COMPLAINT HANDLING POLICY

EQUITEX CAPITAL LIMITED

COMPLAINT HANDLING POLICY

Equitex Capital Limited (hereinafter the "Company") aims to provide superior services to all of its clients.

The Company appoints the Director to efficiently ensure the proper handling of complaints, in accordance with the Financial Consumer Protection (Complaint Handling) Regulations 2024.

This Complaint Handling Policy has been developed to ensure that all complaints are received, addressed and resolved in a fair, prompt, and transparent manner, in order to prevent any recurring issues.

Definitions

The Company classifies complaints as follows:

- Complaint: Any objection and/or dissatisfaction that the client may have with regards to the provision of the products or services provided by the Company or the conduct of the Company in the provisioning of products or services. A complaint form is enclosed at the end of this policy.
- Frivolous Complaint: A complaint which has no serious purpose or value.
- Vexatious Complaint: A complaint from which it is apparent that the complainant is pursuing the matter without merit and with the intention of causing inconvenience, harassment, or unnecessary expenditure.

Company's Internal Escalation Procedure

The Director shall be responsible for overseeing the proper handling of client complaints, except in the case where the complaint involves the Director, whereby the complaint shall be handled by the Representative Officer.

1. A client may lodge a complaint by completing the complaint form using any of the following methods:

   - **By post**:
     Equitex Capital Limited, CT House, Office 9A, Providence, Mahé, Seychelles
   - **Telephone**: (*+248) 437 98 48*
   - **Email:** *compliance@bullwaves.com*
   - **Webpage**: *https://www.Bullwaves.com*

2. When the Company receives the client's complaint then a written acknowledgement will be sent to the client within two (2) business days.
   The acknowledgement will include:
   a) the timeframe by when the client will receive the Company's response;
   b) details of a designated person to contact regarding the complaint; and
   c) reference number for the complaint.

3. A response will be provided within twenty-one (21) business days. For grossly complicated complaints requiring extended investigation, the client will be informed in writing, with an extended timeline of ninety (90) business days.

4. In the case where the client is still not satisfied with the Company's final response, then the client can refer his complaint with a copy of the Company's final response to the Financial Services Authority (FSA / Competent Authority) in Seychelles for further examination.

Escalation to the FSA

Prior to relaying the complaint to the FSA

1. In order for the client to be able to contact the FSA for further examination of the complaint, it is required to demonstrate to the FSA that all possible options have been exhausted to resolve the matter directly with the Company. For this purpose, the client should follow the Company's escalation procedure as indicated above for the investigation of the complaint by the Company before lodging a complaint to the FSA.

2. It is further noted that the FSA will not attend to any complaint unless the Competent Authority is satisfied that the matter has been brought to the attention of the Company and both parties have failed to reach a mutually agreeable solution on the matter.

Lodging the complaint to the FSA

The contact details for the Financial Services Authority (FSA) in the Seychelles are set out below:

	PO Box 991
Address:	Bois de Rose Avenue
	Roche Caiman Victoria, Mahe, Republic of Seychelles
Phone:	(+248) 438 08 00
Fax:	(+248) 438 08 88
Website:	https://fsaseychelles.sc/complaint-handling

Client Records

The client shall provide all relevant documentation as well as any additional information requested by the Company in order to ensure that all records/information are collected and the complaint is properly resolved on time.

All records shall be kept safe as per local requirements and for a period of seven (7) years. The Company will provide all complaint-related information to the Competent Authority within one (1) business day from the date of receiving the request from the Competent Authority.

Consumer Awareness

The Company will provide clear information on complaint-handling procedures to all clients at the time of onboarding and ensure that this information is readily available through written publications e.g. leaflets, the Company website, and other accessible media.

Discrimination against clients who have lodged complaints

The Company will not penalize or discriminate against clients who exercise their rights by lodging complaints.

Confidentiality and Conflict of Interest

The Company will maintain strict confidentiality when handling all clients' complaints. Complaints involving a conflict of interest will be handled by a designated independent officer.

[The complaint form can be found on the next page]

Complaint Form

A. Client Information:

Name:	Account Number:
Address:	Telephone Number:

B. Type of Complaint

1. Execution of Orders	☐
2. Quality or lack of information provided	☐
3. Terms and Conditions/Fees/Charges	☐
4. General admin/Client Services	☐
5. Unauthorized business being offered	☐
6. Issue in relation to withdrawal of funds	☐
7. Other (specify)	☐

C. Brief Summary of the Complaint:

Please describe the product or service you are complaining about (*description, evidence, amount and suggested way to be solved):*

_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

- *Please enclose any other relevant documentation that may help us to handle the complaint.*
- *Possible documentation to be provided (client statement, correspondence with the Company as well as any other supporting documentation to be requested by the Company which is relevant to the client's complaint)*

_____ _____

Date and place Client Signature

For internal use only:	
Complaint Received by:	Date:
Acknowledgement sent to Client:	□ Yes - □ No
Informed Client of initial action:	□ Yes - □ No
Final response provided to Client:	□ Yes - □ No
Holding response provided to Client:	□ Yes - □ No - □ N/A
Compliance Officer Notified by:	Date: