

COMPLAINT HANDLING POLICY OF XFLOW SPORTS

INTRODUCTION

This document sets out the Complaint Handling Policy of XFLOW SPORTS which is a trading name of XFLOW MARKETS LLC (hereinafter referred to as “**XFLOW**” or “The Company”), incorporated in Saint Vincent and the Grenadines (hereinafter referred to as “**SVG**”) with number 255 LLC 2020.

Introduction

The Company classifies a complaint as any grievance/ dissatisfaction involving the activities of those

persons under the control of the Company (Employees), in connection with the provision by the Company of the investment and/or ancillary services it provides.

The target of the Company is to deliver a consistent, high-quality and accountable response to the complainant.

1. Definitions:

A “Complaint” is a statement of dissatisfaction formally addressed by the Client to the Company regarding the provision of investment and/ or ancillary services provided by the Company.

A “Complainant” is any client which is eligible for lodging a complaint.

Scope: The procedure sets out the method for the submission of complaints with the Company when dealing with complaints received by the clients. The purpose of the Complaint Handling Policy outlines the procedures that are implemented when handling client complaints.

2. Procedure for Handling Client Complaints

2.1 How to file a Complaint:

The Complainant/ Client are able to file a complaint to the Company by sending a written complaint to the Company’s email (service@XFLOW.com). All complaints must be in writing and shall be addressed, in the first instance, to the Customer Support Department. Where the Client receives a response, which does not satisfy him/ her, he/ she has the right to ask Support to escalate the complaint to the Compliance Department. The clients shall provide the following details when submitting their complaints via email or via the complaint Form:

- E-mail to support@xflowmarkets.com.
- The client’s name and surname.
- The clients trading account number.
- The identification numbers of the relevant orders and positions (if applicable).
- The date that the issue arose and the description of the issue.
- The magnitude of the damage claimed by the client.
- The capital and the value of the financial instruments which belongs to the client.
- Reference of any correspondent exchanged between the Company and the client.

2.2 Handling Complaints:

- Upon receipt of the complaint the Client shall receive a formal written acknowledgement within five (5) business days by the Back Office/Account Opening Department. The client will receive an email advising that the complaint has been received and it is under investigation.
- The Company shall register the complaint directly to an internal register, giving it a unique reference number, which will then be sent to the Client.
- The complaint will be investigated and if deemed necessary it will be escalated to the Compliance department where the complaint

is addressed to be further verified and investigated.

- The Company sets 5 business days from the day the original complaint is received as a standard investigation period. If the investigation is complete in less than 10 business days, the complainant will be informed about the results of the investigation immediately upon its completion. However, if a complaint is not resolved within the standard investigation period, the Company shall inform the complainant in details about causes of delay, the status of the investigation process and the expected date of completion of the investigation.

- The events leading to the complaint or grievance and all the information provided by the client, will be examined and assessed in order to reach a fair outcome.

- The client will be informed at all the times by the Company in regards to the handling process of his/her complaint. In particular, the findings and proposed solutions that shall be clearly explained in written form to the client within the agreed time frame.

- The Company has the right to refrain from reviewing a complaint when:

- Ø The complaint does not comply significantly with the format requirements as outlined in Section 3.1 above;

- Ø It does not enable to identify the applicant's identity;

- Ø It includes offensive language directed either to the Company or an employee of the Company.

In such case, the Client will be notified with the reasoning of why the complaint was not taken into process.

3. Review of the Complaints Handling Process

This Policy will be reviewed and/ or amended at annually or as when considered necessary by the board or when changes or amendments to operating requirements are issued by the Commission.

This policy was approved by Vishal Kapoor, Director and Compliance Officer of XFLOW MARKETS LLC, on the 15th of March 2022.