

November 2025

License no. GB25204451

AddUp Markets Ltd

# Customer Complaint Handling Policy

**AddUp Markets Ltd** (hereinafter referred to as the "**Company**") is a Company incorporated in the Republic of Mauritius with registration number 226296 and authorized and regulated by **Financial Services Commission of Mauritius ("FSC")** as Investment Dealer (full-service dealer, excluding underwriting) under license number GB25204451 and Global Business License number GB25204451 dated September 17, 2025. Operating under the Securities Act 2005, the Securities (Licensing) Rules 2007, Financial Services (Consolidated Licensing and Fees) Rules 2008 and Financial Services Act (referred to as the "Legislation").

This Policy has been established to comply with relevant laws, regulations, and industry standards of Mauritius to establish and maintain effective and transparent procedures for the prompt, fair, and consistent handling of client complaints and to publish a description of those procedures. Accordingly, the Company adheres to a robust framework for resolving client Complaints, encompassing clear procedures for Complaint submission, timely investigation, and a consistent and fair resolution process. Implementing this Policy will not detract from the obligation to comply with any other applicable local law, and nothing in this Policy authorises acts prohibited or restricted by law. The Company maintains full cooperation with law enforcement and regulatory authorities in Mauritius and abroad in the event of investigations or inquiries.

This Policy is approved by the company's Management Board and shall remain in force until amended or revoked by proper authority. It is effective from the moment of its approval. All Company employees are required to comply with its provisions.

## **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. Purpose, Principles and Aim of Policy**

By fostering a supportive relationship with its clients, the Company aims to stand by clients and ensure their voices are heard. This Policy aims to create a reliable mechanism that allows clients to easily raise their concerns and ensure the Company addresses and resolves issues promptly and satisfactorily. Through the implementation of these procedures, the Policy strives to:

- Respond promptly to inquiries and concerns raised by Complainants, acknowledging and addressing issues without undue delay.
- Enhance client trust in the complaint management process by being transparent and fair.
- Provide actionable feedback based on the insights gained from complaints to improve the quality of services, products, and internal processes.

Key principles underpinning the Company's approach to complaint resolution include:

- **Efficiency** – Prioritizing timely resolutions to client concerns and handling each Complaint promptly within reasonable timeframes.

- **Confidentiality** – Safeguarding all Complainants' privacy and personal information throughout the complaint process.
- **Transparency** – Offering clients clear guidance on how to file Complaints and keeping them informed at each stage of the process.
- **Fairness** – Ensuring an impartial and consistent approach in handling all grievances, so that similar cases are treated in a similar manner unless there are objective reasons to differentiate.
- **Regulatory Compliance** – Adhering to FSC regulations and recommendations in every aspect of Complaint management and complying with Mauritius national regulations and World best practices.

### 3. Complaints Handling Team

Ensuring adequate resources for effective Complaint handling is a key commitment of the Company, and we prioritise processes free from conflicts of interest in dealing with Complaints. The allocation of resources for addressing Complaints considers the nature and scale of the Company's services, the volume of Complaints, and the complexity of issues typically raised. The Company dedicates human and technical resources to manage and monitor Complaints, ensuring each is recorded, evaluated, and addressed within a reasonable timeframe. Communication with Complainants is conducted in clear and accessible language to foster understanding throughout the process.

#### First level:

Complaints will be managed by the **Complaints Handling Team** led by the complaints handling coordinator (the '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 [complainants@addup.net](mailto:complainants@addup.net). The team will be responsible for the day-to-day management and resolution of complaints.

The Team comprising professionals from relevant departments (Client Support and Operations). This Team possesses the necessary skills, experience, and qualifications to ensure that Complaints are reviewed impartially and resolved promptly. Team members approach every grievance with professionalism and fairness, and receive training to stay up-to-date on best practices and regulatory requirements.

The composition and responsibilities of the Complaints Handling Team are as follows:

i. **Customer Support Team** – This team is the first line for Complaint handling. It is responsible for the initial review and investigation of Complaints before escalation to the CO for final evaluation. Their responsibilities include:

- Conducting a detailed review of each Complaint, analysing the content, and identifying the key issues and client concerns raised.
- Filtering technical complaints from all the others. The technical complaints are dealt with by the IT department (Operation Team).
- Gathering and verifying all relevant documentation or information from the client and internal sources to ensure the Complaint file is complete. In line with the once-only principle, complainants will not be asked to resubmit information to which the Company already has access.

