EQUITI BROKERAGE (SEYCHELLES) LIMITED

Complaints Handling Policy

2026

Version 2.1
Prepared for Board approval and adoption
Policy owner Compliance Officer
Effective date as of February 2025

1 Introduction

Equiti Brokerage (Seychelles) Limited is committed to reviewing client complaints fairly, promptly and transparently. This policy explains the complaints we handle, the steps we follow, the responsibilities of our staff and the rights of clients who remain dissatisfied. The forms and templates in the appendices support day-to-day implementation.

Purpose: To provide a clear and accountable process for receiving, investigating, answering and learning from complaints, supported by complete records and evidence.

Scope: This policy applies to directors, employees, agents, representatives and service providers acting for Equiti, including related companies providing outsourced Support. It covers current and former clients and representatives acting with their consent.

The Financial Consumer Protection (Complaint Handling) Regulations, 2024, SI 110 of 2024, effective 1 January 2025, govern Equiti's complaint handling obligations. The Financial Consumer Protection Act, 2022 also applies. The FSA's Complaints Handling Guidelines, version 15 September 2025, explain submission and assessment of complaints at the Authority. Equiti will not treat the Authority's own investigation timetable as Equiti's response deadline.

Binding legislation and applicable regulatory directions prevail over inconsistent internal procedures or contractual provisions. Compliance will apply any binding shorter deadline. Internal targets in this policy are operating standards adopted by Equiti, rather than separate statutory deadlines.

2 Definition of a Complaint

This policy covers dissatisfaction concerning Equiti's products, services or conduct where a response or resolution is expected. It applies to current and former clients and complaints received directly or through a representative, introducer, related company or outsourced function acting for Equiti. Account opening date does not determine which complaint handling rules apply.

The Complaints Handling Unit is the function led by Compliance, supported by designated staff. The Complaints Handling Officer is the Compliance Officer unless the Board appoints another suitable officer in writing. A final response states Equiti's considered determination and available remedies. A final response does not establish that the client accepts the outcome or that a payment has been completed.

For operational scheduling, business days are working days in Seychelles, excluding weekends and Seychelles public holidays. Compliance maintains the calendar and records the actual receipt timestamp and time zone. A conservative calculation must ensure Equiti meets the applicable legal deadline; any uncertainty must be escalated and must not extend the client's waiting period.

3 Principles

- Fairness and independence: Assess each concern objectively, consider both sides and manage conflicts of interest.
- Transparency: Explain the process, progress, findings and reasons in plain language, with enough detail to understand the decision.
- Accessibility: Provide a free service, practical help and reasonable adjustments. No special form is required.
- Confidentiality: Protect personal and properly confidential information while allowing lawful regulatory access and appropriate explanations to clients.

- Timeliness: Monitor the original receipt date, meet applicable deadlines and keep clients informed.
- Accountability: Record the investigation, decision, approvals and remedy; identify and correct recurring problems.
- Protection from adverse treatment: Do not penalise a client for complaining or approaching the FSA.

4 Types of Complaints

Equiti accepts complaints about its products, services or conduct, including the categories below. This list guides classification and does not restrict a client's ability to complain. References to products or activities do not expand Equiti's regulatory permissions.

4 1 Execution of Orders

- Delayed, incorrect or rejected orders; activation or execution pricing; slippage and stop-level changes; disputes about trading conduct or execution decisions.

4 2 Account Management

- Onboarding and client assessments; account details and statements; access restrictions, suspension or closure; disputed balances and financial adjustments.

4 3 Information and Disclosures

- Accuracy and clarity of product information, risks, fees, commissions, spreads, margin and platform functionality; contractual terms and amendment notices.

4 4 Customer Service

- Unanswered enquiries, unclear responses, delays, staff conduct, outsourced Support and the handling of an earlier complaint.

4 5 Fees Payments and Financial Adjustments

- Charges, commissions and swaps; deposits and withdrawals; debit adjustments, profit reversals, withholding, set-off and payment reconciliation.

4 6 Technical Issues

- Platform availability, order processing, transaction errors and system or connectivity failures.

4 7 Regulatory Compliance and Privacy

- AML and KYC procedures, client information handling, privacy, confidentiality and alleged regulatory or conduct failures.

5 Complaint Handling Process

5 1 Timeframes and Monitoring

Action	Maximum or internal target	Control
Written acknowledgement	Aim within 1 business day — Equiti target. No later than 2 business days — regulatory maximum.	Provide reference, designated contact and expected response date.
Complaint response	As soon as possible and within 21 business days of lodging — regulatory requirement	Prepare a considered determination; a holding message alone does not satisfy the ordinary deadline.
Grossly complicated complaint	Up to 90 business days in total from lodging — permitted regulatory extension	Written reason and revised response date; apply section 5 1 before the ordinary deadline.
Information requested by FSA	Within 1 business day of receipt — regulatory requirement	Officer coordinates immediate production and escalates missing records.
Progress updates	At least every seven business days while unresolved — Equiti target	Explain progress, outstanding work and next expected communication.
Internal monitoring	Daily deadline review; management checkpoints by days 10, 15 and 18 — Equiti control	Escalate evidence gaps early enough to meet the response deadline.
Agreed redress	Normally within 10 business days after acceptance — Equiti target	Confirm the actual implementation date or explain an agreed alternative.

