

COMPLIANTS HANDLING POLICY

(Jan 2026)

1 Introduction

This Complaints Management Policy describes the framework established by **B2B Prime Services Bahamas Limited** (“the Firm”) for the effective, transparent, and fair handling of complaints relating to its regulated activities.

This Policy is defined and endorsed by Senior Management and the Board of Directors, who are responsible for its implementation and ongoing oversight, taking into account the size and nature of the Firm’s regulated activities.

2 Purpose

The purpose of this Policy is to ensure that the Firm has effective and transparent complaints management procedures in place, enabling clients or potential clients to express dissatisfaction with the Firm’s services.

The Policy aims to ensure complaints are handled promptly, fairly, independently, and consistently, while supporting the identification and remediation of any operational, regulatory, or control deficiencies.

3 General Principles

The Firm shall establish, implement, and maintain effective and transparent complaints management procedures for the prompt handling of client complaints.

Complaints shall be handled independently, fairly, and without undue delay. The Firm shall keep appropriate records of all complaints received and the measures taken for their resolution.

The Firm shall communicate with complainants in clear, plain, and easily understandable language and shall ensure effective resolution of complaints.

4 Internal Complaints Procedures:

The Firm shall maintain an independent complaints management function responsible for the receipt, investigation, handling, and resolution of complaints, in line with the principle of proportionality.

- (a) Receiving complaints.
- (b) Responding to complaints.

- (c) Meeting any service standards in relation to complaints.
- (d) Referring complaints to other regulated financial institutions.
- (e) Investigation of complaints by a person of sufficient competence who was not directly involved in the subject of the complaint.
- (f) The person responsible for responding to a complaint has the authority to settle the complaint (including offering redress if appropriate) or has ready access to someone who has the necessary authority.

5 Receiving Complaints

Upon receipt of a complaint, the Firm shall acknowledge receipt without undue delay and, in any event, within five (5) business days, informing the complainant of the complaints-handling process and the indicative handling timeframe.

and shall aim to provide a final response within a reasonable period not exceeding sixty (60) calendar days, unless the nature of the complaint requires additional time, in which case the complainant shall be informed accordingly.

6 Investigating Complaints

Complaints shall be investigated by a person of sufficient competence who was not directly or indirectly involved in the subject matter of the complaint, ensuring independence and the avoidance of conflicts of interest. Significant complaints that involve breaches of regulations or internal policy will be handled by the Compliance Officer in consultation with the relevant employee. If the matter impacts the Firm's reputation, legal counsel must be consulted and, where applicable, the Regulator will be notified.

During the investigation, all relevant employees shall disclose all relevant facts, provide necessary documentation, and fully cooperate with the Compliance Function.

7 Settlement of Complaints

All complaints are investigated, and clients are informed of the outcome as soon as possible. If the Firm is at fault, it will issue an apology, correct the situation, and reimburse where appropriate. The Firm shall provide a final written response to the complainant, setting out the outcome of the investigation and the Firm's position on the complaint.

This response may accept or reject the complaint or offer redress. If the client is not satisfied, the Firm shall inform the complainant of their right to pursue the matter through alternative dispute resolution mechanisms, the competent regulatory authority, or the relevant courts. If no reply is received within ten working days of the written response, the Firm may consider the complaint settled and resolved.

8 Client Redress

This Policy applies to complaints relating to the Firm's regulated activities where, following investigation, the Firm determines that redress is appropriate.

The Firm must then:

- (a) Provide the client with fair compensation, financial or otherwise, for any acts or omissions for which it was responsible.
- (b) Give effect to any offer of redress accepted by the client.

9 Complaints involving other regulated financial institutions

If your complaint relates partly or entirely to another regulated financial institution, we may refer it to that institution. In such cases:

- o We will inform you in writing and ask for your consent before sharing the complaint.
- o If you agree, we will refer the matter and provide you with the contact details of the person responsible at that institution.
- o We will continue to handle any part of your complaint that is not referred.
- o Any transfer of personal data will be carried out in line with applicable data protection laws.

10 Resolved Complaints

The Compliance Officer, in conjunction with the Senior Executive Officer, will determine if it is appropriate for the complaint to be accompanied to the client or business partner by a particular staff member and in what format the final response will take. The Compliance Officer may consider this in conjunction with the Senior Executive Officer;

When resolved, the Compliance Officer will notify the Client that the complaint has been resolved, and the appropriate procedures have been followed and finalise the entry in the complaints register.

11 Employee Awareness

The Firm shall ensure that all relevant employees are aware of and trained on the complaints management procedures. Employees shall confirm their understanding of this Policy and related compliance procedures on an annual basis.

12 Recording Complaints

All complaints received by the Firm shall be recorded by the Compliance Officer in a Complaints Register.

The record includes details of the complaint, the complainant's name, who investigated it, all correspondence, and any steps taken to resolve issues or prevent recurrence.

Complaints are kept on record for at least 6 years. Complaints Register & Status

13 Complaints Report

Every complaint is tracked until resolutions.

Status "Open" means the complaint is still under review.

Status "Closed" means the complaint has been resolved or is deemed outside the

14 Compliance Reporting

The Compliance Officer reports complaints to the Board, either through standalone Complaint Reports or as part of compliance reporting.

These reports ensure remedial actions are taken promptly where required.

15 Analysis and Reporting

The Board reviews complaints to confirm proper handling and to identify any systemic or procedural issues.

Where necessary, the Compliance Officer escalates matters into the Breach Register and requests corrective measures to prevent recurrence.

Periodic reports, at least annually, are presented to the Board.

The Compliance Officer shall analyse complaints-handling data on an ongoing basis to identify recurring or systemic issues, potential operational or regulatory risks, and recommend corrective measures where necessary.

COMPLAINT HANDLING FORM

B2B Prime Services Bahamas Limited (the “Firm”) is committed to handling complaints promptly, fairly, and efficiently.

Clients may submit complaints using this Complaint Handling Form, which should be completed in full and submitted to the Firm’s Compliance Function.

Complaints may be submitted:

- By email; or
- By registered post to the Firm’s registered office.

The Compliance Officer is responsible for handling complaints independently and in accordance with the Firm’s Complaints Management Policy.

The Firm aims to provide a final response within a reasonable period and no later than sixty (60) calendar days from receipt of the complaint. Where additional time is required, the complainant will be informed accordingly.

Contact Details – Compliance Function:

- **Compliance Officer:** Kesna Pinder
- **Email:** complaints.bh@b2prime.com
- **Address:** ARISTO HOUSE, SANFORD DRIVE, NASSAU, BAHAMAS NP
Bahamas

Note: If a complaint involves the Compliance Function, it shall be escalated to Senior Management.



COMPLAINT FORM TEMPLATE

Way of Communication	<input type="checkbox"/> Registered Post	<input type="checkbox"/> Email
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Client Details				
Name:		Surname:		
Legal Entity Name:				
Account Number:				
Address:				
Post Code:		City:		Country:
Telephone Number:	Home:	Work:	Mobile:	Fax:
Email:				
Brief Summary of the complaint Description of product or service and/or department and/or employee you are complaining about (description, evidence, magnitude of damage and suggested way to be solved):				
Please enclose any other relevant documentation that may help us to handle the complaint.				
Declaration <input type="checkbox"/> I confirm that the information provided above is accurate to the best of my knowledge.				
Date:				
Signature:				

COMPLAINTS HANDLING PROCESS (CLIENT INFORMATION)**Upon receipt of a complaint, the Firm shall:**

1. Acknowledge receipt of the complaint without undue delay;
2. Register the complaint and assign a reference number;
3. Investigate the complaint independently and fairly;
4. Communicate with the complainant in clear and plain language;
5. Provide a final written response setting out the Firm's position and the outcome of the investigation.

If the Firm is unable to provide a final response within the expected timeframe, the complainant will be informed of the reasons for the delay and the expected completion date.

FURTHER ACTION IF YOU ARE NOT SATISFIED

If you are not satisfied with the Firm's final response, you may have the right to pursue the matter further through:

- Alternative dispute resolution mechanisms (where applicable);
- The competent regulatory authority; or
- The relevant courts of competent jurisdiction.

Please note that regulatory authorities do not generally provide compensation or adjudicate individual disputes but may consider complaints as part of their supervisory role.

Further information will be provided to you in the Firm's final response letter.

COMPLAINT ACKNOWLEDGEMENT

Once a complaint is submitted, the Firm will issue a written acknowledgement confirming:

- Receipt of the complaint;
- The complaint reference number;
- The responsible department or officer;
- The indicative timeframe for handling the complaint.

The Firm is committed to ensuring that all complaints are handled fairly, transparently, and in accordance with applicable regulatory requirements.