



COMPLAINT HANDLING POLICY

AXSE BROKERAGE LTD

1.0 Introduction

This policy regulates effective, clear and fast handling of complaints submitted to the Company in relation to the performance and procedures of the Company.

The Company maintains Records of Complaints and measures taken for expedient complaint resolution, in line with applicable Laws, Rules and/or Regulations.

1.1 Definitions

a) Complaint:

- i. Complaints are defined as specific requests or claims related to the performance, services or products of the Company, which objects the performance or expresses negligence of The Company and lodges a relevant, specific and clear demand.
- ii. Asking an opinion or position about any specific case or requesting general information about the operation and services of The Company shall not constitute a complaint.

b) Complainant:

- i. The Complainant could be a natural or legal person, a company without legal entity or other organization that requires services of The Company or the addressee of information or offer related to the service.
- ii. When the complaint is submitted by a representative or other duly authorized person, The Company will investigate the legal basis of the submission, which must be presented by the Complainant in a format required by law. If no authorization is available, The Company will approach the Complainant directly in order to accelerate the procedure.

1.2 Submitting the complaint

The Complainant, if possible, should report the event or the date of the occasion subject of the complaint to The Company as soon as possible. This is necessary to enable the Company to investigate the complaint as efficiently as possible.

The following opportunities are available for submitting a complaint to our Company:

- by mail,
- by telephone,
- by e-mail,
- in writing, or
- verbally, both delivered personally.

Employees of the Customer Service shall receive and manage - first of all - complaints within the Company. Employees of the Customer Service shall help the Complainant in compiling and submitting the complaint. The Complainant must submit complaints related to services rendered on the basis of online trading agreement to the Customer Service of the Company. Contact of the Customer Service is available at the homepage of the Company all the time.

The telephone line of the Customer Service is available for submitting complaints by telephone. If the Complainant calls another telephone number of the Company to submit his/her complaint, he/she will be redirected to the Customer Service. If possible, the Company provides 24 hours direct telephone line to the Customer Service.

If you wish submitting your complaint personally, you can visit the head office of the Company in office hours (9:00 -16:00 hours on working days).

If you wish submitting your complaint in writing, please attach - if possible - copies of documents supporting your complaint to your application. The Company receives complaints submitted by e-mail on an ongoing basis.

1.3 Registration of complaints

The Company, until dealt with, shall register all complaints. This register shall record at least the following information:

- description of the complaint,
- description of the event or fact subject of the complaint,
- date of submitting the complaint,
- measures implemented to settle or solve the complaint,
- in case of rejection, the reasoning of the rejection,
- deadline of managing the complaint,
- name of the person responsible for the execution, - date of responding to the complaint.

The Company pays special attention to avoid collection of data about the complainant with the exception of recording data aimed to settle the complaint. All personal particulars obtained in relation of managing the complaint shall be deleted from records or made unsuitable for identification. The Company manages complaints within a transparent system; they could be traced and administered in each and every stage of the procedure. Unless settled on the spot, the Company records a written memorandum on all verbally submitted complaints. For this purpose the Company is entitled to use a complaint format or to register the complaint electronically. The Company hands over or mails one copy of the complaint to the Complainant.

The Company records all telephone conversations between the Customer Service and the Complainant and keeps the voice record for the period of one year. The Complainant shall be informed about this at the beginning of the conversation. The Company shall make this record available for listening and shall make the certified memorandum registered about this voice record available to the Complainant.

1.4 Managing complaints

The Company manages all complaints and Complainants equally, without any discrimination, in harmony with the procedure regulated by this Policy.

The Complaints are handled by:

a) Customer Service

If possible, all complaints must be settled without delay. If immediate settlement of a verbal complaint is not possible or the Complainants rejects the solution offered on the spot, an employee of the Company shall record the complaints and the Company's position in a memorandum and forwards them to Customer Service, unless the complaint was submitted directly to Customer Service. Similarly, Company employees forward all complaints submitted in writing to Customer Service.

Customer Service shall be responsible for settling complaints. The officers of the Customer Support Department will inform you of the appropriate process to follow.

If you are contacting us on behalf of another person, we may ask you to provide a proof of that person's consent to your handling of their Complaint. We aim to resolve the matter within five (5) business days.

b) Compliance Officer

If employees at Customer Services are unable to settle the complaint efficiently or within a short period of time, they forward the complaint to the Compliance officer of the

Company. The Complainant, if he/she does not accept the solution offered by Customer Service, is also entitled to approach the Compliance officer directly.

c) Directors of the Company

Within the organization of the Company, Directors of the Company represent the highest level of authority in deciding the settlement of complaints. Directors of the Company shall settle those complaints which cannot be managed within the above procedure; they shall take into account the opinion of the Compliance officer of the Company.

The employee of The Company who participated in the measure related to the complaint or made a decision subject of the complaint must not participate in making any decision related to the complaint. Such employee must provide every reasonable help to The Company in the procedure aimed to settle the complaint as soon as possible and in the interest of the Complainant.

1.5 Response to complaints

The Company follows the outlined procedures to ensure that your Complaint is resolved within a period of thirty (30) business days. This response, including the reasoning, is always mailed to the Complainant. Some Complaints can be resolved more quickly depending on the facts and the nature of the Complaint. If the Complaint is more complex and takes longer than thirty (30) business days to resolve, we will communicate the reasons for the delay.

Sometimes you are requested to supply additional information required for investigating the complaint.

In this case please respond at your earliest convenience.

When the complaint is submitted by another person or with a method unsuitable for establishing proper authorization of the submission, The Company may ask the person authorized to submit the complaint to confirm the complaint in question.

The Company adds a correct, clear and unanimous reasoning to every decision brought down in order to settle complaints, which are mailed to the Complainant in writing. If the decision refers to a legislation, not only the legislation, but its relevant regulations must also be included in the above reasoning. In parallel with informing the Complainant about the decision in question, the Company informs the Complainant about the opportunities of appeal and possible damage compensation.

1.6 Monitoring of complaints

After settling the procedure, the Company shall preserve every written or electronic documents related to complaints for a period of 7 years. The Company shall be entitled to prepare statistics and reports about complaints, which will be aimed to improve the efficiency of administering complaints.

1.7 Settlement of disputes

When disputes between the Company and the Complainant cannot be settled by the official procedure, regulations of chapter "Settlement of Disputes" of the Company Rules and Regulations shall be applicable. When the complaint is rejected, the Complainant may lodge an appeal at the Financial Services Authority Seychelles.