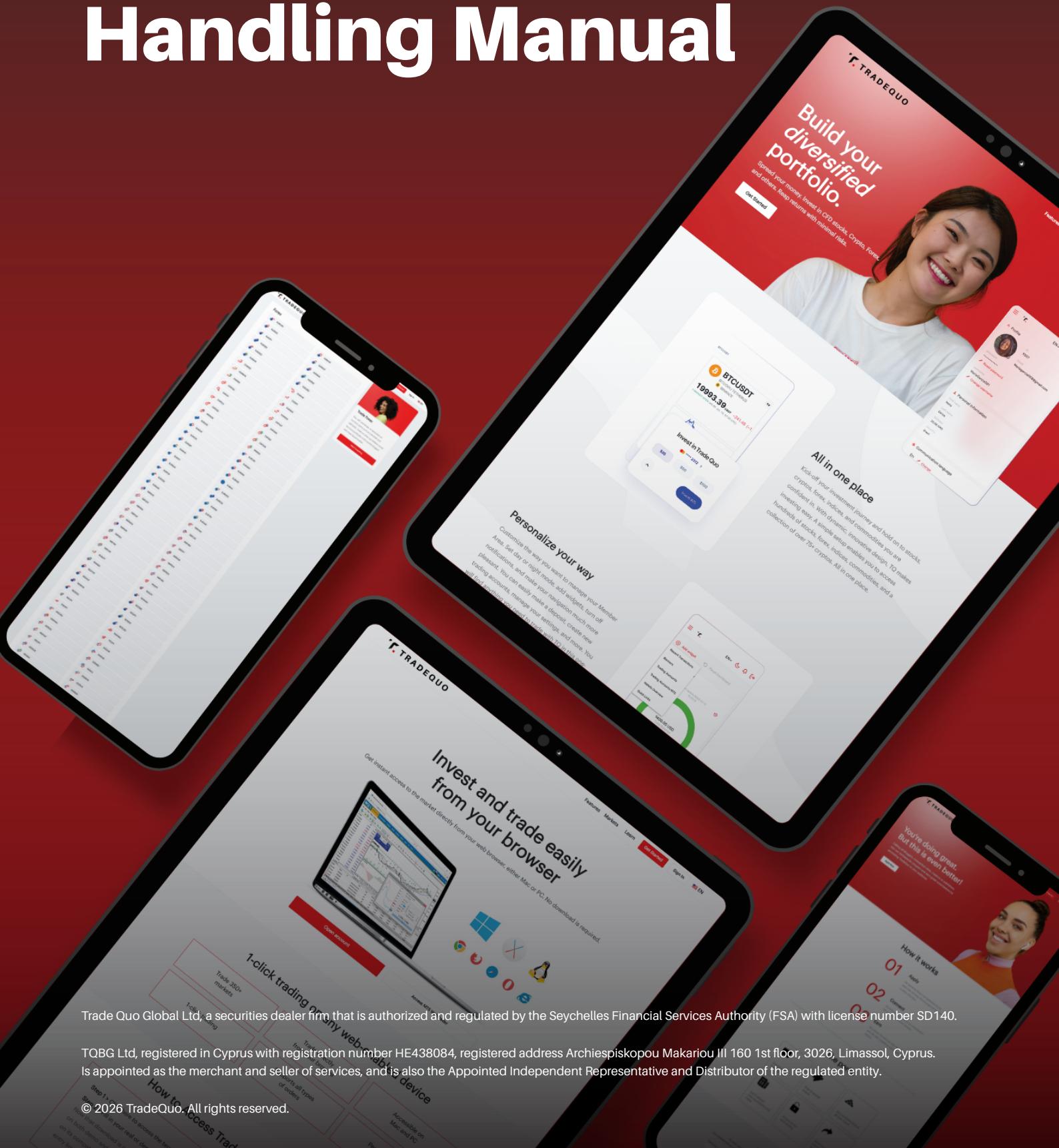


Complaint Handling Manual



Trade Quo Global Ltd, a securities dealer firm that is authorized and regulated by the Seychelles Financial Services Authority (FSA) with license number SD140.

TQBG Ltd, registered in Cyprus with registration number HE438084, registered address Archiespiskopou Makariou III 160 1st floor, 3026, Limassol, Cyprus. Is appointed as the merchant and seller of services, and is also the Appointed Independent Representative and Distributor of the regulated entity.

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COMPLAINT HANDLING MANUAL / INTERNAL PROCEDURE

1. INTRODUCTION

Trade Quo Global Ltd (the "Company") has established this internal Complaint Handling Manual to provide a structured framework for addressing client complaints effectively, consistently, and in compliance with regulatory requirements. It serves as a reference guide for employees, ensuring that all complaints are handled professionally, fairly, and transparently.

