

PXBT TRADING LTD

Complaints Handling Policy

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Table of acronyms

CO	Compliance Officer
FSA	Seychelles Financial Services Authority

Table of definitions and interpretations

“Board” means the Board of Directors of PXBT TRADING LTD;

“Business Relationship” shall have the meaning set out under Section 2 of the Anti-Money Act 2006;

“Companies Act” means the Companies Act 1972;

“Company” shall mean PXBT TRADING LTD which is formed and registered in the Republic of Seychelles under the Companies Act 1972;

“Complaints” mean (i) 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 and/or (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 and/or (iii) any expression of dissatisfaction or concern about a service or product provided by the Company, or the conduct of the Company in the performance of any regulated activities, where a response or resolution is explicitly expected, shall constitute a complaint;

“Complainant” means a natural or legal person, a company without legal entity or other organization who acquires or intends to acquire financial services or products from the Company or the addressee of information or offer related to the service;

“Customer” shall have the meaning set out under Section 2 of the Anti-Money Laundering Act 2006;

“Employee” means a person employed by PXBT TRADING LTD at non-executive level;

“Person” includes a natural person and a legal person;

“Policy” means PXBT TRADING LTD’s Complaint Handling Policy;

“Republic” means the Republic of Seychelles;

“Website” shall mean the Company’s Website i.e <https://pxbt.com/>, or any and all websites that the Company may operate through from time to time.

Words importing one gender include all other genders and words importing the singular include the plural and vice versa.

1. Introduction

1.1. **PXBT TRADING LTD** (the “Company”) is a Securities Dealer Licensee, regulated and authorized by the Seychelles Financial Services Authority under the license number **SD162**, with registered address at **Providence Complex, First Floor, Office B11, Providence, Mahe, Seychelles**.

1.2. The Company is required to establish, implement and maintain an effective and transparent complaint handling policy and procedure for the prompt handling of Customers’ complaints.

1.3. In this respect, the Company has established this Complaints Handling Policy (the “Policy”) that sets out the process adopted by the Company for the fair and prompt handling of queries, complaints and disputes received from the Company’s Customers, as well as a robust framework comprising of, procedures, processes, controls and monitoring processes, to ensure the prompt handling of Customers’ complaints. This Policy describes, amongst others, the process that Customers will need to follow in order to submit a query and/or complaint to the Company.

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

1.5. The Company’s procedures and policies should be reviewed on a yearly basis or as the need arises, in order to ensure that the Complaints Handling Process remains efficient and effective. Any necessary changes to the procedures should be reflected in this Complaint Handling Policy, which is available on the Website for reference.

2. Complaint Handling Process

2.1. The Company offers complaint handling services which are accessible, independent, fair, accountable, timely and efficient. Complainants shall be able to file complaints and receive the above services for complaints free of charge.

2.2. The Company is mandated to carry out a root cause analysis on complaints received, so that larger issues may be identified and addressed, as well as, actions are taken to rectify the issue.

2.3. The Company ensures that the Complaint Handling Process remains transparent, and that complaints handling staff declares any conflict of interest that arises pertaining to complaints received. In these cases, where possible, another employee should be appointed to handle the case. In cases where the employee with the conflict of interest is the only one available to handle the complaint, or has to eventually approve decisions made in relation to the complaint, the employee may still handle the matter as long as the conflict of interest is properly declared.

2.4. As part of the complaints handling procedures, the topic of confidentiality should be addressed, where it is made clear that confidentiality around complaints received from customers or persons acting on behalf of customers should be maintained at all times.

3. Applicable Procedure for Submission of Queries and Complaints

3.1. Submitting a Query

3.1.1. If the Customer has any query regarding his account, or he is dissatisfied with the Company's services, in the first instance, the Customer should contact the Company's Customer Support Department via e-mail at help@pxbt.com, live chat, telephone or any other official method of communication made available by the Company, as the vast majority of queries and issues can be dealt with at this level.

3.1.2. The Company's Customer Support Department will try to resolve the Customer's query immediately. If the Customer's query cannot be resolved immediately, the Company remains committed to addressing and resolving it in a prompt manner (usually within 3 business

days). If additional time is required, we will issue a holding response in writing, acknowledging receipt of the inquiry and we will indicate when we will make further contact to inform you of the investigation process and outcome.

