

Customer Complaint Policy – Everytrade 24 LTD

Global Business Licence (GBL) – Licence No. GB25204986

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Everytrade24 Ltd is an Investment Dealer (Full-Service Dealer, excluding Underwriting), regulated by the **Financial Services Commission ('FSC')** in Mauritius (hereinafter referred to as the "**Company**").

This Policy regulates effective, clear and fast handling of complaints and disputes submitted to the Company in relation to the performance and procedures of the Company.

1. Introduction

The Company is committed to providing high-quality services to its clients. In the event that a client is dissatisfied with any aspect of our services, the Company has established a comprehensive Complaints Resolution System to address and attempt to resolve such concerns promptly and fairly.

2. Complaints Handling Team

First level:

Complaints will be managed by the Complaints Handling Team led by the complaints handling coordinator. The Coordinator will report to the Board Members and provide regular updates to the Compliance Officer. All client complaints against the Company must be addressed to the team via email at compliance@everytrade24.com. The team will be responsible for the day-to-day management and resolution of complaints.

Second Level:

The Compliance Officer is designated to oversee the complaints handling process, ensuring proper governance and directly liaising with the Commission when required.

Third Level:

The Board will maintain overall oversight of the complaints handling framework, ensuring accountability and adherence to regulatory requirements.

This structured approach ensures a clear segregation of duties, strengthens oversight, and mitigates potential conflicts of interest. Additionally, it enables the Compliance Officer to engage independently with the FSC while ensuring effective supervision of the entire process, where necessary.

3. Scope of Duties:

A. Complaints Handling Coordinator

The Complaints Handling Coordinator plays a crucial role in ensuring that customer complaints are handled efficiently, fairly, and in compliance with regulatory requirements. Their responsibilities typically include:



Key Responsibilities:

a. Complaint Intake & Acknowledgment

- Serve as the first point of contact for receiving complaints from clients.
- Acknowledge complaints in a timely manner and provide customers with a reference number for tracking.

b. Investigation & Resolution

- Gather relevant details and documentation related to each complaint.
- Coordinate with internal teams (compliance, legal, customer support, operations) to investigate complaints.
- Ensure that complaints are addressed within the regulatory timeframes and in accordance with company policies.

c. Escalation & Reporting

- Escalate unresolved or high-risk complaints to senior management, the Compliance Officer, and the Board as required.
- Maintain a comprehensive complaints register and track resolution progress.
- Provide periodic reports to the Compliance Officer and Board on trends, unresolved issues, and areas requiring improvement.

d. Regulatory Compliance & Liaison

- Ensure that complaint-handling procedures align with regulatory guidelines and internal policies.
- Support the Compliance Officer in liaising with regulators, such as the Financial Services Commission (FSC), where required.

e. Process Improvement & Customer Feedback

- Identify recurring issues and suggest process improvements to enhance customer experience.
- Ensure that customer feedback from complaints is used to improve services and risk management.

f. Documentation & Record Keeping

- Maintain accurate and up-to-date records of all complaints, responses, and resolutions.
- Ensure proper documentation for audits, regulatory inspections, and internal reviews.

By efficiently managing complaints, the coordinator helps safeguard the Company's reputation, ensures regulatory compliance, and improves overall customer satisfaction.

B. Compliance Officer

The Compliance Officer's role in the complaints handling process is strictly limited to liaising with the Financial Services Commission (FSC). The Compliance Officer is not accountable for the day-to-day management, resolution, or investigation of complaints but will:



- Act as the primary point of contact between the Company and the FSC regarding complaints.
- Ensure that all regulatory reporting and disclosures related to complaints are made to the FSC in a timely and accurate manner.
- Provide updates to the Board on any regulatory developments, concerns, or guidance received from the FSC concerning complaints handling.
- Verify that the complaints handling framework operates in line with regulatory requirements but without direct involvement in individual cases.

C. Board of Directors

The Board of Directors holds ultimate oversight of the complaints handling process and ensures governance and compliance by:

- Establishing and maintaining a robust complaint handling framework that aligns with regulatory expectations.
- Appointing and overseeing the complaints handling team, ensuring its effectiveness and independence.
- Reviewing periodic reports on complaints received, handled, and resolved to ensure compliance with internal policies and regulatory requirements.
- Addressing systemic issues arising from complaints and implementing necessary policy or procedural changes.
- Ensuring that the Compliance Officer has the necessary autonomy to liaise with the FSC without being directly involved in complaints management.

This structure ensures that responsibilities are clearly defined, the Compliance Officer remains independent in regulatory liaison, and the Board maintains strategic oversight without operational involvement in individual complaints managed by the Coordinator.

4. Complaint Handling Timeframe

Upon receipt of a complaint, the Company will acknowledge it promptly and attempt in its best capacity to resolving it within thirty (30) days. The coordinator shall oversee the transparent, independent, courteous, and efficient handling of all complaints, ensuring their resolution within the specified timeframe, as far as possible.

Formal complaints shall be formally acknowledged within five working days.	5 working days
Full reply will be made (as far as possible)	21 working days
*In case a full reply cannot be made within 21 working days of receipt, we shall advise the complainant accordingly and let the complainant know when a reply in full will be made.	
Resolution of complaint (as far as possible)	30 working days



The Company shall inform the complainant of any changes in the timeframe at the earliest. The coordinator must ensure that any conflicts of interest that arise are declared to the Board Members of the Company.

If a complainant remains dissatisfied with the proposed solution(s), they may contact the customer support team to provide specific clarifications regarding their concerns. The team will review the complaint objectively, on its merits, and with the guidance of Board members and the Compliance Team. Efforts will be made to address the complaint in a fair, unbiased, and equitable manner.

If the complaint is still not satisfied with the resolution proposed and actions taken, the complainant may lodge an appeal at the Financial Services Commission (Mauritius) to the Office of Ombudsperson for Financial Services.

Address: 8th Floor, SICOM Tower, Wall Street, Ebene Cybercity 72201.
Telephone: (+230) 460 0473/4
Email: ombudspersonfs@ofsmauritius.org
Website: <https://www.fscmauritius.org/en/consumer-protection/complaints-handling>

5. Registration of Complaints

It is important for the Complainant to ensure that inquiries are not confused with complaints and are addressed to the right team and email address for timely and appropriate assistance.

A complaint for the purposes of this policy shall refer to written expression of dissatisfaction/grievance for which redress is being sought, and which has not been addressed by the customer support department, in relation to the Company's product(s)/service(s). Complaint shall be differentiated from customer feedback and customer opinion.

If the customer's grievance falls within the definition of complaint, then the member of the Complaints Handling Team will register the complaint to the Complaints Register by allocating a unique reference number to the complaint which will be communicated to the complainant in the acknowledgement within 5 working days.

In case the Company receives a notification through the line of communication established by the Company to receive complaints, but which does not fall within the definition of "complaint" above and can be characterized as an inquiry or request, this shall be forwarded to the relevant department to be handled accordingly and the Complainant shall be informed of such action.

If the complaints handling team or customer support department has questions regarding a complaint, those questions shall be raised with the complainant in writing vide email.

The Company pays special attention to avoid collecting data about the complainant with the exception of recording data aimed to settle the complaint. Furthermore, the Company manages complaints within a transparent system; complaints shall be traced and administered in each and every stage of the procedure.



6. Managing Complaints

During complaint investigations, the Company will thoroughly examine and assess the following:

- The facts and the information provided by the complainant.
- The facts and the information provided by the officer responsible for the provision of those services (if applicable)
- The information/data which have been retrieved from the Company's archive (i.e. the complainant's transactions, trading history, correspondence, electronic email, recorded telephone calls, IT data etc)
- The events leading to the complaint

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

All complaints shall be taken seriously, handled transparently and promptly investigated.

7. Complaints Register

The Company shall maintain a Complaints Register to record all complaints received. The register will include the date of the complaint, acknowledgment date, nature of complaints, and actions taken.

8. Monitoring of Complaints

After settling the complaint, the Company shall preserve every document related to complaints for a period of seven (7) years, after customer's trading account closure, electronically. The Complaints Handling Supervisor shall be responsible for monitoring of complaints and closure of complaints.

The Company shall be entitled to prepare statistics and reports about complaints, which will be aimed to improve the efficiency of administering complaints.

9. Review and Amendment

This Complaint Policy shall be reviewed annually or within such period of time as may be determined by the Company subject to changes in local laws and regulations, to ensure its effectiveness. Any necessary amendments will be made to enhance the Company's commitment to handling complaints transparently and improving overall service quality.

The Company must develop and put into practice an independent and objective complaints resolution system, as provided below.



10. Standards for handling complaints

- (a) All complaints shall be dealt with due attention, whether they are formal or informal.
- (b) Complaint(s) will be treated in confidence, whatever such complaints.
- (c) Complaint(s) shall be dealt promptly.

11. Confidentiality

All complaints received will be dealt with confidentially and in accordance with the requirements of the Data Protection Act 2017.