



COMPLAINTS HANDLING PROCEDURE

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1. Introduction

- 1.1. XLibre (hereinafter referred to as the “**Company**” or “**we**”), is incorporated under the laws of the Republic of Mauritius with registration number 182094/GBC. The Company has been granted an Investment Dealer License with number GB21026537 under section 29 of the Securities Act 2005, Rule 4 of the Securities (Licensing) Rules 2007 and the Financial Services (Consolidated Licensing and Fees) Rules 2008 (herein the “**Law**”) licensed by the Financial Services Commission (herein the “**FSC Mauritius**”).
- 1.2. The Company has implemented and maintains a Complaints Handling Procedure (the “**Procedure**”), which is described in this document.

2. Interpretation of Terms

- 2.1. Unless the context requires otherwise, all terms included in this Procedure shall have the meaning given to them herein. Where the context requires, (a) words importing the singular shall include the plural and vice versa and (b) words importing the masculine shall include the feminine and vice versa.

3. Scope of the Complaints Handling Procedure

- 3.1. The purpose of the Procedure is to set out the internal complaint resolution system and procedures which the Company has established, maintains and follows for the resolution of complaints.

4. Definition of a Complaint

- 4.1. A complaint is an expression of dissatisfaction by a Client regarding the provision of investment and/ or ancillary services provided to him by the Company. Complainant is the person, natural or legal, which is eligible for lodging a complaint to a Company and who has already lodged a complaint.

- 4.2. A complaint received by a Client shall include:
- (a) the Client's name and surname;
 - (b) the Client's trading account number;
 - (c) the affected transaction numbers, if applicable;
 - (d) the date that the issue arose and a description of the issue.
- 4.3. A complaint must not include offensive language directed either to the Company or a Company employee.

5. Procedure

- 5.1. All complaints or grievances must be in writing and shall be addressed, to the Customer Support Department of the Company via email at support@exalibre.com (for any issues other than trading issues) or the Trading department reachable at trading@exalibre.com for any trading issues.
- 5.2. If the client receives a response from the Customer Support or Trading Department but deems that the complaint or grievances needs to be raised further for an independent review, the client may either ask the Customer Support or Trading Department to escalate it to the Client Audit Team or directly contact the Client Audit Team (clientaudit@exalibre.com), which will independently and impartially investigate it.
- 5.3. The Company will not be able to handle or investigate a complaint, if the requirements included in paragraphs 4.2 and 4.3 above are not fulfilled. In such an event the Company shall revert back to the Client and request him to send any additional information. In any event, one of the Company's officers may contact the Client directly in order to obtain further clarifications and information relating to his complaint. The Company shall need the Client's cooperation in order to handle the complaint.
- 5.4. Upon receipt of the complaint the department which has received the complaint shall record the complaint in the complaints registered maintained by the Company as per Par. 8 of the Procedure.

- 5.5. The Company shall thoroughly examine all complaints as required (taking into account any information contained within the books and records of the Company, including but not limited to the Client's trading account history) without undue delay.
- 5.6. The Company will treat each complaint with reasonable care and reach a fair outcome.
- 5.7. Upon receiving the complaint, the Company will inform the complainant within five (5) business days that it had received the complaint and provide him with a unique reference number, which shall correspond solely to his complaint and it must be used throughout his correspondence with the Company regarding the specific matter and/or complaint.
- 5.8. The Company shall send its initial response to the Client within ten (10) business days from the actual receipt of the complaint. If the complaint requires further investigation and it cannot be resolved within ten (10) business days, it will issue a holding response in writing or in other durable medium. When a holding response is sent, it will indicate when the Company will make further contact and inform the Client on the progress of the investigation.
- 5.9. The Company shall investigate and reply to the complainant within two (2) months from the date of reception of the complaint.
- 5.10. Upon completion of the investigation the Company shall send a written notice to the complainant informing him:
 - (a) Of the outcome of the investigation along with the reasons for reaching such a decision; or
 - (b) If applicable, the nature and terms of any offer and/or settlement.
- 5.11. If the Company does not manage to conclude its investigation and/or respond to the complainant within two (2) months from the date of receipt of the complaint, the Company shall send a written notice explaining the reasons for not reaching a decision and/or concluding the investigation yet, the reasons for the delay as well as indicate the period of time within it shall be able to complete the investigation. It is noted that the Company shall not provide its response later than three (3) months from the submission of the complaint.

6. Principles of the Procedure

- 6.1. All complaints shall be treated confidentially.
- 6.2. The Company shall deal with Client's complaints without undue delay.
- 6.3. The company will resolve all complaints in a fair manner.

7. Frequently Asked Questions (FAQs)

- 7.1. Questions regarding this procedure should be sent to the Customer Support Department.

8. Record Keeping

- 8.1. The Company has established, maintains and updates the complaints register with details of all the complaints received per month for a period of seven (7) years. The following information is recorded in the complaints register:

- (a) date of the complaint;
- (b) wallet number;
- (c) identification of the complainant;
- (d) complaint cause;
- (e) the financial instrument;
- (f) the disputed amount;
- (g) settlement date if applicable; and
- (h) any comments thereof.

9. Contacts

- 9.1. Customer Support Department: support@exalibre.com .
- 9.2. Trading Department: trading@exalibre.com.
- 9.3. Client Audit Team: clientaudit@exalibre.com.

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