3.1.3. If you are not satisfied with the final response received by the Customer Support Department, then you may raise this further, following the procedure described in Section 3.2. below 'Submitting a Complaint'.

3.2. Submitting a Complaint

3.2.1. Further to the above, any Customer who is not satisfied with the final response received by the Customer Support Department and would like to raise a query further, may submit a complaint electronically and in writing to the dedicated email of the Compliance Department at compliance@pxbt.com

3.2.2. 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.

3.2.3. The Company may accept complaints brought by third parties acting on behalf of a Complainant (Authorised Representatives), as long as the Complainant authorised in writing the third party and provided this authorisation as evidence to the Company via his/her registered email. 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.

When a complaint is submitted by a representative, the Company will require the following information:

- i. Identification of both the person lodging the complaint on behalf of the Complainant and the Complainant him/herself. It is in the Company's discretion to request due diligence documentation and/or information on both

the representative and the Complainant, as per the internal AML policies and procedures of the Company.

- ii. The relationship between the representative and the Complainant.
- iii. The reason that the Complainant cannot lodge the complaint themselves.
- iv. An authorization letter and/or official document signed by the Complainant that authorizes the representative to file a complaint on behalf of the latter.

3.2.4. The Complainant shall forward to the Company a completed and signed Complaint Form, as indicated in “**Appendix 1**” of this Policy. The Complaint Form submitted should include truthful, complete and accurate information. The Complainant can also use supporting documentation to accompany his/her Complaint. The information required through the Complaint submitted is indicative and additional information and/or clarification and/or evidence might be requested, for the Company to be able to handle / tackle the Complaint promptly and efficiently.

If the Complainant encounters difficulties submitting the Complaint Form through the official procedure outlined in this Policy, they may inform the Company using an alternative method, such as email or telephone as depicted in the relevant section of the Website. The Company will then assist the client in addressing their complaint.

3.2.5. Upon receipt of the complaint, it will be assigned to the Compliance department, which is responsible for handling complaints.

3.3. [Acknowledging your Complaint](#)

3.3.1. Upon the successful submission of the Complaint, the Company will acknowledge receipt of complaints within five (5) working days from the receipt of the complaint and provide a unique reference number to the complainant.

3.3.2. As part of the acknowledgement, complainants will be advised on the timeframe for receiving a response. The acknowledgement of complaints shall be on paper or on another durable medium with the ability to be stored, including digital means.

3.3.3. The unique reference number should be used in all future contact with the Company. The unique reference number allows complainants to follow up on the status of their complaint at any point.

3.3.4. Following acknowledgement, the Company will carry out an impartial review of the matter and communicate to the Complainant the outcome of the Company's investigation and propose remedial actions (if applicable).

3.3.5. In the unlikely event that the Company is unable to respond within the specified timeframe, the Company will inform the Complainant of the reasons for the delay and indicate the period of time within which it is possible to complete the investigation. In any event, we shall provide the Complainant with the outcome of the Company's investigation no later than forty-five (45) working days from the date of the Company's acknowledgment, depending on the complexity of the case and your cooperation.

3.4. [Additional Information on Queries and Complaints](#)

3.4.1. The Company may require at any given time during the examination and handling of queries and complaints from the Complainant to provide additional information, clarifications and/or documentation and the Complainant's full cooperation in order for the Company's investigation to be concluded.

3.4.2. The Company may decide to extend the investigation timeframe, or put the matter on hold, or consider the matter as closed if the Complainant fails to respond adequately and/or within a reasonable timeframe or within the designated time frame.

3.4.3. We encourage the Complainant to lodge his / her query and/or complaint within a reasonable time from the moment the matter occurs. The Complainant, if possible, should report the event or the date of the occasion and the 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.

3.4.4. The Company is entitled to treat a Query or Complaint as closed in the following circumstances, among others:

- a) where it is determined that no further action is required by the Complainant and/or the Company, upon the issuance of the final decision by the Company, and/or

- b) where the matter has been mutually resolved, and/or
- c) where the Complainant has failed to respond promptly and adequately to the questions and requests of the Company, and/or
- d) where the Company has given a substantive response and the Complainant has failed to indicate that the response is unsatisfactory and/or substantiate the claim with relevant data, within a reasonable timeframe.

