Complaints Handling Policy

I. INTRODUCTION

This policy regulates the submission and handling of complaints in a clear, simple and comprehensive manner in relation to the performance and procedures of Securcap Securities Limited operating under the brand name Ontega (the "**Company**"). The Company shall maintain internal records of complaints including measures taken for expedient complaint resolution in line with applicable Laws, Rules and/or Regulations.

II. DEFINITIONS

Complaint:

- Complaints are defined as specific requests, issues or claims related to the performance, services or products of the Company which objects to 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, event or requesting general information about the operation and services of the Company shall not constitute a complaint and will not be recorded as such.

Complainant:

- 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.
- 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 as an attempt to accelerate the procedure in an utmost fair manner.

III. SUBMITTING THE COMPLAINT

The Complainant, if possible, should include the below information when submitting a formal Complaint to the Company:

- Name and surname of account holder;
- Registered e-mail address;
- Specific reference to and/or report of the event or the date of the event, clearly outlining the subject and/or the nature of the complaint; and
- Any relevant supporting evidence held by the Complainant

The abovementioned points are necessary to enable the Company proceed with investigating the complaint as efficiently as possible.

A Complainant may submit a complaint to our Company in the following ways:

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

The Customer Service Department shall upon receiving notice of a complaint manage and initiate communication with the Complainant so as to receive further information. Where needed and/or requested, the Customer Service Department shall assist the Complainant in compiling and submitting a Complaint. The Complainant must submit complaints related to services rendered on the basis of the Client Trading Agreement to the Company's Customer Service. The contact details of the Customer Service department are available on the 'Contact Us' page of the Company's website.

The telephone line of the Customer Service is available for submitting complaints by the client by verbal means. If the Complainant calls another telephone number of the Company to submit his/her complaint, he/she will be redirected to the Customer Service. Clients wishing to submit complaints personally, may visit the head office of the Company in office hours on the working days. Alternatively, clients who wish to submit complaints and/or raise issues in writing will be required to include all the relevant information as per this section.

IV. REGISTRATION OF COMPLAINTS

The Company, until dealt with, shall register all complaints in a complaint register that is updated and monitored on an ongoing basis. This register shall record at least the following information:

- date of submitting the complaint
- customer ID
- name and surname of the complainant
- nature of the complaint
- brand name
- measures implemented to settle or solve the complaint
- status of complaint

The Company manages complaints within a transparent system that 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 will then acknowledge the receipt of the complaint within 2 working days.

V. 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:

- **Customer Service**
  All complaints are to be settled and/or determined without undue delay. If immediate settlement of a verbal complaint is not possible or the Complainant rejects the solution offered on the spot, the Company shall record the complaint and the Company's position in a memorandum to be provided to Customer Service, unless the complaint was submitted directly to Customer Service. Similarly, all complaints submitted in writing are provided to Customer Service. Customer Service shall be responsible for settling complaints. The officers of the Customer Support Department will inform the complainant of the appropriate process to follow.

- **Compliance**
  If Customer Service is unable to settle the complaint efficiently or within a reasonable period of time, they shall forward the complaint to Compliance. If the Complainant does not accept the solution offered by Customer Service, the Complainant is also entitled to approach Compliance directly by writing an email to customer.service@ontega.com or compliance@green-pole.net.

- **Directors**
  Directors represent the highest level of authority in deciding the settlement of complaints particularly those complaints which cannot be managed by the above procedure. The Directors shall take into account the opinion of the Compliance Officer of the Company.

If a person and/ or any third party is to contact the Company on behalf of another person and/or claims to represent another person, we shall require proof of a power of attorney and/or the client's consent to the handling and/or representation by a third party. The Company shall aim to resolve the matter within thirty (30) business days and you understand that in providing its determination on the matter(s) it may require your assistance and/or further evidence and/or additional information.

VI. 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, the nature and the amount of supportive information and cooperation is provided from the Complaint. If the Complaint is more complex and/ or the Complainant does not provide with the additional and/or supportive information so as to assist in the expediting of the procedure, the time period of thirty (30) business days to resolve may be extended. In such circumstances, the Company will communicate and/or devote efforts to communicate with the Complainant.

Clients accept and acknowledge that they may be requested to supply additional information required for investigating the complaint. In this case the client is to respond at their earliest convenience. In failing to do so, the Company shall not remain liable for any given delay(s) in reverting with a determination.

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 submitting the complaint to confirm his authorization and the nature of the complaint in question.

The Company adds a correct, clear and unanimous reasoning to every decision given in order to settle complaints, which are e-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, whilst informing the Complainant about the decision in question, the Company will inform the Complainant about the opportunities of appeal and possible damage compensation.

VII. MONITORING OF COMPLAINTS

After settling the complaint, the Company shall preserve every written or electronic documents related to it for a period of 3 years. The Company shall be entitled to prepare statistics and reports about complaints, which will be aimed to improve the efficiency of administering complaints.

VIII. 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 Seychelles Financial Services Authority.