthorized transaction, or other mistake in the processing of customer instructions.

**"Resolution"**

The outcome of a complaint or dispute investigation, including any corrective action or remedy provided.

**"Service Level Agreement (SLA)"**

The timeframe within which ZeroLink Inc commits to acknowledge, investigate, and resolve complaints.

**"First Contact Resolution (FCR)"**

Resolution of a complaint at the initial point of contact without requiring escalation.

**"Escalation"**

The process of referring a complaint to a higher level of authority for review and resolution.

## 3. Types of Complaints and Disputes

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### 3.1 Complaint Categories

Category	Description	Examples
Transaction Issues	Problems with specific transactions	Delayed transfers, incorrect amounts, failed transactions
Fee Disputes	Disagreements about fees charged	Unexpected fees, fee calculation errors, refund requests
Service Quality	Dissatisfaction with service delivery	Long wait times, unhelpful staff, technical issues
Account Issues	Problems with account management	Access issues, account restrictions, closure disputes
Fraud/Security	Security-related concerns	Unauthorized transactions, identity theft, account compromise
Privacy/Data	Concerns about data handling	Unauthorized data sharing, data accuracy, access requests
Communication	Issues with customer communications	Missing notifications, misleading information, language barriers
Regulatory	Compliance-related concerns	Disclosure issues, licensing questions, legal compliance

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## 3.2 Dispute Categories

### Priority Dispute Categories

The following dispute categories receive priority handling due to their potential financial impact or regulatory significance:

- **High Priority:** Fraud claims, unauthorized transactions, errors exceeding \$1,000
- **Medium Priority:** Transaction errors, fee disputes, service failures
- **Standard Priority:** General service complaints, information requests, minor issues

## 4. Complaint Handling Process

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### 4.1 Complaint Receipt

ZeroLink Inc accepts complaints through multiple channels to ensure accessibility:

Channel	Contact Details	Availability
Email	complaints@zerolink.inc	24/7
Phone	Customer Service Hotline	Business Hours
Mail	6510 S Academy Blvd Ste A 642, Colorado Springs, CO 80906	N/A
Online Portal	Customer account portal	24/7
In-Person	Authorized agent locations	Location hours

### 4.2 Acknowledgment

#### Acknowledgment Standards

Channel	Acknowledgment Timeframe
Email/Online	Within 24 hours
Phone	Immediate acknowledgment during call
Mail	Within 5 business days of receipt

All acknowledgments include:

- Unique complaint reference number
- Summary of the complaint
- Expected resolution timeframe
- Name and contact details of the handling officer
- Information about escalation options

## 4.3 Investigation

### Investigation Process

#### 1 Initial Assessment

Review complaint details, categorize priority, and identify relevant account/transaction information.

#### 2 Information Gathering

Collect relevant records, transaction logs, communications, and any other pertinent documentation.

#### 3 Analysis

Analyze the facts, identify root causes, and determine appropriate resolution options.

#### 4 Resolution Decision

Determine the appropriate resolution based on findings, policy, and regulatory requirements.

## 4.4 Resolution

Resolution options may include:

Resolution Type	Applicable Situations
Correction/Adjustment	Transaction errors, incorrect fees
Refund	Fee disputes, service failures
Reprocessing	Failed or incorrect transactions
Apology/Explanation	Service issues, communication failures
Policy Exception	Special circumstances, goodwill gestures
Referral	Issues requiring specialized handling

## **4.5 Communication**

Throughout the investigation and resolution process, ZeroLink Inc maintains regular communication with the complainant:

- Progress updates if resolution extends beyond initial timeframe
- Requests for additional information when needed
- Clear explanation of the final resolution
- Information about escalation options if dissatisfied

## 5. Dispute Resolution Process

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### 5.1 Informal Resolution

ZeroLink Inc encourages the resolution of disputes at the earliest possible stage through informal channels:

#### Informal Resolution Options

- **Customer Service:** Initial point of contact for all concerns
- **Account Manager:** Dedicated support for business customers
- **Online Portal:** Self-service dispute submission and tracking
- **Phone Support:** Direct communication with support staff

### 5.2 Formal Dispute Process

If informal resolution is unsuccessful, customers may initiate a formal dispute:

#### Formal Dispute Steps

- 1 Formal Dispute Submission**  
Submit written dispute with supporting documentation via email or mail.
- 2 Dispute Registration**  
Dispute logged in system with unique reference number assigned.
- 3 Formal Investigation**  
Comprehensive investigation conducted by Dispute Resolution Team.
- 4 Resolution Proposal**  
Formal resolution proposal communicated to customer.
- 5 Customer Response**  
Customer accepts or requests further review.