2. PROCESS OF COMPLAINT HANDLING AND REPORTING LINE STRUCTURE

A. Customer Support/ Back Office Department:

- Acts as the first point of contact for clients raising issues/queries
- Resolves straightforward disputes
- In case the queries escalate into a complaint, then shall direct the client to file an official complaint as per the Company's *Complaint Handling Policy*
- Reports to the Representative Officer/Director

B. Back Office, Dealing Department, IT Department:

- Investigate and provide findings
- Report to the Representative Officer/Director

C. Representative Officer/Director:

- Oversight of the complaint handling process
- Handles complaints up to its resolution
- Ensures the relevant departments/persons are involved in the handling of the complaint
- Reports any significant trends to the Board of Directors

D. Compliance Department:

- Ensures complaints are handled in line with regulatory requirements and internal policies
- Ensures complaints are resolved effectively and response is provided to the complainant
- Reports significant complaints, unresolved disputes, or regulatory breaches to the Board of Directors either via the annual compliance report or any ad-hoc report/memo within the year.

3. DISPUTE RESOLUTION PROCEDURE

Many disputes or inquiries can be resolved quickly through clarification or corrective actions. Standard queries or disputes can be received via telephone, email or by any other form of communication as this may be indicated by the Company from time to time via the Company's website. The client must inform the Company as soon as possible about any dispute. The sooner the client informs the Company, the easier it will be to resolve the matter.

In the first instance, the client shall contact the Company's customer support to explain the matter and try to resolve the dispute through the usual customer service channels. It is noted

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that most disputes arise as a result of misunderstandings and can be easily resolved. The client will be requested to provide detailed information about the issue, including, *inter alia*, the date and time of the disputed trade, transaction details, any relevant screenshots, correspondence or other supporting documents. The more information the client can provide, the easier it will be to resolve the matter. Email to be used for queries or disputes is compliance@tradequo.com.

Sample of disputes that could be raised (among others) are listed below:

- Delay on processing deposits or withdrawals
- Delay in activation of trading accounts
- Terms of contract/fees/charges
- Failing to complete specific trade e.g. insufficient funds
- Stop out orders due to margin calls
- Quality or lack of information provided to the client

The Company will endeavor to resolve all such disputes as soon as possible upon receipt of information from the clients but in any event **within 48 hours**.

If the Company is unable to resolve the matter or the client feels that the Company's service has not met his expectations and therefore wishes to make a formal complaint, then the formal complaint may be filed according to the Company's *Complaint Handling Policy* which is communicated to the client upon onboarding and is available at any given time on the Company's website.

4. COMPLAINTS

A. Definition of Complaint

As per the applicable Complaint Handling Regulations pursuant to the Financial Consumer Protection Act, 2022, a **complaint** is defined as the expression of dissatisfaction by the financial consumer (i.e. the client) in respect of the products or services provided by the financial services provider (i.e. the Company), or the conduct of the financial services provider/Company in the provisioning of products or services, and where a response or resolution is expected by the financial consumer/client; and the term "complainant" shall be construed accordingly.

In addition, the Company considers a complaint to be a formally written expression of dissatisfaction using the complaint form provided by the Company. The complaint form is enclosed at the end of this Manual which includes the information that the Complainant would need to provide in the process.

B. Complaints Procedure

The Compliance Officer shall be responsible for overseeing the complaint handling process and ensuring that client complaints are handled appropriately, while the complaint shall be handled by the Company's Representative Officer and/or Director.

The client may register a formal complaint using any of the following options after having completed the complaint form enclosed as **Appendix A**:

- **By post:** Trade Quo Global Ltd, CT House, Office 9A, Providence, Mahé, Seychelles
- **Telephone:** (+248) 437 39 18
- **Email:** compliance@tradequo.com

- **Webpage:** <https://www.tradequo.com>

1. When the Company receives the client's complaint then a written acknowledgement will be sent to the client within 2 business days. The acknowledgement will include:
 - a) the timeframe by when the client will receive a response;
 - b) details of a designated person to contact regarding the complaint; and
 - c) reference number for the complaint.
2. The Company will attempt a final response as soon as possible and in any event within 21 business days from the date of the complaint being lodged.
3. For grossly complicated complaints requiring extended investigation, the timeline above may be extended to 90 business days, and in such case, the Company will notify the client in writing stating the reasons for the extension and indicate the estimated timeframe by which a response shall be provided to the client.
4. In the case where the complainant is still not satisfied with the Company's final response, then the complainant can refer his complaint with a copy of the Company's final response to the Financial Services Authority (FSA) in Seychelles for further examination.