- Coordinating with the Operations Team if technical issues or platform functionality are implicated in the Complaint, to ensure such issues are properly investigated and resolved.
- Maintain communication with the Complainant throughout the process—confirming receipt of the Complaint, providing interim updates on the status when appropriate, and ensuring the client is informed of progress.
- Providing the Complainant with a clear and comprehensive final response (subject to review by the CO), including the outcome of the investigation, any remedial actions taken, and information on further steps or remedies available to the client.
- Identifying any patterns or recurring issues in Complaints and reporting such trends to the CO for potential systemic fixes (e.g., if multiple Complaints suggest a similar root cause).

ii. **Operations Team** – This team is consulted for Complaints that involve technical or operational aspects of the Company’s services (for example, issues with the trading platform, transaction execution, system errors, or other IT-related problems). The Operations Team’s duties in the context of complaint handling include:

- Investigating any technical issues reported in a Complaint to diagnose the root cause of any malfunction or service disruption.
- Implementing prompt resolutions or fixes for service-related problems, and providing information on the resolution to the Customer Support Team so the client can be informed.
- Communicating with the Customer Support Team and/or directly with the Complainant (as needed) to clarify technical issues and the steps being taken to address them, including expected timelines for a solution.
- Proposing and implementing long-term improvements or safeguards to prevent the recurrence of identified technical issues, and reporting these actions to the CO for oversight.

The structure of responsibilities and the delegation of authority in the complaints management process are periodically reviewed (at least once a year) to ensure they remain effective and appropriate. The Company also provides training programs to employees involved in complaint handling to keep them up-to-date with their roles, responsibilities, and any new regulatory developments.

## **Second Level:**

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

Additionally, key responsibilities of the CO include:

- Receiving, registering, and acknowledging incoming Complaints within the required timeframes, in compliance with regulatory standards.
- Supervising the investigation and review process by overseeing the work of the Customer Support Team and Operations Team to ensure thorough fact-finding and consistency with internal policies and legal obligations.

- Monitoring the overall efficiency of the complaint-handling procedures and recommending improvements or corrective actions when necessary.
- Reporting to senior management (Board Members) on a regular basis (at least annually, and immediately in case of any serious issues) with details on the implementation and effectiveness of the complaint handling process, including any identified deficiencies and remedial measures taken. As the person responsible for complaints, the CO reports directly to the Company's Board Members on the status of Complaint handling, including data required by regulators, and escalates significant issues as needed.

### **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
<i>*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.</i>	
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.

#### Contents of the complaint

Clients are required to submit their Complaint in writing along with the following information to facilitate a thorough review:

- **Complainant Details:** Full name (and for legal entities, the legal name and registration number), address of residence or registered office, and contact information (telephone number and email address) for the Complainant. If the Complainant has a Client reference number or Account number with the Company, this should also be included for identification purposes.
- **Representative's Details** (*if applicable*): If the Complaint is submitted by a representative of the Client, provide the representative's name and contact details, and a description of the representative's authority (with supporting documentation such as a power of attorney).
- **Description of the issue:** A clear description of the matter being complained about, including relevant dates, transactions, product or service involved, and

the names or departments of any Company staff involved (if known). The Complainant should explain what they believe went wrong or how they were dissatisfied with the service.

- **Relevant reference numbers:** If the Complaint involves a specific transaction or order, include any relevant transaction ID, order number, or crypto-asset wallet address involved. Also include the reference of the crypto-asset service or agreement to which the Complaint relates (for example, the contract or service name).
- **Desired resolution:** (Optional) The Complainant may state what outcome or action they seek from the Company (e.g., a correction to an account balance, an apology, a change in procedures, etc.). While the Company cannot guarantee that the requested resolution can be met, understanding the Client's expectation helps address the issue.
- **Supporting evidence:** Any documents or evidence that support the Complaint, such as screenshots, copies of communication, error messages, bank statements (if relevant to a payment issue), etc. This will help the Company investigate the issue more quickly.

All Client Complaints must be submitted in writing via email or post as per details below and should be as descriptive as possible in respect of the events that led to the filing of the Complaint.

The Company reserves the right not to formally review or to require re-submission of verbal Complaints or claims missing significant details required the above (e.g., date of the event, affected positions, and requested compensation amount).

The Client may submit a Complaint by communicating it via any of the following options:

- Email: [complaints@addup.net](mailto:complaints@addup.net), or
- Postal Address: Office 306, 3rd floor, Ebene Junction, Rue de la Democratie, Ebene 72201, Republic of Mauritius.

The Company will acknowledge receipt of the Complaint via email within 5 working days of receiving the Complaint. The acknowledgement will include the following:

- a unique reference number or ID assigned to the Complaint (for tracking purposes)
- a reference to the applicable timeline for handling the Complaint – i.e., an indication of how long it may take to investigate and send a final response, including relevant regulatory deadlines.
- The identity and contact details of the person or department handling the complaint. This will typically include the name or title of the responsible within the Client Support and a direct phone number or email that the Complainant can use for any queries related to the Complaint.
- Confirmation that the Complaint is being investigated and that the Complainant will receive a final response once the investigation is completed.



If not already provided to the client, a copy of (or link to) this Complaints Policy or a summary of it, so that the Complainant is fully aware of the process and their rights.

The Company may contact the client to request further details or clarification, if necessary. Once all relevant information has been collected, the Company will provide a written response within twenty one (21) working days from the date of initial acknowledgement. In particularly complex cases that require additional clarification or evidence, this period may be extended — however, it must not exceed 60 calendar days. In such a case, the Company will inform the Client of the reason for the delay and provide a new target date for the final response.

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](mailto: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.