Compliance records the calculation and actual dispatch evidence. Internal calendars must not rely on the client's country holidays. Missing client information, staff absence, outsourcing delays or an internal appeal do not automatically suspend or reset a deadline. Seek information promptly, explain its relevance and continue work using available evidence.

If a deadline is at risk, the Officer alerts senior management immediately. An overdue complaint requires an honest written update, a realistic response date, documented cause and corrective action. An expired deadline cannot be cured by backdating an acknowledgement or extension. Compliance assesses any separate reporting or notification obligation.

5 .1.1 Grossly Complicated Complaints

Only a grossly complicated complaint qualifies for the extension allowed by regulation 9. The Officer must explain the specific complexity, work already completed, additional investigation required and why a determination cannot reasonably be reached within 21 business days. Routine workload, approval delays or the absence of records alone must not be treated as sufficient justification.

An unconflicted senior manager approves the reasoned extension and revised date. Equiti sends written notice before the ordinary deadline as an internal control. The notice gives a clear reason, an exact revised date no later than 90 business days from original lodging, the designated contact and planned updates. Ninety business days is a total maximum under this extension, not 90 additional days.

The Officer continues active investigation and reviews progress at least every seven business days. Equiti must not suggest that an extension guarantees the FSA will refuse to consider the complaint. The Authority determines its own admissibility and process. If the revised deadline is at risk, escalate immediately and seek regulatory guidance where appropriate; do not assume a further extension is available.

5.2 Step 1 Receipt and Acknowledgement

The receiving employee must preserve the original communication and its receipt time, record the concern and alert the Complaints Handling Officer on the same business day. If received outside working hours, staff act at the start of the next business day while preserving the original timestamp. Equiti's first receipt, including receipt by its authorised outsourced Support, determines the complaint date. Referral between teams does not restart the clock.

- Allocate one complaint reference and link all Support, closure, portal and Compliance case numbers to it. Record the client profile number separately from trading account numbers.
- Record each issue, the remedy sought, language preference, incident dates and known accessibility needs. Ask only for information necessary to investigate.
- Calculate acknowledgement and response dates immediately, assign an owner and independent reviewer, and set diary alerts.
- Preserve relevant records against deletion or routine log rotation. Identify any account access or payment risk requiring urgent action.
- Investigate on the day of receipt where feasible. A same-day solution must still be recorded, communicated and supported by evidence.

Duplicates are linked to the original case without losing the original date. Additional evidence on the same issue is added to the case. A genuinely new issue may receive a linked reference and its own receipt date, but must not be used to delay the existing complaint. Anonymous or incomplete concerns should be recorded and assessed for risk; lack of identity may limit an individual remedy but does not justify ignoring evidence of a wider problem.

The acknowledgement must identify the complaint reference and designated person with contact details, summarise the issues understood, state when a response is expected and invite correction or relevant evidence. Use a named contact when available and provide a monitored team mailbox and backup. Record delivery failures and promptly use another appropriate channel. Appendix D contains a template.

A request for further information must not make acknowledgement conditional on receiving it. A client who has already complained to Support must receive a coordinated acknowledgement referencing the first receipt date, rather than a new deadline beginning with Compliance referral.

Equiti aims to acknowledge complaints within one business day as an internal service target. The statutory maximum remains two business days. Supply a copy of, or direct access to, this policy with the acknowledgement.

5.3 Step 2 Investigation

5.3.1 Investigation plan

The Officer prepares a proportionate plan identifying each issue, relevant period, required evidence, responsible departments, applicable contract and legal requirements, disputed facts and target dates. The review considers evidence supporting both the client's position and Equiti's position. The client must have a fair opportunity to clarify the complaint and comment on material factual discrepancies.

Requests to departments must specify the required material and internal return date. The Officer follows up missing material and records searches undertaken. Where an important record is unavailable, the investigation and final response must acknowledge the limitation. Conclusions must not present assumptions as established facts.

5.3. 2 Trading and financial complaints

- Identify the affected trading accounts, orders, deals, instruments, dates and time zones. Obtain complete relevant histories, server audit records, order modification logs and pricing records where relied upon. Retain underlying records rather than only cropped screenshots.
- Explain the alleged conduct and mechanism in plain language. Short holding periods, hosting providers, IP locations or automated trading must be connected to the affected trades before being relied upon.
- Confirm the operative contract version, acceptance, amendments, notice and effective dates. Identify the specific obligation allegedly breached, the evidence of breach and the remedy authorised by that contract and applicable law.
- For an adjustment or withholding, produce a reproducible calculation showing the affected trades or defined categories, period, profit, loss, commissions, swaps and treatment of deposits and withdrawals. Finance and the technical team must validate the amount.
- Distinguish trade reversal, temporary withholding, set-off and account closure. Reconcile account balances, wallet transfers and withdrawals, with payment evidence. A ledger debit proves an entry, not the contractual justification; an internal transfer does not prove payment to the client.
- Record who approved the original decision and what evidence existed at that time. Mark later analysis by its actual preparation date. A subsequent report must not be described as the basis of an earlier decision unless it was available then.

5.3.3 Findings and review

The investigation file must connect each finding to a specific record, identify any contradictory evidence and explain why the proposed outcome follows. The reviewer checks the completeness of the correspondence, factual accuracy, contract applicability, calculations, consistency with comparable cases and adequacy of the proposed remedy. Any unresolved difference between reviewers goes to an unconflicted senior manager.

Suspected fraud, financial crime or a security issue must also be referred through the appropriate specialist process. Such referral does not automatically remove the complaint from this policy. Compliance and the MLRO must determine any lawful disclosure restrictions, including tipping-off restrictions, without using generic confidentiality wording to avoid explaining matters that can properly be disclosed.

5.4 Step 3 Determination and Resolution

The final response must be factual, respectful and understandable. It must address every material issue, including whether Equiti upholds, partly upholds or does not uphold it, and explain the reasons and supporting evidence. Technical conclusions must be confirmed by the relevant specialist and expressed in language the client can follow.

- Include an overview of the complaint and the issues considered in the investigation.
- Explain the outcome, the material facts and the applicable contractual or regulatory basis. Disclose enough detail to explain affected trades and calculations where relevant.
- Identify each remedy, its calculation, implementation arrangements and the period for accepting or declining it. Equiti normally allows 20 business days to respond to a proposed remedy and considers reasonable requests for more time; this is an internal standard.
- Explain that the client may approach the FSA if dissatisfied, and provide the Authority's telephone, email and postal address.
- Use English, French or Creole as requested, and include the case reference, designated contact, date and approved signatory.

Equiti may protect third-party data, legally privileged information and lawfully confidential technical material. Each withholding or redaction must have a recorded reason and be assessed by Compliance. Provide an appropriate factual explanation or alternative disclosure where possible. A blanket confidentiality statement must not replace reasons for an adverse decision.

The Officer completes the approval checklist in Appendix D before dispatch and retains the final approved version and sending evidence. Sending a final response changes the status to "Final response issued"; it must not automatically be recorded as "Resolved" if the client remains dissatisfied or redress is outstanding.

Remedies may include correction of an error, refund, reversal of an unjustified charge or adjustment, payment of approved compensation, an explanation, an apology or an operational improvement. The decision must reflect the evidence and applicable obligations. Similar cases should be considered consistently, with any difference explained.

Finance receives written approval and checks beneficiary details through appropriate security controls. The Officer records the accepted remedy, implementation date, transaction references and payment confirmation. Where receipt remains uncertain, investigate and communicate the position. An administrative closure must not conceal an uncompleted payment.

Silence does not constitute acceptance of a disputed finding or settlement. If the client does not respond within the offered period, follow up and record the position accurately. A complaint may be closed administratively with the outcome and client acceptance status clearly recorded, while preserving external rights and outstanding tasks.

If a client withdraws a complaint, retain the request and consider whether a systemic, conduct or regulatory issue still requires investigation. An FSA complaint must be withdrawn through the Authority's process; Equiti must not assume its own settlement ends the Authority's work.

5.5 Step 4 Further Review and Escalation

A dissatisfied client may request an internal review by an unconflicted senior manager. This additional review is optional and must not become a mandatory barrier to FSA referral or restart the original complaint clock. Equiti normally acknowledges such a request within two business days and aims to answer within 10 business days, advising the client if further work is required.

The FSA Guidelines direct clients to complain first to the licensee and allow the stated acknowledgement and determination periods before escalation. Equiti's client information will explain this and direct clients to the FSA's official Complaint Form and submission instructions. The client should retain the original complaint, Equiti's responses and supporting records. The FSA assesses whether a complaint falls within its scope and meets its requirements.

Financial Services Authority, Bois De Rose Avenue, P.O. Box 991, Victoria, Mahé, Seychelles. Telephone: +248 4380800. Email: complaints@fsaseychelles.sc. Website: https://fsaseychelles.sc. Compliance verifies these details whenever the policy is reviewed and before publishing a material contact change.

Equiti will cooperate with the FSA and provide a clear chronology, complete relevant records, evidence supporting its determination and accurate information about any unresolved remedy. It will not promise an outcome or completion date on the Authority's behalf. Any appeal against an FSA decision is governed by the applicable legislation and the decision notice; clients may seek independent advice.

A complaint alleging misconduct or a regulatory breach must be escalated promptly to Compliance and senior management. Compliance must assess the facts against the applicable notification requirements and report to the FSA where required, documenting the basis and deadline. An allegation, an unresolved complaint or a missed internal target does not by itself establish a universal statutory reporting obligation. FSA directions and any separately applicable notification duties remain binding.

5.6 Step 5 Record Keeping

The Officer maintains one controlled complaints register and a linked case file. Appendix B defines the required fields. Every material communication, investigation step, approval, extension and payment must be traceable. Record factual updates with their actual date and author; preserve earlier entries and the audit trail.

Case files include original emails with sender and recipient details, attachments, chat and portal messages, available call records or contemporaneous notes, contracts and amendment evidence, technical and financial records, investigation reports, approvals and final responses. References must allow the source record to be retrieved. Access is restricted to authorised personnel and records are securely backed up.

Under section 11 of the Financial Consumer Protection Act, physical transaction and correspondence records must be retained for at least seven years from the last transaction with the client. Equiti will preserve the required physical records and apply an internal minimum of seven years to complaint files in every format from the later of the last client transaction or complaint closure. Longer applicable requirements and legal or regulatory holds take priority. Digital storage alone must not be assumed to replace a statutory physical-record requirement without a confirmed lawful basis.

On receipt of an FSA request for complaint-related information, immediately notify Compliance and senior management, preserve records and activate a same-day collection plan. Regulation 11 requires provision within one business day. Deliver the complete available responsive record securely within that period.

Escalate any missing item immediately, explain the gap and recovery steps to the FSA and request directions; partial delivery does not by itself satisfy a requirement for all information. Do not assume a longer date in correspondence displaces this requirement without clarification.

6 Roles and Responsibilities

Role	Responsibility and authority
Board	Approve this policy, appoint adequate resources and a substitute officer, oversee serious and recurring issues, and review quarterly reporting.
Senior management	Provide access to records and staff, secure prompt departmental responses, approve redress and exceptional extensions, and escalate breaches to the Board.
Complaints Handling Officer	Own the register, deadlines, investigation and final response. Require information from all functions and providers. Issue acknowledgements and progress updates; approve routine nonfinancial determinations subject to independent review.
Independent reviewer	Review evidence, reasoning, calculations and fairness before a final response. Must not be the sole author of the original disputed decision.
Support and receiving staff	Recognise complaints, preserve original communications, register receipt and refer promptly. Do not require the client to resubmit or wait five days.
Technical and dealing teams	Supply complete relevant trading and pricing evidence, explain findings in plain language, identify limitations, and distinguish contemporaneous evidence from later analysis.
Finance	Reconcile disputed amounts and payments, validate calculations, implement approved redress, and provide completion evidence.
Outsourced service providers	Follow this policy and agreed service standards, preserve records, disclose conflicts and provide immediate access to Equiti.
Compliance substitute	Perform the Officer's duties during absence or conflict, with the same access and authority under the Board's written appointment.

Financial redress, disputed withholding, account closure determinations and decisions presenting material regulatory or litigation risk require approval by an authorised senior manager or director independent of the disputed decision. Board approval is required where the existing financial delegation is exceeded or the approving director is conflicted. Until a separate financial delegation is approved, a director approves every financial remedy. Approval delays do not change regulatory deadlines.

The Officer records conflicts at allocation and before determination. An employee involved in the disputed action may provide evidence but cannot be the only decision maker on the complaint. Complaints involving the Officer go to an unconflicted director; complaints involving that director go to another unconflicted director or Board-appointed independent reviewer.

6.1 Securities Dealer Representative and Support

The Securities Dealer Representative and Support staff receive and record dissatisfaction, explain the complaints process, preserve original records and immediately refer the complaint to Compliance. They provide relevant facts and facilitate communication. They must not promise an outcome, adjudicate a disputed complaint independently or require the client to repeat it through another channel. Where involved in the disputed conduct, they act as evidence providers rather than the independent reviewer.

6.2 Compliance Officer

The Compliance Officer leads the Complaints Handling Unit, allocates cases, maintains the register and deadlines, directs investigation, assesses the applicable contract and regulatory requirements, and coordinates a reasoned final response. The Officer has direct access to senior management and the Board and authority to request records from every relevant department and provider.

6.3 Senior Management and Board

Senior management secures resources and departmental cooperation, approves matters within delegated authority and ensures remedies and corrective actions are implemented. The Board approves the policy, ensures independent cover and reviews material findings and recurring failures. Decisions involving a conflicted person must be reassigned in accordance with the controls above.

6.4 Independence and Cooperation

Compliance and the independent reviewer must exercise judgement independently of the business unit or revenue interests connected with the complaint. Support, dealing, technical and Finance staff must cooperate and supply complete evidence. Independence does not prevent specialist input; it requires objective oversight and an unconflicted determination.

6.5 Outsourcing

Equiti remains accountable where a related company or external provider handles Support, investigation or complaint administration. Written arrangements must require prompt recognition and referral, original receipt timestamps, access to complete records, compliance with this policy, trained staff, conflicts management, confidentiality, evidence preservation and cooperation with the FSA.

The Officer reviews the provider's open cases and deadlines at least weekly and performs monthly checks of receipt dates, referrals, acknowledgements, records and outcomes. Exceptions are reported to senior management. Equiti must be able to retrieve records directly; reliance on a provider's summary is insufficient where the underlying evidence is needed.

Complaint data is used only for legitimate handling, governance, regulatory and legal purposes. Sensitive information is transmitted securely and only to authorised recipients. Staff must verify representative authority before disclosure and retain an audit trail of regulator disclosures. Confidentiality must be maintained without obstructing lawful regulatory access.

7 Client Rights

Clients may complain by email to support.sey@equiti.com, by telephone, in person, through Equiti's website or available client portal and chat facilities, or in writing to the office shown in Equiti's published contact details. Every receiving employee must accept and route a complaint. Clients may contact Compliance directly without first completing a Support stage.

Equiti will assist clients who need help describing a complaint. It will accept oral complaints, record them accurately and seek confirmation of the summary where practicable. Recording and investigation must not be delayed while waiting for confirmation. No fee, compulsory legal representation, notarisation or unnecessary formality may be imposed.

Equiti will accommodate reasonable accessibility needs and vulnerability, including illness, disability, limited literacy or language barriers. Final written communications will be provided in English, French or Creole as requested. Staff will arrange assistance or translation without charging the complainant. A language preference must be recorded at receipt.

A representative must have the client's written consent before receiving confidential account information or acting for the client. Staff may record the concern and preserve evidence while consent is obtained. Identity checks must be proportionate and must not become a barrier to lodging a complaint.

No client may be penalised, disadvantaged or discriminated against for complaining or approaching the FSA. Any necessary trading restriction or account action must have a separate documented lawful basis, receive appropriate approval and remain subject to objective review. Staff may manage threatening conduct proportionately while continuing to address the substance of the complaint.

Clients have the right to information about progress and findings, an understandable response, a fair consideration of evidence and an explanation of available escalation routes. They may ask for assistance, communicate through an authorised representative and request the final written response in English, French or Creole. An optional internal review is not an additional mandatory barrier to approaching the FSA.

8 Continuous Improvement

8.1 Reporting and Corrective Action

The Officer reports monthly to senior management and quarterly to the Board on volumes, categories, ageing, overdue cases, extension reasons, outcomes, redress, FSA referrals, evidence gaps, outsourcing failures, vulnerability issues and recurring causes. Reports distinguish final responses from accepted resolutions and completed remedies.

A serious conduct allegation, repeated unjustified adjustment, material loss, systemic defect or threatened deadline breach is escalated immediately rather than waiting for a periodic report. The Officer assigns corrective actions with owners, dates and completion evidence, and checks whether other clients are affected and need remediation.

Compliance maintains the regulatory reporting calendar and completes applicable consumer protection returns and FSA submissions using reconciled complaint data. Reporting forms, frequency and due dates must be checked against current applicable requirements and directions; internal Board reporting does not replace regulatory reporting.

8.2 Training Publication and Review

Employees and relevant outsourced staff receive training on joining, at least annually and whenever a material change is made. Training covers complaint recognition, receipt dates, deadlines, vulnerability, evidence, objective review, communications, records, privacy and FSA cooperation. Completion and understanding are documented; managers arrange refresher training after an identified failure.

Equiti makes the current policy and client procedures available to the public, including on its website and on request, and provides complaint information when establishing a client relationship. The client summary in Appendix E supports this disclosure but does not replace access to the full policy. Client terms, website notices, forms, portal messages and provider scripts must use consistent deadlines and contacts.

Compliance reviews this policy at least annually, and sooner after legal changes, FSA feedback, material findings or changes in operations. Material revisions require Board approval, controlled versioning, staff communication and updated public information. No manager may waive a statutory requirement through an internal exception.

Equiti encourages feedback on the complaint handling process. Compliance records useful feedback and tests whether improvements have addressed the identified problem, rather than closing an action solely because a procedure was rewritten.

9 Contact Information

Equiti Compliance: compliance_seychelles@equiti.com
Equiti Support: support.sey@equiti.com

Clients may also use telephone, in-person, postal, website, portal or chat channels available through Equiti's published contact details. Compliance verifies that published telephone and office details are correct before issuing the approved policy to the public. Direct access to Compliance is available without first completing a Support stage.

Financial Services Authority: Bois De Rose Avenue, P.O. Box 991, Victoria, Mahé, Seychelles.

Telephone +248 4380800.

Email complaints@fsaseychelles.sc. Website https://fsaseychelles.sc.

The official Complaint Form and submission instructions are available through the Authority's website.

10 Adoption and Implementation

The Board approves this policy and records the effective date as of February 2025. The Compliance Officer becomes the designated Complaints Handling Officer from that date. The Board appoints an unconflicted substitute and ensures the Unit can access records and operate the required deadlines immediately.

From adoption, apply these controls to new and open complaints without resetting original receipt dates. Review every open case for deadlines, missing evidence and uncompleted remedies. Identify any historic failure honestly and record the corrective action. The policy does not prove that Equiti's earlier handling complied with requirements or that a procedure now introduced was followed previously.

The age of a client's account does not justify using superseded complaint deadlines. The specific transitional provision in regulation 20 concerns complaints already pending under the 2008 Regulations; Compliance must verify any reliance on that provision rather than assume it applies to old accounts.

- On adoption: activate the register, diary controls, mailbox ownership, substitute cover and evidence preservation; allocate all open cases.
- Within two business days of adoption: publish the approved policy and client information and remove inconsistent website or Support deadlines. Verify published telephone and office contact details against Equiti's official records.
- Within five business days: brief employees and providers, circulate templates and confirm departmental access and responsibilities.
- Within ten business days: complete a documented review of the existing register and open files; correct gaps with dated audit entries and report overdue items to management.
- Within 30 calendar days: report implementation results to the Board, including contract wording requiring formal amendment, training completion, record retrieval testing and remaining corrective actions.

These implementation targets do not defer a legal obligation. If a system change cannot be completed immediately, the Officer must operate a secure manual register and diary process from adoption. Updating client terms must follow the applicable amendment and notice requirements; adoption of this policy does not itself amend an existing contract.

Appendix A Complaint Form Template

This form is optional. A complaint will also be accepted by email, telephone, in person or through another available channel. Staff will assist clients who need help. A missing signature or incomplete form must not prevent registration and evidence preservation.

A1 Personal Information

Full name: _____
Email: _____
Telephone or other contact: _____
Client profile number if known: _____
Relevant trading account numbers if known: _____
Preferred language English / French / Creole: _____
Assistance or accessibility needs: _____

A2 Complaint Details

Date or period of incident: _____
Product service or transaction: _____
Category Execution / Account / Information / Service / Fees or Payments / Technical / Other
Please explain what happened and what concerns you. Add further pages if needed.

_____

_____

Relevant order or deal numbers and dates if available: _____

A3 Supporting Documents

List or attach relevant documents, screenshots or correspondence you have. Equiti will also obtain its own relevant records.

_____

A4 Outcome Sought

Please explain what you would like Equiti to do.

_____

A5 Representative and Acknowledgement

Representative name and contact if applicable: _____
Written client authority attached Yes / No / To follow
Equiti will use the information for legitimate complaint handling and related legal or regulatory purposes. A separate consent checkbox is not required to lodge the complaint.
Written authority is required where a representative acts for the client.
Client signature if supplied: _____ Date: _____

A6 Internal Use Only

Complaint reference: _____ Received by: _____

Original receipt date time and time zone: _____

Channel: _____ Assigned handler: _____

Acknowledgement due: _____ Response due: _____

Related Support or closure case references: _____

Appendix B Complaints Register Template

Maintain one controlled spreadsheet or case-management register with one row per complaint, linked to the detailed file described in Appendix C. The field specification below is the usable register template. Keep separate fields rather than compressing all information into an unreadably wide printed table.

Field group	Required information
Identification	Complaint reference; related Support and closure cases; client name and contacts; client profile number; each relevant trading account; representative and written consent.
Receipt and incident	Original lodging date and time; channel; receiving employee or provider; incident date or period; language; relevant demographics including age and gender where available; accessibility needs.
Complaint	Product or service; subject and full description; issues; remedy sought; internal classification; risk and urgency.
Ownership and dates	Assigned handler; reviewer; conflict checks; acknowledgement due and sent; response due and sent; extension approval, reason and revised date; update dates; delivery evidence.
Investigation	Plan; requests and responses; evidence index; contracts; technical and financial analyses; missing records; findings; source references; original and later decision approvals.
Outcome and remedy	Determination per issue; final response; proposed remedy; acceptance period and acceptance status; action taken; payment and implementation evidence; actual resolution date where achieved.
Escalation and closure	Internal review; FSA reference and correspondence; information request dates and deadlines; litigation or appeal; closure reason; outstanding actions; root cause; corrective action owner and completion.
Retention	Last transaction date; complaint closure date; scheduled retention review; legal holds; access restrictions; file location; change history.

