

Complaints Handling Policy

Updated · 28th July 2022

1. Introduction

This Complaints Handling Policy (hereafter referred to as the “Policy”) defines the principles that apply to NAGAX Europe OÜ (hereafter referred to as the “NAGA” and/or the “Company”), a company incorporated under the laws of Estonia with License No. FVT000428. The purpose of this Policy is to define the arrangements employed by NAGAX for the reasonable and prompt handling of complaints. The Company will act in accordance with the best interests of its clients and will ensure it has appropriate systems and controls in place so that its clients, including potential clients, have access to adequate complaints handling and redress mechanisms that are accessible, independent, fair, accountable, timely and efficient. For the purposes of this Policy, Complaint shall mean an expression of dissatisfaction by a client regarding the provision of investment and/ or ancillary services provided to him/her by the Company. This is to allow the Company to resolve and apply mandatory measures to avoid any recurring issues.

2. General Principles

This Policy shall follow the undernoted principles:

- fair treatment of clients;
- complaints raised by clients are dealt with courtesy and on time;
- clients are fully informed of avenues to escalate their complaints and their rights to alternate remedy if they are not fully satisfied with NAGAX’s response to their complaints;
- the Company will treat all complaints efficiently and fairly as they can damage NAGAX’s reputation and business if handled otherwise;
- the Company’s employees must work in good faith and without prejudice to the interests of the clients.

Considering the above, the Company shall:

- establish and maintain a complaint handling procedure for clients or potential clients, which shall provide clear, accurate and up-to-date information about the complaints-handling process;

- publish the details of the process to be followed when handling a complaint, including information about the complaints management procedure and the contact details of the complaints management function, to be provided to clients or potential clients, on request, or when acknowledging a complaint.
- establish a complaints management function within its Compliance Department of the Company which enables complaints to be investigated, analysed and resolved;
- communicate to clients in plain language that is clearly understood and provide a response to the complainant without any unnecessary delay;
- explain to the client or a potential client, NAGAX's position on the complaint and set out the client's or potential client's options, where relevant, that they may be able to take civil action;
- ensure its complaints management function shall analyse complaints and complaint-handling data to ensure that they identify and address any risks or issues.

3. Collection of Information

In order to file a complaint, a client shall submit the complaint through by sending it through an email to compliance@nagax.com.

The following information should be provided to and recorded by the Disputes Resolution Officer, whenever possible, so as to make sure that the complaint is expedited in the most efficient and fair way for the best interest of the client:

- a) Full name of the client;
- b) Account Number;
- c) Date when the issue and/or problem first took place;
- d) Short summary of the complaint;
- e) Disputed amount and currency; and
- f) Provide any other document or otherwise relevant to the complaint.

Only duly completed and submitted complaints accompanied by adequate supporting evidence (as necessary) will be recorded as a Complaint by the Company and will be handled as such.

When the Disputes Resolution Officer receives the client's complaint then a written acknowledgement will be sent to the client within seven (7) business days.

The Company will aim to provide a final response to your complaint within thirty (30) business days, however in case we are still not in a position to resolve the issue then the Disputes

Resolution Officer will notify you in writing stating the reasons for the delay and indicate an estimated time to resolve the issue.

In any case, a final response should be provided to the client within sixty (60) business days the latest from the date he submitted his complaint. Furthermore, should a client fail to reply to any communication from the Company (including Company's final response) for a period of greater than one (1) month, the Company will consider the Complaint time-barred and closed.

4. Disclaimer

All of the above do not apply in case when the client owes money to the Company.

In a case such as the above, the Company reserves its legal rights to initiate legal proceedings against the client, to recover any debts owed.

Also, nothing set forth herein shall prevent either party from applying to the competent Court for any of the interim or injunctive reliefs.

Each party acknowledges that a breach of the provisions set out herewith may cause the other party irreparable injury and damage and, therefore, any such breach may be enjoined through injunctive proceedings, in addition to, any other rights and remedies that may be available to either party as per applicable laws or in equity.

5. Review and monitoring of this Policy

The Compliance Function monitors the effectiveness of this Policy and complaint management procedures as part of its compliance monitoring programme. This Policy is reviewed periodically and no less than annually, to ensure that it continues to meet NAGAX's regulatory and compliance obligations.

v.1 - July 2022