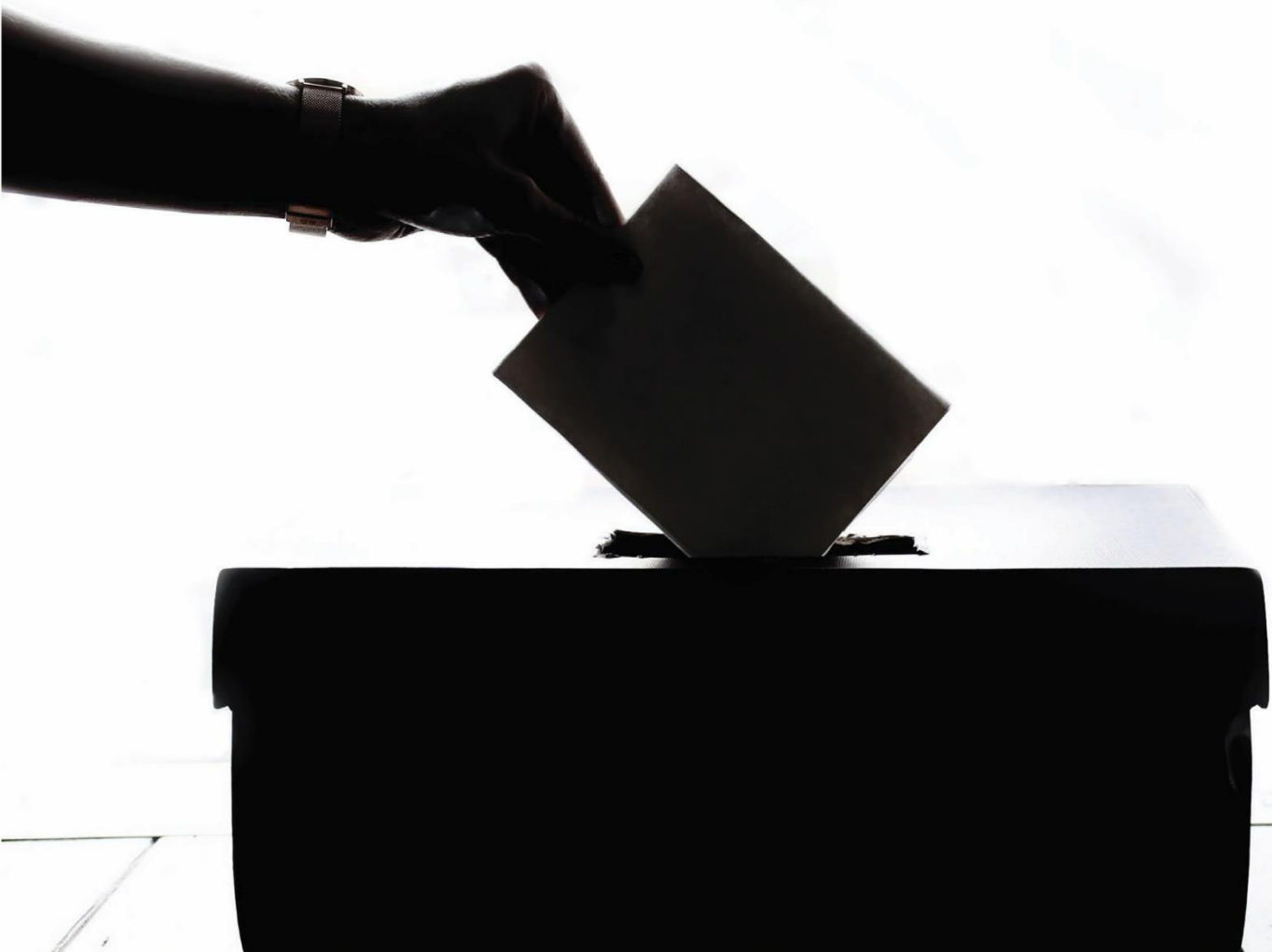


COMPLAINTS HANDLING POLICY



Introduction

XSpot Wealth (EU) Ltd. (hereinafter referred to as the “XSpot” or “Company”) is a Cyprus Investment Firm licensed and regulated by the Cyprus Securities and Exchange Commission (“CySEC”) under license number 235/14 obtained on 26/05/2014. The Company is located at 68 Spyrou Kyprianou, Kato Polemedia, Office 201, 3rd Floor, 4154 Limassol, Cyprus

The Company has adopted this Complaints Policy (the “Policy”) in order to ensure a fair and quick process for handling client complaints (as these are defined below) that may arise from our relationship with clients.

Definition of a Complaint

Under the complaint handling rules, XSpot Wealth (EU) Ltd. shall deal with any expression of dissatisfaction regarding any financial services activity provided or withheld by the Company.

The Company considers important and essential to pay the proper attention to each and every complaint made by a client, irrelevant of the subject matter of the complaint.

Procedure

The Company shall establish a complaints management function responsible for the investigation of complaints. For now, given the small size of the Company, the duties of this function will be performed by the Company’s Compliance Officer. As the volume of the Company’s trading operations, and number of clients, grows, the Company will designate a separate and independent Complaints Handling Officer.

For now, the Company’s complaints management function shall be carried out by the Compliance Department.

In this respect, the Compliance Department shall deal with the clients’ complaints unless it is necessary to involve the Senior Management in order to deal with the complaint.

The Client or potential client who wishes to proceed with filing a Complaint is requested to send either an email to complaints@xspotwealth.com or submit the relevant form which can be found under the Contact Us Section of the website through the platform, detailing the complaint and attaching any supporting evidence. A complaint must include: (i) the Client’s name and surname, (ii) the Client’s Trading Account number, (iii) the Client’s address and email address and (iv) an accurate description of the issue.

- A written acknowledgment from the Compliance Department shall be sent to the client within forty-eight (48) hours confirming receipt of the complaint and the estimated time under which the client shall be given a reply, and providing a unique reference number to the client for the specific complaint in accordance with Circular C100; the Compliance Department shall inform the client that he/she should use the said reference number in all future contact with the Company, the Financial Ombudsman and/or the CySEC regarding the specific complaint.
- The Compliance Department shall register the complaint directly to the Company’s internal register, as soon as possible and in an appropriate manner;
- Within four (4) weeks of receipt, the Company shall send the client a Final Response or a holding response, which will explain why it is not yet in a position to resolve the complaint and give an indication of when further contact shall be made. In such case an answer shall be given within eight (8) weeks of receipt;

- Within eight (8) weeks of receipt of the complaint, the Company shall send to the client either a final response or a response which explains why a final response cannot be given with an explanation as to why and an indication of when the Company anticipates on providing a final response;
- Upon sending the final response, the client shall be given a period of eight (8) weeks to respond. If a response is not received within eight (8) weeks, then the Company shall not be obliged to take the complaint further unless further correspondence is received from the client indicating that he/she is still dissatisfied.
- Please note that the Company shall consider a complaint as closed when a period of three (3) months has elapsed from the date of submission of the complaint and the client has failed to respond to the Company's investigating officer's requests and due to this the investigation cannot be carried forward.

Clients or potential clients can submit complaints to the Company free of charge. When handling a complaint, communication with clients or potential clients shall be clear, in plain language that is easy to understand.

It is understood that Clients' right to take legal action remains unaffected by the existence or use of any complaint's procedures referred to above. In addition, Clients have the right to address their complaints to the Financial Ombudsman of Cyprus, provided that each complaint does not exceed the amount of one hundred and seventy thousand euro (€ 170,000), within 4 months after the Company provides its final response.

If the client does not accept a decision taken by the Financial Ombudsman, he/she may take civil action by taking his/her case to court. Further information can be found on <http://www.financialombudsman.gov.cy>.

Alternatively, Clients may refer their complaint to CySEC's Department of Market Surveillance and Investigations, which however, does not have restitution powers and therefore does not investigate individual complaints.

Records and Reporting

The Company shall keep and continuously update records of all the complaints received by clients with details of the investigation conducted, the final outcome of these, any measures taken for their resolution and all the communication with the clients.

Furthermore, the Company shall report on a monthly basis to CySEC information regarding Client complaints filed to the Company and how these are being handled, as per the requirements of Circulars C100 and C198.

The Company's Compliance Function shall analyse complaints and complaints-handling data and records to ensure that any risks (e.g. legal and operational) or issues (e.g. recurring or systemic problems) are identified and addressed.

Review of the Policy

This policy shall be regularly reviewed and updated by the Compliance Function in line with applicable legislation updates and when considered necessary and each updated version shall be approved by the Company's Board of Directors.

The Company will inform its Clients of any material changes to this procedure by posting the updated version of the policy on its Website.