Minimum status choices: Received; Investigating; Awaiting information; Extended; Final response issued; Remedy pending; Client dissatisfied; FSA review; Resolved; Withdrawn; Administratively closed. Retain the history of status changes. “Awaiting information” does not pause deadlines; “Final response issued” does not equal “Resolved”.

Register Completion Guidance

Do not use the final response date as the resolution date unless resolution has actually been achieved. Record acceptance status, remedy completion and continuing dissatisfaction separately. Update records using actual dates and preserve earlier entries. Record notification decisions and their legal basis; do not mark every unresolved case as automatically reportable.

Appendix C Information to Collect Record and Retain

C1 Client Identification

- Client and representative identity and contacts, written representative authority, client profile number, each affected trading account, relationship status, language preference, relevant demographics and accessibility needs.

C2 Complaint Details

- Original receipt timestamp, channel and recipient; incident date or period; description in the client's own terms; issues, category, instruments and transactions; outcome sought and risk assessment.

C3 Evidence and Supporting Documents

- Original communications and attachments, chat and call records or notes, complete relevant histories and audit or pricing records, operative contracts and amendment evidence, and all client submissions. Retain underlying records relied upon in screenshots or extracts.

C4 Investigation Record

- Assigned handler and reviewer, conflicts assessment, investigation plan, chronological action log, internal requests, findings linked to evidence, missing information and searches, technical explanation, validated calculations and independent approvals.

C5 Determination and Remedial Action

- Outcome and reasons per issue, proposed remedy, acceptance period and status, implementation and payment evidence, unresolved tasks, actual resolution where achieved, root cause and preventive action.

C6 Communications

- Acknowledgement and dispatch evidence, deadline calculations, updates, extension approval and notice, final response and requested language, internal review, escalation information and client replies.

C7 Regulatory Information

- FSA case references, requests and response deadlines, complete submissions, notification assessment and legal basis, directions, litigation or appeal and preservation holds.

C8 Retention and Security

- Retention dates, physical and digital locations, access controls, backups, legal holds and audit trail. Apply section 5 6 retention controls, including the statutory physical-record requirement and Equiti's minimum for complaint files in every format.

Appendix D Communications and Approval Templates

Complete the bracketed fields from the case record and remove drafting instructions before dispatch. Adapt each template to the facts and retain the approved final communication.

D1 Acknowledgement

Subject: Your complaint — [reference]

Dear [name],

We acknowledge the complaint received on [original date] concerning [brief summary]. Your reference is [reference]. [Named person and role] is responsible for handling it and can be contacted at [email and telephone or other available contact].

We will review the issues and aim to provide our response by [date within 21 business days of original lodging]. If a grossly complicated investigation requires an extension under the applicable Regulations, we will explain this in writing and provide a revised date.

Please let us know if our summary misses an issue, if you have relevant supporting information, or if you need assistance or would prefer our final response in English,.

Kind regards,

[Approved sender]

D2 Progress update

Dear [name],

We are continuing our review of complaint [reference]. We have completed [accurate description] and are currently examining [outstanding work]. We [do/do not] require the following information from you: [specific request and reason, if applicable].

Our expected response date remains [date]. We will contact you again by [next update date] or sooner if we complete the review. Your contact remains [name and contact].

Kind regards,

[Sender]

D3 Exceptional extension notice

Dear [name],

Your complaint [reference] was lodged on [original date]. The investigation is grossly complicated because [specific, factual reasons]. We have completed [work] and still need to [necessary steps]. These steps cannot reasonably be completed by [ordinary response date] because [explanation].

We are therefore applying the extension permitted by regulation 9 of the Financial Consumer Protection (Complaint Handling) Regulations, 2024. We will provide our response by [exact date no later than 90 business days from original lodging]. We will update you by [next date].

You may contact [designated person and details] with any questions. Information on the FSA's complaint process is available at:

https://fsaseychelles.sc or complaints@fsaseychelles.sc.

The FSA determines whether a complaint meets its submission requirements.

Kind regards,

[Approved sender]

D4 Final response

Subject: Final response to your complaint — [reference]

Dear [name],

We have completed our review of your complaint received on [date]. You raised [overview and each material issue].

We considered [issues and relevant evidence, with dates and clear source descriptions]. Our determination is [upheld/partly upheld/not upheld, stated separately for each issue]. The reasons are [plain explanation of facts, relevant contractual or regulatory provisions and how they apply]. [Explain material evidence limitations where applicable.]

[Where an amount is disputed: identify affected transactions, provide or attach the validated calculation, explain the treatment of deposits and other components, and state the precise contractual basis of the action.]

We propose [remedy and calculation, or explain why none is proposed]. Please tell us by [date] whether you accept or decline this proposal. [State payment or implementation arrangements and expected date.] If you need more time to consider it, please contact us.

If you remain dissatisfied, you may request a further internal review or lodge a complaint with the Financial Services Authority. A further internal review is optional. The FSA's official Complaint Form and instructions are available through:

https://fsaseychelles.sc. Its contact details are: Bois De Rose Avenue, P.O. Box 991, Victoria, Mahé, Seychelles; telephone +248 4380800; email: complaints@fsaseychelles.sc.

Please contact [designated person and details] if you require clarification.

Kind regards,

[Approved signatory and role]

D5 Final Response Approval Checklist

- All issues and client submissions have been considered; the original receipt date and deadlines are correct.
- Evidence is indexed, complete enough for the conclusion and available for retrieval. Missing material and limitations are accurately disclosed.
- Technical statements are confirmed by the technical team; calculations and payment records are confirmed by Finance.
- Applicable contract versions, amendments, remedies and regulatory obligations have been checked.
- Original decision evidence is distinguished from later analysis; the letter makes no unsupported claim about reviews completed.
- An unconflicted reviewer has assessed fairness and the decision; required management and financial approvals are recorded.
- The final response contains the overview, issues, outcome, remedy and acceptance period, and FSA referral rights and contacts.
- Requested language and accessibility needs are met; confidentiality and any redactions have been checked.
- The approved final version and dispatch evidence will be retained; register status and outstanding remedy tasks will be updated.

Case reference: _____ Prepared by: _____
Independent reviewer: _____ Date: _____
Approving manager or director where required: _____
Approval date and evidence reference: _____

Appendix E Client Complaints Information

Equiti Brokerage (Seychelles) Limited welcomes the opportunity to review any concern about its products, services or conduct. Our complaints service is free. You do not need a special form or a lawyer to complain, and you may contact Compliance directly.

How to complain

Email: support.sey@equiti.com or compliance_seychelles@equiti.com. You may also complain by telephone, in person, through our available website, portal or chat channels, or in writing using the office contact details published on Equiti's website. Any member of our team receiving your complaint will refer it to the responsible complaints officer.

Please tell us your name, contact details, client profile or account number if available, what happened, relevant dates and the outcome you would like. Include any useful documents. If you need help making a complaint, tell us. We will assist you and accommodate reasonable accessibility needs. A representative may act with your written consent.

What happens next

We aim to acknowledge your complaint within one business day and will do so in writing within two business days at the latest, give you a reference and contact person, and tell you when to expect our response. We will investigate fairly and respond as soon as possible, normally no later than 21 business days from when you lodged the complaint with us. Moving your complaint between Support and Compliance does not restart that period.

For a grossly complicated complaint, the Regulations permit an extension to a total of 90 business days from lodging. If this applies, we will write to you explaining the reason and giving a revised response date. We will keep you informed while the investigation continues.

Our final response will explain the issues considered, our findings and reasons, and any proposed remedy and time for accepting or declining it. You may request it in English, French or Creole. If you disagree, you may request a further internal review; this is optional and does not remove your right to approach the FSA.

If you remain dissatisfied

The FSA Guidelines require you to complain first to Equiti and allow the acknowledgement and determination periods before escalating. If you remain dissatisfied, contact the FSA and use its official Complaint Form and instructions. Keep your complaint, our responses and supporting documents. The FSA determines whether it can consider the matter under its rules.

Financial Services Authority • Bois De Rose Avenue, P.O. Box 991, Victoria, Mahé, Seychelles • Telephone +248 4380800 • complaints@fsaseychelles.sc • https://fsaseychelles.sc

You will not be penalised for complaining. We protect your information and share it only where needed for legitimate complaint handling or where legally required. This information takes effect with the approved policy; the complete policy is available on request and through Equiti's published policy information.

Appendix F Regulatory References and Control Mapping

Reference	Policy coverage
Regulations 3 to 7	Sections 2, 3, 5, 6, 7 and 8 — access, resources, assistance, independence and training
Regulations 8 to 10	Section 5 and Appendix D — acknowledgement, response, extension and final communication
Regulation 11 and Act section 11	Section 5 6 and Appendices B and C — records, retention and FSA information requests
Regulations 12 and 13	Sections 3, 7 and 8 and Appendix E — public information and protection from discrimination
Regulation 20	Section 10 — limited transitional provision
FSA Guidelines sections 2.4 and 5.2 and section 6	Sections 5 5 and 9 and Appendix E — prior complaint to Equiti, FSA referral and cooperation

Primary references checked on 8 October 2026. The Regulations are the primary basis for Equiti's statutory deadlines; additional monitoring and service targets in this policy are Equiti's governance controls.

- Financial Consumer Protection (Complaint Handling) Regulations, 2024 — SI 110 of 2024.
- FSA Complaints Handling Guidelines — version 15 September 2025:
- Financial Consumer Protection Act, 2022 — section 11 on record retention.