

Customer Complaint/Grievance Handling Procedure

Version 1.3

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Intended Audience: Management Team

Overview	This is the official Customer Complaint Handling Procedure across Priority Technology Holdings, Inc., on behalf of itself and its subsidiaries (collectively, "Priority").
Objectives	<p>To deliver a consistent, high-quality and accountable response to complaints across Priority</p> <p>This quality procedure is in line with the overall Customer Service Strategy and industry best practice</p>
Services Covered	All services and products offered by Priority to its customers
Groups involved	All subsidiaries of Priority, including, without limitation Priority Commerce Canada, Inc.
Document Control	
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Policy

Priority Technology Holdings, Inc. (“Priority”) is committed to resolving customer complaints fairly, effectively, and efficiently. Priority’s complaint-handling procedures recognize the need to be equitable, objective and unbiased to both the complainant and the organization or personnel against whom the complaint is made.

All Priority personnel who may receive customer complaints are made aware of Priority’s complaints-handling procedures and of their roles, responsibilities and authority with respect to customer complaints. In connection with Priority’s merchant services in Canada, the staff will also be familiar with the complaint handling process required by the Code of Conduct for the Payment Card Industry in Canada (the “Code”) and the reporting requirements of the Financial Consumer Agency of Canada for complaints involving a violation of the Code.

Procedure Overview

As used in this Complaint Handling Procedure, a customer complaint is defined as an expression of dissatisfaction made to or about Priority, related to its products, services, staff or the handling of a complaint, by or on behalf of a customer (i.e., merchant, partner, ISO, etc.) where a response or resolution is explicitly or implicitly expected or legally required. Complaints can be made by customers directly to Priority and/or or through alternative pathways such as to governmental agencies or trade organizations. Customers can submit their complaints directly to Priority by contacting Priority’s customer service department through our website or phone number (833) 859-1016.

The following key steps must be followed with respect to customer complaints received by Priority’s staff.

1 Receive & Classify

Summary: Ensure that customer complaints are captured in writing and classified for action as appropriate.

Customer complaints should be captured in writing using Priority's internal systems. Each recorded complaint must be classified in one of the following classifications:

Priority 1 – Urgent: Complaints that have (or are likely to have) high business impact.

This classification should be reserved for significant, high impact issues, such as complaints with legal issues or issues likely to cause significant reputational damage or economic loss. This includes complaints from lawyers or complaints involving large accounts, risk of losing the customer, or influential customers who may make public statements against Priority.

Priority should respond to complaints in this classification within 3 business days of receiving the complaint, or sooner if legally required to do so.

Requires immediate escalation to a manager.

Priority 2 – Time Sensitive: Complaints with some economic impact or reputational risk.

This classification should be reserved for customer complaints that are not urgent, but nonetheless involve a reasonable level of economic impact or reputational risk. This may also include lower level complaints that recur repeatedly in a short span of time. An investigation at this stage aims to establish all the facts relevant to the points made in the complaint and to give the complainant a full, objective and proportionate response that represents our final position.

Priority should respond to complaints in this classification within 7 business days of receiving the complaint.

Priority 3 – Not Urgent: Complaints with little to no economic impact or reputational risk.

The expectation is that most customer complaints will fall in this classification. It involves individual customer concerns, general gripes, or little to no economic impact or reputational loss.

Discretion and flexibility should be exercised in prioritizing complaints in this classification

Code Violation – If any customer complaint is about Priority's merchant services provided in Canada, the Priority staff receiving the complaint will assess whether or not the complaint involves any alleged violation of the Code. If any Code violation is suspected, the staff member should clearly mark the complaint as a Code violation complaint.

The staff member logging the complaint should review the complaint and its priority with the department Manager before proceeding to the next step.

Managers will decide on the appropriate person(s) to carry out subsequent steps, including the investigation. If any complaint is suspected to involve a Code violation, the manager handling the complaint should properly document such complaint and follow the complaint handling process required by the Code and the reporting requirements of Financial Consumer Agency of Canada.

2 Acknowledge

Summary: Ensure that Priority acknowledges customer complaints promptly, including indicating when a formal response will follow and the person or department responsible for handling the complaint.

Customer complaints, regardless of priority level, should be acknowledged on the day of receipt.

This acknowledgement may be delivered by phone or email, as appropriate. It should advise the customer when to expect a response and from which department to expect the response.

3 Investigate

Summary: Ensure that complaints are investigated fully to understand the customer's issue and aid in the delivery of an appropriate response or resolution.

Investigate the complaint fully. All areas of interaction and communication should be established (who, what, where, when, why, etc.) and documented in sufficient detail. The person handling the complaint should reach out to any internal and external sources to understand fully the issues.

Contact with lawyers, judges, law enforcement or other legal personnel should be reserved for members of the Legal Department.

The priority level of the complaint will drive the timescale for completion (3 days for urgent or 2 weeks for non-urgent).

4 Resolve & Confirm

Summary: Ensure that the final resolution appropriate.

Review corporate guidelines and policies to develop a resolution that is appropriate and fair to the customer and Priority.

Where necessary, review proposed action with management and/or Legal. All priority level 3 customer complaints must be reviewed with senior management. The review should include recognition and documentation of any underlying issues that have contributed to the complaint and recommendations for actions to prevent further occurrence.

5 Respond to Customer

Summary: Provide the customer with the resolution within the timescales indicated.

The details of the findings and proposed resolution should be clearly explained (in written or verbal form as appropriate) to the customer within the agreed timescales. Investigation and addressing all complaints will be completed in no more than 20 business days. We will keep the

customer who submitted the complaint informed throughout the process. If we cannot resolve a complaint within 20 business days, we will inform the customer the reason for the delay and the expected response time.

6 Follow up

Summary: Ensure that complaints are followed up to confirm that customer's understanding of the resolution.

All priority level 1 complaints and 95% of priority level 2 and 3 complaints must be followed up within a reasonable timescale after the resolution of the issue. Follow up should be carried out by the Customer Relations team (unless the complaint involved a legal issue, in which case any follow up will be handled by the Legal Department).

The follow up should identify the following:

- Is the customer satisfied with the response?
- Did they feel that their complaint was properly and fairly handled?

Any negative responses to these questions should be referred to Operations Managers for action and direct follow up with customers.

QA & Close

Summary: Ensure that the organization as a whole is aware of complaints and any underlying issues. Plan actions to remove these and prevent future recurrence.

All customer complaints should be reviewed monthly as part of the service level agreements review meeting. Any customer complaints where action can be taken to avoid recurrent must be acted upon and raised with the appropriate managers/teams across the organization.

Complaint logging form/screen

Key Details required



Raised by	Priority staff member receiving and logging the complaint
Date	Date and time received
Complaint Code	Classification of complaint type TBD
Complaint Reference No.	System generated
Whether or not a Code violation	<input type="checkbox"/> Yes <input type="checkbox"/> No
Customer Name	Customer Name
DBA	Business Name
ID Number	Merchant ID number
Customer Contact number	Customer Contact number
Product or service referred to	Acquiring or Commercial
Description	Description of complaint – details
Business Impact	Description of impact on customers' business/operation



Priority	Complaint priority 1 – urgent 2- non-urgent
Acknowledgement	Date correspondence sent
Owner/assigned to	
Corrective action/resolution	Details of findings and proposed solution
Resolution confirmed by	Date and owner
Customer Contacted	Date and owner
Customer Followed up	Date and owner
Key Issues identified	



Long term actions required	
Issues and actions accepted – SAL/CSAT team	Date and owner