3.4.5. The Company shall notify the Complainant upon the closure of a query or complaint.

4. Response to Complaints

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

4.2. The Company follows the outlined procedures to ensure that the Complainant's complaint is resolved within a period of a maximum of forty-five (45) working days, as already mentioned in paragraph 3.3.5. above. This response, including the reasoning, is always sent in writing to the Complainant to his/her provided email address. Some Complaints can be resolved more quickly depending on the facts and the nature of the Complaint.

4.3. If the Complaint is more complex and takes longer than forty-five (45) working days to resolve, the Company will communicate the reasons for the delay. Sometimes the Complainant is requested to supply additional information required for investigating the Complaint.

4.4. The Company adds adequate, clear and unanimous reasoning to every decision brought down in order to settle complaints, which shall be emailed to the Complainant in writing. If the decision refers to a legislation, not only the legislation, but also relevant regulations must also be included in the above reasoning (if applicable).

5. Settlement of Disputes

5.1. When disputes between the Company and the Complainant cannot be settled by the official Company procedure described herein, the Complainant may source alternative routes to lodge his/her Complaint.

5.2. If further to the investigation conducted by the Company, the complaint of the Complainant is rejected by the Company and/or is not resolved, the Complainant may lodge an appeal to the FSA, in order for the required enforcement actions to be taken.

5.3. More information for the Complainant is accessible via the FSA website <https://fsaseychelles.sc/complaint-handling> and also below:

Financial Services Authority (FSA): It is mandatory for complainants to fill in the Complaints Handling Form before any complaint is investigated by the Financial Services Authority. All the information indicated on the form must be provided. The Complaint Handling Form, which is available on the FSA website can be submitted by any of the following ways:	
1. Email address:	complaints@fsaseychelles.sc
2. Formal letter addressed to:	The Chief Executive Officer Policy (Information & Communication Unit) Financial Services Authority Bois De Rose Avenue P.O Box 991, Victoria Mahé, Seychelles
3. Hand-delivered directly to the Authority:	Bois De Rose Avenue, P.O. Box 991, Victoria, Mahe, Seychelles
Link to Complaints Handling Form	https://fsaseychelles.sc/other-fsdocuments/complaint-form/download

Appendix 1: COMPLAINT FORM

PXBT TRADING LTD - Complaint Form

A. CLIENT INFORMATION

NAME:	ACCOUNT NUMBER:
ADDRESS:	TELEPHONE NUMBER:

B. DETAILS OF THE REPRESENTATIVE LODGING THE COMPLAINT ON BEHALF OF THE COMPLAINANT *(IF APPLICABLE)*.

FULL NAME:	
HOME/ BUSINESS ADDRESS:	CONTACT DETAILS TELEPHONE NUMBER: EMAIL ADDRESS:
RELATIONSHIP TO THE COMPLAINANT:	
REASON FOR LODGING THE COMPLAINT ON BEHALF OF THE COMPLAINANT:	

C. BRIEF SUMMARY OF THE COMPLAINT

Please describe the product or service you are complaining about (description, evidence, amount and suggested way to be solved):

Please enclose relevant documentation that may help the Company to handle this complaint. The documentation to be provided by the Customer are the Customer’s statement, correspondence with the Company and any other supporting documentation to be requested by the Compliance Officer which is relevant to the Customer’s complaint.

DATE AND PLACE

CLIENT’S SIGNATURE

FOR INTERNAL USE ONLY:

Complaint Reference number:	
Date of Complaint Received:	
Means of communication by which the complaint was lodged:	
Type of the Complaint:	
Employee and Department that received the Complaint:	
Officer/Department Handling the Complaint:	
Acknowledgment Sent to Client:	YES, NO and date
Informed Client of Initial Action:	YES, NO and date
Final Response Provided to Client:	YES, NO and date
In summary, the content of the Company's response to the Complaint:	
Status of Complaint:	

Holding Response Provided to Client:	YES, NO, N/A
<hr/> Signature of Compliance Officer	DATE: