

COMPLAINT HANDLING AND PROCESSING POLICY

March 2025

1. INTRODUCTION

This policy sets out the process that we, **B2B Prime Services SC Ltd** (a subsidiary of B2B Prime Services EU Limited) (the “Company”, “we”, “us”), licensed and regulated by the Seychelles Financial Services Authority (SFSA) with Security Dealer License SD192, follow when we receive a Complaint (as described below).

Pursuant to the Securities Act 2007, as amended, and its subsidiary regulations, the Financial Consumer Protection Act, 2022 (hereinafter referred to as the “Act”), the Financial Consumer Protection (Complaint Handling) Regulations, 2024 (hereinafter referred to as the “Regulation”), and relevant guidelines (together referred to as “Applicable Law”), a licensee shall have in place a complaint-handling policy approved by its board of directors. The Company maintains records of complaints and measures taken for expedient complaint resolution, in line with applicable laws, rules, and regulations.

2. COMPLAINTS

A “Complaint” is an expression of discontent directed or made to the Company, Company’s products or services, employees or the management where reaction or resolution is particularly or inevitably expected or lawfully required.

A “Complainant” is a natural or legal person, organization, or authorized representative receiving services from the Company or affected by its operations. The Company will verify authorization for Complaints submitted by representatives to ensure legal validity.

3. SUBMISSION OF COMPLAINTS

Complainants may submit their Complaints to the Company in writing, using the “Complaint Form” attached in Appendix 1. A Complaint may be submitted to the Company by the following means:

- To the Compliance Department through email at sc.compliance@b2prime.com; or

- By registered post at the Company's Headquarters

Complaints made by Complainants cannot be considered unless the Complaint Form is duly completed with all the required information and it is accompanied by adequate supporting evidence (as necessary) for the Complainant's claims.

In the event the Company receives a notice through the lines of communication that are used by the Company for the reception of Complaints, but in the event that such notice does not fall within the definition of 'Complaint' above and can be characterized as an enquiry; this shall be categorized as an enquiry rather than a Complaint and the person will be informed accordingly, and such enquiry will be forwarded to the relevant department to be handled accordingly. The person maintains the right to request for the re-classification of his enquiry as a Complaint.

4. COMPLAINT HANDLING PROCEDURE

Once a Complaint has been received, the following steps must be taken:

4.1 Acceptance of Complaint

For every Complaint the Company will provide an affirmation of receipt. Affirmation of Complaint's receipt will be provided via the most suitable means for communicating (e.g. email, letter) with the Complainant. The Company will acknowledge the Complaint and will send an initial response to the Complainant within 48 hours, which will include the following:

- a. A unique reference number for tracking purposes.
- b. An estimated resolution timeline.

4.2 Initial assessment and addressing of Complaints

- a. After accepting receipt of the Complaint, the Company will determine whether the matter raised in the Complaint is within the Company's expertise to resolve. The Company will also evaluate the resolution the Complainant has proposed in his Complaint (if any) and, if more than one matter needs to be resolved, consider whether each matter should be dealt separately.

At this stage it will be decided by the Company how the issue(s) raised by Complaint should be

resolved, and therefore evaluate:

- Complexity and urgency of the Complaint;
 - Impact on Complainant by raised issue;
 - The risks associated with the raised issue and possible future risks in case resolution of the issue is delayed or the positive result cannot be reached;
 - If third-party participation is required to reach a resolution.
- b. Once the initial assessment has been completed, the Company will determine how the Complaint should be managed, and will adopt a Complaint management approach which may include, but is not limited to, one or more the following possible options:
- The Company will provide the Complainant with information or explanation related to the underlying problem;
 - The Company will collect and evaluate information on the product, service, individual or other matters related to Complaint;
 - The Company will examine the issues raised in the Complaint.

The Company will keep the Complainant updated regarding the progress of the matter, especially if there are any complications and delays. Each matter will be evaluated separately, and the best resolution for resolving the matter, if at all possible, will be introduced according to all statutory requirements.

4.3 Upon making a decision on the potential resolution, the Company will reach out to the Complainant and inform them on the following:

- An overview of the Complaint;
- Issues which have been considered in the investigation;
- Outcome of the investigation;
- The possible resolution for the issues raised in the Complaint and measure which has been taken;
- Motivation for the suggested possible resolution;
- The timeframe for the customer's acceptance or non-acceptance of the proposed resolution;

- Other possible options for examination that may be open to the Complainant;
- the Complainant's right to lodge a Complaint to the Competent Authority, if unsatisfied with the proposed resolution.

4.4 The final step is to close the Complaint and retain records of the Complaint

For each Complaint the Company will retain the following information:

- The assigned reference number;
- The Complainant's name and surname;
- Demographics (gender, age etc.)
- The Complainant's trading account number;
- The affected transaction numbers, if applicable;
- The date and time that the issue arose and on which the Complaint was lodged;
- Acknowledgement of the receipt of the Complaint;
- An overview of the Complaint and all materials associated with Complaint;
- Information about involved employees;
- The assigned employee responsible for handling the Complaint;
- Detailed information on the internal and external interactions;
- Course of measure which has been taken;
- Reached resolution;
- Complaint closure date.

