



Complaints Handling Policy

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Introduction

Errante Securities (Seychelles) Ltd (the “**Company**”), is a Securities Dealer Licensee regulated and authorized by the Financial Services Authority Seychelles (“**FSA**”) under license number SD038.

The Company is operating under the Securities Act and the Securities Regulations of the FSA as amended from time to time.

The Complaints Handling Policy (hereafter the “**Policy**”) provides 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.

Definitions

Business Days: are Monday to Friday, excluding bank or other holidays in Seychelles);

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. 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;

Complainant: could be a natural or legal person, or other organization that receives the services of the Company or the addressee of information or offer related to our services. 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.

Submitting a Complaint

The Complainant should report his/her Complaint to us in writing within three (3) Business Days from the occurrence of the event. This is necessary to enable the Company to investigate the complaint as efficiently as possible. Failure to submit a complaint within the above-mentioned period, it shall be deemed that the event has been rectified.

The Complainant should submit his/her official Complaint by contacting our compliance department at compliance@errante.com, along with the documentation or other material that may assist in the resolution of the complaint (including an initial written response to the allegations by the representative(s) involved).

In order to ensure that the Complaint is expedited fairly and efficiently please include in the below information:

- Account Number;
- Your name;
- Your contact details;
- Mobile phone;
- Email;
- Residential Address;
- Details of your complaint including date and time of the matter giving rise to the complaint, and the representatives involved (if any);
- Nature of the complaint;
- Remedies sought;

Upon a receipt of a formal complaint, we will provide you a written acknowledgement within six (6) Business Days of receiving your formal complaint. We will be confirming on our reply that we are taking the necessary actions to resolve your complaint with details of steps forward.

Our Compliance team will attempt to resolve your Complaint within twenty (20) Business Days after sending you the acknowledgement of your complaint.

Registration of Complaints

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

- i. description of the complaint;
- ii. description of the event or fact subject of the complaint;
- iii. date of submitting the complaint;
- iv. measures implemented to settle or solve the complaint;
- v. in case of rejection, the reasoning of the rejection;
- vi. deadline of managing the complaint;
- vii. name of the person responsible for the execution; and
- viii. date of responding to the complaint.

The Company pays special attention to avoid collection of data about the Complainant except for 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, and 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.

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.

Monitoring of Complaints

After settling the procedure, the Company shall preserve every written or electronic documents related to complaints for a period of five (5) years. The Company shall be entitled to prepare statistics and reports about complaints, which will be aimed to improve the efficiency of administering complaints.

Settlement of Disputes

When disputes between the Company and the Complainant cannot be settled following the above official procedure, regulations of chapter "Settlement of Disputes" of the Company's Rules and Regulations shall be applicable.

When a Complaint is rejected, the Complainant may lodge an appeal at the Financial Services Authority Seychelles (FSA).