C. Company's obligation to ensure effective handling of complaint

1. The Company shall make available the required resources to ensure the efficiency and effectiveness of the policies, processes and procedures for handling complaints.
2. The Company's employees shall assist the client/complainant in lodging his or her complaint, when requested.
3. Wherever feasible, a complaint shall be investigated on the same day that the complaint is lodged.
4. The Company may accept complaints lodged on behalf of a client/complainant all the while ensuring that the person representing the complainant has obtained the necessary written consent.

D. Prohibition of restrictive practices for lodging complaints

- **Accessible Complaint Mechanisms**

The Company must provide clear, simple, and easily accessible channels for clients to lodge complaints, such as email or written submission options, and allow clients to contact customer support or compliance teams directly for disputes and submission of formal complaints.

- **No Fees or Costs**

Lodging a complaint must be free of charge. Any imposition of fees for filing or resolving complaints is prohibited by the Competent Authority.

- **No Retaliation or Disincentives**

The Company must not engage in practices that discourage clients from submitting complaints, such as:

- Threatening account suspension or restrictions.
- Offering incentives to withdraw or refrain from filing complaints.

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- Engaging in intimidation or discriminatory actions against the complainant.

E. Training of Employees

Effective training of employees, including Directors, to handle disputes and complaints is crucial for ensuring that clients' disputes and/or complaints are addressed professionally, efficiently, and in compliance with regulatory requirements.

Objectives of Complaint Handling Training

- a. To equip employees with the right skills and knowledge to deal with complaints effectively and efficiently and find appropriate solutions for the client/complainant.
- b. To ensure compliance with regulatory standards and internal policies.
- c. To minimize escalation of complaints to external bodies, such as Competent Authorities.

The Company shall ensure that its employees are trained on a regular basis, and at least once every year, on effective management and handling of complaints.

F. 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 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:

Address:	PO Box 991 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

G. Information to be provided after investigation

Following the closure of a complaint, the Company shall provide the following information in writing to the client:

- (a) an overview of the complaint;
- (b) issues which have been considered during the investigation;
- (c) outcome of the investigation;
- (d) any applicable solution and a timeframe for the client to confirm acceptance or non-acceptance of the solution being proposed;
- (e) the client's right to lodge a complaint with the Competent Authority if unsatisfied with the proposed resolution; and
- (f) details of the Competent Authority including the telephone number, e-mail address and postal address.

The written communication referred to above shall be in either Creole, English or French, according to the preference of the complainant.

H. Maintenance of client records

In line with the applicable regulations, the Company shall retain records related to complaints for over a period of 7 years. The records shall contain the information below:

- a) the assigned reference number of the case/complaint;
- b) the name of the complainant and his or her contact details, including email address and country of residence;
- c) client's account status;
- d) the date on which the complaint was lodged and date of incident;
- e) type of product, service and issue raised in the complaint;
- f) demographics (gender, age etc.);
- g) a copy of the biometric page of his passport or national identity card
- h) subject and description of the complaint;
- i) classification of the complaint (as per an internal classification system);
- j) the employee responsible for handling the complaint;
- k) investigation carried out by the Company;
- l) action taken by the Company to resolve the complaint;
- m) response provided to the client/complainant; and
- n) the status of the complaint in the complaint process.

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

I. Provision of information to the Competent Authority

The Company shall provide all complaint-related information to the Competent Authority within 1 business day from the date of receipt of the request from the Competent Authority or as instructed otherwise by the Competent Authority.

J. Consumer Awareness

The Company shall 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.

K. Discrimination against Clients who have lodged complaints

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

L. Confidentiality and Conflict of Interest

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

APPENDIX A

Complaint Form

A. Client Information:

Name:	Account Number:
Address:	Telephone Number:

B. Type of Complaint

1. Execution of Orders	<input type="checkbox"/>
2. Quality or lack of information provided	<input type="checkbox"/>
3. Terms and Conditions/Fees/Charges	<input type="checkbox"/>
4. General admin/Customer Services	<input type="checkbox"/>
5. Unauthorized business being offered	<input type="checkbox"/>
6. Issue in relation to withdrawal of funds	<input type="checkbox"/>
7. Other (specify)	<input type="checkbox"/>

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

<i>For internal use only:</i>	
Complaint Received By:	Date:
Acknowledgement sent to client:	<input type="checkbox"/> Yes - <input type="checkbox"/> No
Informed client of initial action:	<input type="checkbox"/> Yes - <input type="checkbox"/> No
Final response provided to client:	<input type="checkbox"/> Yes - <input type="checkbox"/> No
Holding response provided to client:	<input type="checkbox"/> Yes - <input type="checkbox"/> No - <input type="checkbox"/> N/A
Compliance Officer Notified by:	Date: