



DXA Capital Investment Services S.A.

Complaints Handling Policy

1. Scope

The provisions of this Policy apply within the framework of effective complaints management and the immediate handling of complaints by Clients or potential Clients regarding the services provided by the Company, and include the mechanism of complaint management implemented by the Company to ensure their effective handling, thereby eliminating exposure to regulatory and legal risks.

A "*Complaint*" is considered to be an expression of dissatisfaction by a client regarding the provision of investment and/or ancillary services provided by the Company.

A "Complainant" is defined as any person, natural or legal, who has read, agreed to, and accepted all the Terms and Conditions of the Company contained in the Client Agreement without modifications, has opened a trading account with the Company, and has submitted a complaint by completing the complaint form.

2. Complaints Management Procedure

A. Client Report

Clients or potential clients may submit any complaints or reports to the relevant Complaints Management Department of the Company (Compliance Department), free of charge, via email at complaints@finnso.com, by submitting the Complaint Form available on the Company's website, or by sending a message to the aforementioned email address with the subject title "Submission of Complaint – Complaint Report" and including at least the following information:

- i. Client's full name
- ii. Client's account number
- iii. Detailed description of the request and any other relevant information
- iv. References to transactions involved in the specific complaint
- v. Date and time when the complained event occurred
- vi. Any document substantiating the content of the complaint.

B. Registering the Report in the Internal Registry

Upon receipt of the complaint, the Compliance Department records the complaint directly in an internal registry, assigning it a unique reference number:

The unique reference number must consist of ten digits:

- the first two digits are the Company's code regarding the Transaction Reporting System - TRS (i.e., "XX")
- The next four digits determine the year, and
- The last four digits indicate the serial number of each complaint (e.g., for 2020 - AA20200001, AA20200002, for 2021 - AA20210001, AA20210002).

C. Sending Initial Response to the Client

The Compliance Department will then:

- i. Send an initial written acknowledgment of receipt of the complaint to the client within seven (7) business days, informing them of the Responsible Officer handling the Complaint and the unique reference number of the complaint.
- ii. Inform the complainant that they must use the unique reference number in all future contacts with the Company and Authorities regarding the specific Complaint.

The Client's Complaint will be resolved as soon as possible and no later than within 8 weeks from the receipt of the Complaint. In cases where more information and investigation are required, and the two-month period is not sufficient, the Company must inform the Client in writing of the reasons for the delay and state the timeframe within which the investigation will be completed. This timeframe cannot exceed three months from the submission of the Complaint.

D. Internal Investigation for the Report

The Compliance Department will thoroughly examine any complaints, in collaboration with other Departments of the Company and the relevant Department to which the complaint/report refers, as required (taking into account any information contained in the Company's books and records, including, for example, the client's investment account), in order to evaluate these fairly and objectively.

E. Submission of Internal Complaints Report to the Board of Directors

Upon completion of the Investigation, an Internal Complaints Report will be prepared by the Compliance Department, stating the facts and submitted to the Board of Directors, which will decide on the official response to the client and the action to be taken.

F. Sending Final Response – Issue Resolution

Upon reviewing the Client's case and completing the analysis of the data of each complaint or report, the Compliance Department communicates in writing to the Complainant the Company's position regarding their complaint. Communication with the Client is done in simple, clear and understandable language.

In cases where the final decision on the Complaint does not fully satisfy the complainant's requirements, the Company must inform the complainant in writing, explaining in detail its position regarding the Complaint and noting that the client's right to take legal action remains unaffected.

Additionally, the Company is obliged to inform the Client about his right to submit his complaint on the [website](#) of the Hellenic Financial Ombudsman or alternatively on the [website](#) of the Hellenic Capital Market Commission as the competent authority in Greece for supervising the Company.

The Head of the Compliance Department will submit a weekly report to the Board of Directors with all Complaints that have not been resolved for a period longer than 10 business days.

All Complaints are treated with confidentiality, discretion, and in compliance with the rules for the protection of clients' personal data.

3. Submission of Information Regarding Complaints to the Regulator

The Head of the Compliance Department is required to prepare on a monthly basis a report with information about the complaints received and how they were handled.

Specifically, the Compliance Department completes each month (reporting month) the relevant form (Excel file, the "Form") and submits it for Submission to the Regulator within five days after the reporting month. The "Form" is sent electronically. In cases where the Company did not receive a complaint during the reporting month, the Company will continue to submit the relevant form to the Regulator, stating that no complaints were received during the respective month, unless no longer required by the relevant legislation.

If the Company has resolved and/or reviewed a complaint submitted to the Regulator, the Head of the Compliance Department must accordingly complete the relevant form.

4. Record Keeping

The responsible department for maintaining records of complaints is the Compliance Department. The records will be kept in a suitable manner, in compliance with the regulations for the protection of personal data, however allowing easy retrieval.

Specifically, a file will be kept for each complaint and for the measures taken to resolve the Complaint.

Additionally, a central file of all Complaints will be maintained, containing the following information:

- Name, address, and account number (if applicable) of the complainant

- Date of receipt of the complaint
- Department(s) involved in the investigation of the complaint, along with the names of responsible employees
- Description of the nature of the complaint
- Assignment of the complaint
- Actions taken to resolve the complaint, and
- Resolution date

The Company is required to retain all Complaints or reports for a minimum period of five years, subject to any regulatory obligation to preserve them for a longer period.

5. Customer Update - Provision of Information

The Compliance Department of the Company ensures that the Company:

- Publishes detailed information about the process in an easily accessible manner (e.g., in advertising material, brochures, or through the Company's website).
- Provides, upon request or upon confirmation of receipt of each complaint, written information regarding the current complaint handling process.

6. Complaint Evaluation

The Company's Compliance Department is responsible for analyzing Complaints and managing relevant information to ensure that any recurring findings or potential systemic issues are identified and addressed (root-cause analysis), thereby eliminating potential legal and operational risks, such as:

1. Analysis of the causes of individual complaints to identify common root causes.
2. Examination of whether these causes may also affect other processes or products, including those that have not been subject to complaint.
3. Implementation of corrective measures, where feasible, and
4. Reporting to the Board of Directors on recurring complaint causes that require action after approval.

If during the analysis of a complaint a violation of the Company's internal policies, procedures, or regulatory obligations is identified, an immediate report is made to the relevant management personnel of the Company.

Additionally, Company's Compliance Department submits an annual report to the Company's Board of Directors on complaint handling, including the results of the above analysis.

7. Policy Review

The Company's Compliance Department reserves the right to periodically review and amend its Policy and regulations as it deems appropriate.

COMPLAINT SUBMISSION FORM

TO: Compliance Department, DXA Capital Investment Services S.A.

Customer Details:

** mandatory completion of all the following details*

*** the details must match those declared at the customer registration*

Full Name / Company Name::	
Address / Registered Offices (street, number, Postal Code):	
Email Address:	
Phone Number:	
Customer Account Number:	

DESCRIBE YOUR COMPLAINT ¹

I declare that I consent to the handling of my personal data by the competent Departments of DXA Capital Investment Services S.A., for the purpose of processing my complaint/report.

I declare that I consent to the Company contacting me by telephone/email.

Athens,/..../.....

Complainant: [Your Name]

IN CASE YOUR DETAILS ARE INACCURATE, YOUR REPORT WILL BE CONSIDERED NOT RECEIVED.

¹ Necessary minimum complaint information:

1. Detailed description of the request and other relevant information
2. Transaction references / individuals involved in the specific complaint
3. Date and time when the alleged incident occurred

To be filled by DXA Capital Investment Services S.A.:

Report Receipt Date:/...../.....

Competent Receiving Department:	
Receiving Employee:	
Unique Reference Number:	
Confirmation of Report Receipt Dispatch Date:/...../.....

Internal Report Investigation

Assignment of Complaint:	
Description of Complaint Nature	
Company Department(s):	
Responsible for Report Handling:	
Participants:	
Actions Taken to Resolve the Complaint	
Resolution Date:/...../.....