### 5.3 Escalation Procedures

If a customer is dissatisfied with the initial resolution, they may escalate the matter:

Escalation Level	Handler	Timeframe
Level 1 - Supervisor Review	Customer Service Supervisor	Within 2 business days
Level 2 - Management Review	Operations Manager	Within 5 business days
Level 3 - Executive Review	Compliance Officer / Director	Within 10 business days

## 6. Service Level Agreements (SLAs)

### Standard Resolution Timeframes

Priority Level	Acknowledgment	Initial Response	Resolution Target
Critical (Fraud/Security)	Immediate	4 hours	24-48 hours
High (Transaction Errors)	Within 4 hours	24 hours	3-5 business days
Medium (Fee/Service Issues)	Within 24 hours	48 hours	7-10 business days
Standard (General Complaints)	Within 24 hours	72 hours	10-15 business days

### 6.1 Regulatory Timeframes

Certain disputes are subject to specific regulatory timeframes:

Dispute Type	Regulatory Requirement	Timeframe
EFTA/Regulation E Errors	Investigation and provisional credit	10 business days (45 days for new accounts)
Unauthorized Transactions	Customer liability determination	Within 10 business days of notification
Documentation Requests	Provide transaction receipts	Within 10 business days

### 6.2 Extension Procedures

If additional time is required for investigation:

- Customer will be notified before the original deadline expires
- Reason for extension will be provided
- Expected completion date will be communicated
- Progress updates will be provided during extended investigation

## 7. Roles and Responsibilities

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Role	Responsibilities
Customer Service Representative	First point of contact; initial complaint logging; attempt first contact resolution; escalate complex issues
Customer Service Supervisor	Handle escalated complaints; review complex cases; authorize resolutions within authority limits
Dispute Resolution Specialist	Investigate formal disputes; analyze transaction records; prepare resolution recommendations
Compliance Officer	Oversee regulatory compliance; review high-risk complaints; handle regulatory inquiries; approve policy exceptions
Operations Manager	Manage complaint handling operations; review escalated cases; ensure SLA compliance
Executive Management	Review executive escalations; approve significant financial remedies; oversee policy development

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## 8. Record Keeping

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### 8.1 Documentation Requirements

ZeroLink Inc maintains comprehensive records of all complaints and disputes, including:

- Complaint registration details (date, time, channel, complainant information)
- Nature and description of the complaint
- All correspondence with the complainant
- Investigation notes and findings
- Resolution decision and rationale
- Any remedies or compensation provided
- Escalation history (if applicable)
- Customer feedback on resolution

### 8.2 Retention Periods

Record Type	Retention Period
Complaint records	5 years from resolution
Dispute records	7 years from resolution
Regulatory complaint reports	7 years
Complaint trend analysis	10 years

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### 8.3 Confidentiality

All complaint records are treated as confidential and are accessed only by authorized personnel with a legitimate business need.

## 9. Customer Communication

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### 9.1 Communication Principles

All communications with customers regarding complaints and disputes will be:

- **Clear:** Using plain language, avoiding jargon
- **Timely:** Within defined timeframes at each stage
- **Respectful:** Professional and courteous tone
- **Transparent:** Honest about findings and decisions
- **Complete:** Providing all relevant information

### 9.2 Final Response Content

Final responses to complaints include:

#### Required Elements of Final Response

- Summary of the complaint
- Findings of the investigation
- Resolution decision with clear explanation
- Any remedies or corrective actions
- Information about escalation options
- Contact details for follow-up questions
- Reference number for future correspondence

### 9.3 Language and Accessibility

ZeroLink Inc provides complaint handling services in English and Spanish. Translation services for other languages may be arranged upon request.

## 10. External Resolution Options

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If a customer remains dissatisfied after exhausting ZeroLink Inc's internal resolution process, external options may be available:

### 10.1 Regulatory Agencies

Agency	Jurisdiction	Contact
Consumer Financial Protection Bureau (CFPB)	Consumer complaints about financial products and services	<a href="http://www.consumerfinance.gov/complaint">www.consumerfinance.gov/complaint</a>
Colorado Division of Banking	State money transmission regulation	Colorado Department of Regulatory Agencies
FinCEN	AML/BSA compliance matters	<a href="http://www.fincen.gov">www.fincen.gov</a>
Better Business Bureau (BBB)	Business practice complaints	<a href="http://www.bbb.org">www.bbb.org</a>

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### 10.2 Legal Remedies

Customers retain the right to pursue legal remedies through the court system, subject to any arbitration provisions in their customer agreement.

**Important Notice**

ZeroLink Inc encourages customers to exhaust our internal complaint handling process before contacting external agencies or pursuing legal action. Many issues can be resolved quickly and satisfactorily through direct communication.

# 11. Training and Quality Assurance

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## 11.1 Staff Training

All staff involved in complaint handling receive comprehensive training:

Training Component	Frequency	Content
Complaint Handling Procedures	Initial + Annual	Process, documentation, communication
Customer Service Skills	Quarterly	Empathy, active listening, de-escalation
Regulatory Requirements	Annual	EFTA, state regulations, reporting
Product Knowledge	Ongoing	Services, fees, policies

## 11.2 Quality Assurance

Quality assurance measures include:

- Regular review of complaint handling by supervisors
- Customer satisfaction surveys following resolution
- Mystery shopping exercises
- Key performance indicator (KPI) monitoring
- Root cause analysis of recurring issues

## 12. Reporting and Analysis

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### 12.1 Internal Reporting

Report Type	Frequency	Audience
Complaint Volume Report	Weekly	Operations Management
SLA Performance Report	Monthly	Operations Management
Root Cause Analysis	Quarterly	Executive Management
Customer Satisfaction Report	Quarterly	Executive Management
Regulatory Complaint Report	As required	Compliance Officer / Regulators

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### 12.2 Trend Analysis

Complaint data is analyzed to identify:

- Emerging issues or patterns
- Systemic problems requiring process changes
- Training needs
- Product or service improvement opportunities

## 13. Policy Review

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This Dispute and Complaint Handling Policy is reviewed and updated regularly to ensure continued effectiveness and regulatory compliance:

<b>Review Type</b>	<b>Frequency</b>	<b>Responsible Party</b>
Operational Review	Quarterly	Operations Manager
Compliance Review	Annually	Compliance Officer
Comprehensive Policy Review	Annually	Compliance Officer / Executive Management
Independent Audit	Every 2 years	Internal/External Audit

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## 14. Contact Information

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### **ZeroLink Inc - Complaint and Dispute Contacts**

#### **General Complaints:**

Email: [complaints@zerolink.inc](mailto:complaints@zerolink.inc)

Phone: Customer Service Hotline

Hours: Monday-Friday, 9:00 AM - 6:00 PM MT

#### **Formal Disputes:**

Email: [disputes@zerolink.inc](mailto:disputes@zerolink.inc)

Mail: ZeroLink Inc, Attn: Dispute Resolution

6510 S Academy Blvd Ste A 642

Colorado Springs, CO 80906, USA

#### **Compliance Officer:**

Email: [compliance@zerolink.inc](mailto:compliance@zerolink.inc)

Attention: Shuai Wang, Compliance Officer

#### **Registered Address:**

6510 S Academy Blvd Ste A 642

Colorado Springs, CO 80906, USA

#### **Registration Information:**

MSB Registration: 31000322312273

EIN: 41-4203349

Colorado Entity ID: 20261174830

### **Policy Approval**

This Dispute and Complaint Handling Policy has been reviewed and approved by:

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Shuai Wang

Compliance Officer

ZeroLink Inc

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