COMPLAINTS PROCEDURE FOR CLIENTS

Final Version: March 2025

[Public Document]

A. Introduction

Exclusive Markets Ltd (hereinafter, the "**Company**") has adopted this Complaints Procedure (hereinafter the "**Procedure**") to ensure a fair and quick process for handling complaints that may arise from our relationship.

The Company is an Investment Firm incorporated under the laws of Seychelles, with Company incorporation number 8423950-1, having its registered office at Suite 18, Third Floor, Vairam Building, Providence, Mahe, Seychelles. The company is a Securities Dealer licensed and regulated by the Seychelles Financial Services Authority (hereafter the "**FSA**") under licence number SD031.

B. Scope and Purpose of the Procedure

The Company has established the Procedure which provides information to Clients who wish to submit a Complaint to the Company. It also set a robust framework comprising of procedures, processes, controls, and monitoring. The Procedure sets the arrangement employed by the Company for the prompt submission and handling of Clients' or potential Clients' complaints.

C. Roles and Responsibilities

The Company's Board of Directors is responsible for the approval of this Procedure and any subsequent amendments thereon.

Responsibility of the Complaints Function

The Complaints unit has the responsibility to:

- ensure that the provisions stipulate in the Procedure are always followed.
- periodically evaluate the effectiveness of the Procedure and adopt any alternative or additional measures where necessary and appropriate.
- maintain and periodically review the list of Client's Complaints and ensure that feedback is provided to Clients in a timely manner, in line with the provisions of this Procedure.
- analyse Complaints and Complaints-handling data to ensure that any risks or issues are timely identified and addressed.
- monitor the operational effectiveness of the Complaints-handling process on an ongoing basis and consider Complaints as a source of relevant information in the context of the Company's general monitoring responsibilities.
- report to the Company's Board of Directors, on at least an annual basis, on the Complaints-handling reporting as well as remedies undertaken or to be undertaken.
- provide advice in relation to the implementation of this Procedure.
- make available the above information to the relevant Competent Authority, if requested.

D. Complaints Handling

The Company aims to provide the best possible service to its Clients or potential Clients. In this respect, the following principles have been adopted to ensure that Complaints received from Clients and / or potential Clients are handled promptly and in a reasonable manner.

E. Submitting the Complaint

To submit a complaint to the Company, we kindly request that you complete and submit the Company's official Complaint Form. You can access the form by clicking the button below. Once completed, please send it via email to complaints@exclusivemarkets.com or alternatively, you may submit it through the Company's client portal by following this specific path: My Profile -> KYC Verification -> and selecting the "Other" document type.

Download the Complaint form

Once you successfully submit your complaint, the responsible department of the Company shall handle and investigate your complaint.

Acknowledging Client's Complaint

We will acknowledge receipt of your complaint within two (2) business days from the receipt of your complaint and provide you the **unique reference number** of your complaint, expected resolutions timeframe and contact details of the signed person.

The unique reference number should be used in all your future contact with the Company and Seychelles FSA regarding the specific complaint.

Handling Client's Complaint

Once the Company acknowledges receipt of the complaint, will review it carefully, investigate the circumstances surrounding the complaint and will try to resolve it without undue delay. It shall make every effort to investigate the complaint and provide the Client with the outcome of its investigation within twenty-one (21) business days from the date the complaint was submitted.

During the investigation process the Company will update the Client of the handling process of the complaint. The designated officer of the Company may contact the Client directly (including communication by email or phone) to obtain, where needed, further clarifications and information relating to the complaint. The Company will require the full cooperation of the Client to expedite the investigation and possible resolution of the complaint.

If the complaint requires further investigation, and the Company cannot resolve it within twenty-one (21) business days, the Company will issue a holding response in writing or another durable medium. When a holding response is sent, it will indicate the causes of the delay and when the Company's investigation is likely to be completed. In any event, the Company shall provide the Client with the outcome of its investigation no later than ninety (90) business days from the date of receipt of the complaint.

The Company shall consider the Client's complaint as closed and cease the relevant investigation in case the Client fails to respond to the Company's officers within the period of ninety (90) days from the date of the Company providing a response. When the Company reaches an outcome, the Client will be informed together with an explanation of the Company's position and any remedy measures we intend to take (if applicable).

Final Decision

When the Company reaches an outcome, it will inform the Client of it together with an explanation of their position and any remedy measures they intend to take (if applicable).

If the Client is not satisfied with the Company's final decision or in the unlikely event that the Company was unable to provide the Client with a final response within the three (3) month time period specified above, the Client may submit the complaint to the Seychelles Financial Services Authority and seek mediation for possible compensation.

It is understood that the Client's right to take legal action remains unaffected by the existence or use of any complaint's procedures referred to above.

Contact Details of Seychelles Financial Services Authority:

Website: https://fsaseychelles.sc/complaint-handling
General email: *enquiries@fsaseychelles.sc*
Postal Address: *P.O. BOX 991, Bois de Rose Avenue, Roche Caiman Victoria Mahe Republic of Seychelles*
Telephone: *(+248) 438 08 00*
Fax: *(+248) 438 08 88*

F. Record Keeping Requirements

The Company shall keep records of each Complaint and the measures taken for the Complaint's resolution for a period of seven (7) years.

G. Monitoring of Complaints

The Company must analyse on an on-going basis the Complaints handling related data in order identify common issues arising from various types of Complaints, to identify systematic deficiencies, as well as to understand whether such root causes affect other processes or financial means, to initiate appropriate actions to make the Complaints redressal mechanisms more efficient and effective.

H. Creation/ Periodic Review/ Update of The Complaints Handling Procedure

The Company acknowledges its responsibility to establish, implement and maintain an effective written Complaints Handling Procedure. This Procedure is created, owned, and maintained by the Compliance Department, which is responsible for maintaining version series, original requests, and sup-porting documentation with all approvals of this Procedure. The Company's Procedure is assessed and periodically reviewed, at least on an annual basis, or more frequently, should the need arise. The Compliance Department will use all reasonable endeavors to ensure that the Procedure remains up-to-date and appropriate to the structure and size of the Company as well as the nature, scale, and complexity of the Company's activities. Any amendments to this Procedure shall be approved by the Company's Board of Directors.