After completion of the Complaint handling procedure, the Company shall preserve every written or electronic document related to the Complaint for a period of seven (7) years. The Company shall be entitled to prepare statistics and reports about Complaints, to improve the efficiency of Complaint management.

5. REMEDIES

The Company may make use of the following possible remedies as a result of infringed rights:

- Apology;
- Reimbursements and refunds;
- Disciplinary action against the Company's employees;
- Technical support;
- Further details or information;
- Reward;
- Any other support necessary as determined at the sole discretion of the Company.

6. TIMELINES

The company shall provide the Complainant with a response within 21 calendar days. For grossly complicated Complaints, the timeframe may be extended to 90 calendar days. In such cases, the Company shall inform the Complainant in writing including the timeframe by which the response shall be provided to the Complainant. Generally, the Company aims to resolve the Complaint/grievance within 3 months.

7. PERIODIC REVIEW AND AUDIT

The Company will conduct periodic reviews and audits of the Complaint handling and processing policy to ensure ongoing compliance with regulatory requirements and to identify opportunities for process improvement. These reviews will take place at least annually, and any resulting recommendations will be implemented promptly.

8. CONFIDENTIALITY

All Complaint information will be handled with the utmost confidentiality following any relevant data protection requirements, obligations and applicable laws. To comply with data protection laws and ensure the privacy of all parties involved, the Company will implement the following measures:

- All Complaint records, whether electronic or paper-based, will be stored securely to prevent unauthorized access.
- Access to Complaint data will be limited to authorized personnel based on their role and responsibilities.
- Once a Complaint has been resolved and the required retention period has lapsed, personal data will either be anonymized or securely deleted in accordance with data protection regulations.

All handling and storage of Complaint-related information will adhere to applicable data protection regulations, ensuring that the Complainants' personal data is used solely for the purpose of resolving their Complaints.

9. CONFLICT OF INTEREST

The Company is committed to ensuring that the Complaints handling process is fair, transparent, and free from bias. Employees involved in managing Complaints are required to disclose any potential conflicts of interest, such as personal relationships with the Complainant, financial stakes, or prior involvement in the matter.

If a conflict is identified, the affected employee will be recused, and an impartial individual will be assigned to handle the Complaint to ensure objectivity. Oversight by senior management or the Compliance Officer ensures proper handling of such cases, and employees are regularly trained to recognize, disclose, and manage conflicts effectively. These measures uphold the integrity of the Complaints process and reinforce client trust while ensuring compliance with regulatory obligations.

10. TRAINING AND AWARENESS

Employees undergo training on Complaint handling, which covers policies, regulatory requirements, and communication techniques upon appointment. Biannual training sessions and annual refresher courses ensure staff stay updated on regulatory changes, best practices, and client-focused approaches.

Training effectiveness is reviewed periodically, with feedback from staff and clients used to improve content and delivery. This ensures consistent service quality and compliance with regulatory obligations.

11.CONTACT US

If you have any questions, or would like further information about our Complaints handling process, please contact us by email at sc.compliance@b2prime.com

12.SUBMISSION OF COMPLAINTS TO THE FSA

A Complainant may report their Complaint with the Financial Services Authority Seychelles. Further information as to the procedure such Complainant needs to follow can be found on <https://fsaseychelles.sc/complaint-handling>

Regulatory Authority Contact Details:

Name: The Seychelles Financial Services Authority

Email: complaints@fsaseychelles.sc

Mail: The Chief Executive Officer, CC Policy (Information & Communication Unit), FSA Seychelles, PO Box 991, Bois De Rose Avenue, Victoria, Mahe, Seychelles

Phone: +248 4380800

Website: <https://fsaseychelles.sc/>

13.AMENDMENTS

This policy may be amended at any time. If any material changes are made, a notice of such changes will be published on the Company's website. Any revised policy will be effective immediately upon posting on the Website.

The latest and prevailing version of this policy will at all times be available on the Company's website.

The date of this latest version of the Complaint Handling and Processing Policy is 1 March 2025.



Appendix 1

COMPLAINT FORM

Method of Communication:	☐ EMAIL	☐ REGISTERED POST
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Client Details				
Name:		Surname:		
Legal Entity Name:				
Account Number:				
Address:				
Post Code:		City:		Country:
Telephone Numbers:	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):				



B2PRIME

Please enclose any other relevant documentation that may help us to handle the Complaint.	
Signature:	Date:

**For internal use only**

Complaint received by:

Date of reception: / /

Reference number:

Department involved:

Employee involved:

Initial response to client: Yes, No Date: / /

Initial Action Taken:

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Informed client of initial action taken: Yes, No Date: / /

Further Action Taken: Yes, No Date: / /

Further Action Taken:

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File handed on to Compliance Officer: _Yes, No Date: / / Settlement of
complaint: _Yes, No Date: / /

Summary of how the complaint was settled:

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Signature of responsible Officer: Date: / /