MULA MARKETS (PTY) LTD

FSP 53319

An authorised Financial Services Provider rendering intermediary services in respect of Category I Derivative Instruments (Cat A).

COMPLAINTS RESOLUTION POLICY

Introduction and Objective

Mula Markets (Pty) Ltd ("Mula", "we", "us", "our") is committed to a high service standard, rendering financial services with integrity, resolving complaints speedily, and continuously improving our processes — even where a complaint may be considered 'invalid' in terms of our mandate or policy wording. Every concern raised is valuable feedback that we address in a meaningful way.

The objective of this policy is to formalise the process by which dissatisfaction is lodged, acknowledged, investigated, resolved, and used to drive overall improvement. This policy applies to Mula's licensed activities, being intermediary services in respect of Category I Derivative Instruments (Cat 1) offered in conjunction with AT Global Markets SA (Pty) Ltd, trading as ATFX Connect (FSP 44816), the licensed OTC Derivatives Provider and principal counterparty to client trades ("the ODP Provider").

Every staff member receives training on this policy. It is made easily accessible to clients, is reassessed regularly by senior management, and improvements are actioned as a result of client feedback. Treating Customers Fairly (TCF) considerations, particularly around complaints handling, form part of every relevant employee's performance evaluation.

Important guiding material and bodies include the six TCF Outcomes, the Financial Sector Conduct Authority (FSCA), the FAIS Ombud, and the rules and codes of conduct applicable to Category I FSPs under the FAIS Act.

The Treating Customers Fairly (TCF) Outcomes

- Customers need to feel confident that TCF is central to our culture.
- Products and services are designed, marketed, and sold to the right customer, meeting their needs.
- Customers receive clear information that is timely and relevant to them.
- Customers receive suitable advice that takes their circumstances into account.
- Products and services perform as expected, and the service is of an acceptable standard.
- There are no unreasonable barriers for customers to change or switch products, or to complain.

The Definition of a Complaint

A complaint means an expression of dissatisfaction by a person to Mula, or to Mula's knowledge, to the ODP Provider, relating to a financial service or product provided or offered, which indicates or alleges — regardless of whether it is submitted together with or in relation to a client query — that:

- Mula or the ODP Provider has contravened or failed to comply with an agreement, a law, a rule, or a code of conduct binding on Mula or to which it subscribes;
- Mula or the ODP Provider's maladministration, or a wilful or negligent action or failure to act, has caused the person harm, prejudice, distress, or substantial inconvenience; or
- Mula or the ODP Provider has treated the person unfairly.

Note that there is no service fee for registering a complaint.

The Definition of a Complainant: Who May Complain?

A complainant is a person who has a direct interest in the service, or someone acting on behalf of such a person — for example, a client, an authorised representative of a client, or a potential client whose dissatisfaction relates to an application, marketing, or advertising material.

Outcomes of a Complaint

Rejected

The complaint was rejected, and Mula regards it as finalised after advising the complainant that no further action will be taken. A formal written response with reasons will be sent. There are two variations:

- Invalid: the complainant does not accept or respond to proposals to resolve the complaint within 7 days, including not being reachable by phone, SMS, or email where applicable.
- Unjustified: the mandate has been met, the complainant has been treated fairly, there is no basis to assist the complainant, and the complainant refuses to accept the outcome of the assessment.

Upheld

The complaint was successful, either wholly (the complainant received exactly what they sought) or partially (Mula and the complainant found middle ground). There are two variations of an upheld complaint:

- Compensation payment: to compensate the complainant for a proven or estimated financial loss caused by Mula's wrongdoing — either contractually due, or not contractually due but paid due to poor handling on Mula's part.
- Goodwill payment: the complainant has no contractual claim, but Mula chooses to assist due to extraordinary circumstances.

Categories of Complaints

Complaints we handle under this policy may relate to:

- The design of a trading account, mandate, or related service;
- Information provided to clients, or a lack of information or feedback;
- Advice provided by a representative or Key Individual;
- Account or platform performance and servicing, including negligence;
- Administrative services, such as deposits, withdrawals, or trade execution;
- Account or platform accessibility, or the ability to switch or close an account;
- Complaints handling itself (a complaint about how a complaint was handled);
- Complaints relating to CFD or Forex transactions, execution, or disclosure;
- Other complaints not covered above.

How to Lodge a Complaint

If you feel any of the above could have been handled better by Mula, here is how to lodge a complaint:

a) When logging your complaint, include all relevant information for a speedy resolution — the staff member(s) involved, your account details, any supporting documents, and the relevant dates and times. Please state clearly the reason for your dissatisfaction so Mula can investigate diligently.

b) Send your complaint to the contact details provided below. Complaints logged by telephone will be reduced to writing by the person assigned to your complaint.

c) You will receive confirmation that your complaint has been received, the name of the person handling it, and confirmation that they will contact you within two working days.

The Internal Complaints Handling Process

Upon contacting you, the person handling your complaint will introduce themselves and:

- i) Ask what your preferred outcome would be. Please refer to the outcomes described above, but don't be limited by the terminology — we will listen to your reasons for dissatisfaction.
- ii) Answer any questions to the best of their ability.

- iii) Request your availability and preferred communication method for follow-up (email, phone, SMS).
- iv) Advise you to expect feedback within 7 days, or 3 days where time is of the essence.
- v) Diarise the file for 7 or 3 days to provide feedback, while commencing the investigation immediately.
- vi) Request your cooperation in providing copies of relevant evidence and correspondence.
- vii) Where the matter remains unresolved after feedback has been given, diarise the file to provide feedback every 14 days thereafter.
- viii) You may escalate the matter internally and request a change of the person handling your complaint if the diary period above is not met — simply follow the same steps and advise that you wish to escalate.

Complaints Escalation and Review Process

If you remain dissatisfied with the outcome of your complaint after our internal process, you may escalate it as follows:

Where your complaint concerns Mula's conduct as an authorised Financial Services Provider or its representatives, you may lodge a complaint with the FSCA (Financial Sector Conduct Authority) online at www.fsca.co.za/Pages/Contact-Us.

Alternatively, you may lodge a complaint with the FAIS Ombud. A complaint form can be downloaded from the FAIS Ombud's website (www.faisombud.co.za) or obtained directly from the Ombud at the contact details below.

- Tel: 012 762 5000 / Sharecall 086 066 3274
- E-mail: info@faisombud.co.za
- Address: 11th Floor, Menlyn Central Office Building, 125 Dallas Avenue, Waterkloof Glen, Pretoria
- Website: www.faisombud.co.za

You must refer a matter to the FAIS Ombud within six months of the date of Mula's final response to you. The FAIS Ombud's monetary jurisdictional limit is currently R3,500,000.

Mula Markets Contact Details

Mula Markets (Pty) Ltd — FSP No. 53319

Physical Address: Suite 38, 5th Floor, Katherine & West, 114 West Street, Sandton, 2196, South Africa

Email: compliance@mula.co.za

Tel: 066 170 9442

Postal Address: Suite 38, 5th Floor, Katherine & West, 114 West Street, Sandton, 2196, South Africa