COMPLAINTS HANDLING POLICY

May 2026 – Version 1.2

Table of definitions and interpretations

"Board" means the Board of Directors of **HANABI LIMITED**;

"Business Relationship" shall have the meaning set out under Section 2 of the Anti-Money Act 2006;

"Companies Act" means the Companies Act 1972;

"Company" shall mean **HANABI LIMITED** which is formed and registered in the Republic of Seychelles under the Companies Act 1972;

"Complaint" means an expression of dissatisfaction by a financial consumer in relation to the products or services provided by the Company, or the conduct of the Company in the provision of such products or services, where a response or resolution is expected by the financial consumer, pursuant to Regulation 2 of the Financial Consumer Protection (Complaint Handling) Regulations, 2024 issued under the Financial Consumer Protection Act, 2022.

"Complainant" includes a natural or legal person, a company without legal entity or other organization that requires services of the Company or the addressee of information or offer related to the service;

"Customer" shall have the meaning set out under Section 2 of the Anti-Money Laundering Act 2006;

"Employee" means a person employed by **HANABI LIMITED** at non-executive level;

"Person" includes a natural person and a legal person;

"Policy" means **HANABI LIMITED**'s Complaint Handling Policy;

"Republic" means the Republic of Seychelles;

Words importing one gender include all other genders and words importing the singular include the plural and vice versa.

Table of acronyms

CO	Compliance Officer
FSA	Financial Services Authority (Seychelles)

1. Introduction

1.1 **HANABI LIMITED** (the "Company") is required to establish, implement and maintain an effective and transparent Complaint Handling Policy and procedure for the prompt handling of Customers' complaints.

1.2. To ensure the effective management of customer concerns, the Company has adopted this Complaints Handling Policy (the "Policy"), which establishes the principles and procedures governing the fair, consistent, and timely handling of queries, complaints, and disputes submitted by Customers. The Policy is supported by a comprehensive framework of procedures, internal controls, reporting mechanisms, and monitoring arrangements designed to facilitate the effective resolution of complaints. It also outlines the steps Customers should follow when submitting a query and/or complaint to the Company. This Policy shall be reviewed at least annually and updated as necessary to reflect changes in applicable laws, regulations, business operations, or internal governance requirements

1.3. The Company maintains records of all complaints received and the actions taken to resolve them in accordance with applicable laws, regulations, and regulatory requirements.

2. Applicable Procedure for Submission of Queries and Complaints

2.1. Submitting a Query

2.1.1. 1. Where a Customer has a question concerning their account or is dissatisfied with any aspect of the Company's products or services, the Customer should first contact the Company's Customer Support Department through one of the official communication channels made available by the Company, including email, live chat, telephone, or any other approved method of communication. Most queries and concerns can be addressed and resolved at this stage.

2.1.2. The Company's Customer Support Department will make every reasonable effort to address and resolve the Customer's query upon receipt. Where immediate resolution is not possible, the Company will continue to investigate the matter and aims to provide a response within three (3) business days. If additional time is required to complete the review, the Company will provide the Customer with a written interim response explaining the delay and outlining the expected timeframe for further updates regarding the investigation and its outcome.

2.1.3. If the Customer remains dissatisfied with the final response provided by the Customer Support Department, the matter may be escalated by submitting a formal complaint in accordance with the procedure set out in Section 2.2, "Submitting a Complaint".

2.2. Submitting a Complaint

2.2.1. Further to the above, any Customer who is not satisfied with the final response received by the Customer Support Department and would like to raise a query further, may submit its complaint in writing to the dedicated email which is: complaints@hanabimarkets.co

2.2.2. The Company may accept complaints submitted by a third party acting on behalf of a Customer (an "Authorised Representative"), provided that the Customer has granted written authorisation and such authorisation is submitted to the Company from the Customer's registered email address or through another method acceptable to the Company. Where a complaint is submitted by an Authorised Representative, the Company may request evidence of the representative's authority to act on the Customer's behalf. If the Company is unable to verify such authority, it may contact the Customer directly to confirm the complaint and facilitate its investigation.

2.2.3. Complaints submitted to the Company should contain complete, accurate, and truthful information, together with any supporting documentation that may assist in the assessment of the matter. The information requested as part of the complaint submission process is indicative and may not be exhaustive. The Company reserves the right to request additional information, clarifications, or supporting evidence where necessary to facilitate the prompt, thorough, and efficient investigation and resolution of the complaint.

2.2.4. Upon receipt of a complaint, the Company shall acknowledge it within two (2) business days. The acknowledgement will include the expected timeframe for a response, the contact details of the person responsible for handling the complaint, and a unique reference number. The Company will then conduct an impartial review of the complaint and communicate the outcome of its investigation to the Customer, together with any proposed remedial actions where applicable, within twenty-one (21) business days from the date of receipt of the complaint.

2.2.5. Where the Company is unable to provide a final response within twenty-one (21) business days, it shall notify the Customer in writing of the reasons for the delay and the expected timeframe for completion of the investigation. In any event, the investigation shall be completed within a maximum period of ninety (90) business days from the date of receipt of the complaint.

3. Additional Information on Queries and Complaints

3.1. The Company may, at any stage during the assessment and handling of queries or complaints, request that the Customer provide additional information, clarifications, and/or supporting documentation. The Customer is expected to cooperate fully to enable the Company to complete its investigation.

3.2. Where a Customer fails to respond adequately and/or within the specified or reasonable timeframe, the Company may, as appropriate, extend the investigation period, place the matter on hold, or close the complaint.

3.3. Please note that the Company may consider a complaint closed and discontinue the investigation where the Customer fails to respond to the Company's requests for information within three (3) months from the date of submission of the complaint.

3.4. The Company encourages Customers to submit any query and/or complaint within a reasonable period following the occurrence of the relevant issue. Where possible, the Complainant should also provide details of the event, including the date of occurrence and the subject matter of the complaint, at the earliest opportunity. This is necessary to enable the Company to conduct an effective and timely investigation.

3.5. The Company may treat a query or complaint as closed in any of the following circumstances, including but not limited to:

a) where it is determined that no further action is required by the Customer or the Company following the issuance of the Company's final decision;

b) where the matter has been mutually resolved between the Company and the Customer;

c) where the Customer fails to respond to the Company's requests for information within three (3) months from the date of submission of the complaint;

d) where the Company has provided a substantive response and the Customer fails, within a reasonable timeframe, to indicate that the response is unsatisfactory and/or to substantiate the claim with relevant supporting information.

The Company shall notify the Customer upon closure of a query or complaint.

4. Responsibilities of the Complaints unit in Receiving Complaints

4.1. In accordance with Regulation 3 of the Financial Consumer Protection (Complaint Handling) Regulations, 2024 issued under the Financial Consumer Protection Act, 2022, the Company has established a dedicated Complaints Handling Unit responsible for the receipt, recording, assessment, investigation, and resolution of complaints submitted by financial consumers.

4.2. The Complaints Handling Unit shall ensure that complaint handling services provided by the Company are accessible, fair, accountable, timely, and efficient. The Unit shall be responsible for:

a) receiving complaints submitted by customers through any available communication channels, including in person, by telephone, email, online forms via the Company's website, or any other official communication method made available by the Company;

b) recording and maintaining accurate registers of all complaints received;

c) conducting or coordinating investigations into complaints received;

d) ensuring that all complaints are handled impartially and in accordance with this Policy;

e) maintaining communication with complainants throughout the complaint handling process;

and

f) ensuring that responses to complaints are issued within the timeframes prescribed under applicable laws and regulations.

4.3. The Complaints Handling Unit shall operate under the oversight of the Compliance Officer, who shall ensure that the Company maintains adequate procedures, resources and internal controls for the effective handling and resolution of complaints.

4.4. The Company shall ensure that employees involved in complaint handling receive appropriate training and are provided with sufficient resources to perform their duties effectively.

4.5. Complaints may be submitted by Complainants in relation to services provided by the Company under the applicable Client Service Agreement.

5. Registration of Complaints

5.1. The Company shall maintain a register of all complaints until their final resolution. The register shall include at least the following information:

i. the identity of the Customer who submitted the complaint;

ii. the identity of the employee who received the complaint;

iii. the department that initially received the complaint;

iv. the date of receipt of the complaint;

v. a full description of the complaint;

vi. the date of the Company's response and a summary of the content of the response.

5.2. The Company shall collect only such personal data as is necessary for the purpose of handling and resolving complaints, and shall avoid the collection of unnecessary information relating to the Complainant. All personal data obtained in connection with the handling of a complaint shall be retained for a period of not less than seven (7) years in accordance with applicable legal and regulatory requirements.

5.3. The Company shall manage complaints within a transparent system that enables each stage of the process to be tracked, monitored, and audited.

6. Classification of Complaints

6.1. All complaints shall be classified and analysed in order to identify systemic issues, recurring problems, and isolated incidents, as well as to detect trends.

Level 1 – Minor complaints: complaints that can be resolved at first contact with the Customer without escalation to senior management or the Compliance Officer.

Level 2 – Significant complaints: complaints that must be escalated to the Compliance Officer, who may provide guidance or input in the resolution process.

Level 3 – Serious complaints: complaints requiring escalation to the Managing Director due to their complexity, sensitivity, or potential regulatory, financial, or reputational impact.

7. Managing Complaints

7.1. The Company shall ensure that all complaints are handled fairly, consistently, and without discrimination, in accordance with this Policy.

The Complaints are handled by:

A) Complaints Team

Where possible, complaints shall be resolved at the earliest opportunity. Employees shall forward all written complaints to the Complaints Team, which shall be responsible for their initial handling and resolution.

Where a complaint is submitted by an Authorised Representative, the Customer must provide written authorisation, which shall be submitted from the Customer's registered email address or via another acceptable method of verification.

The Company aims to respond to complaints within twenty-one (21) business days, depending on the nature and complexity of the matter.

B) Compliance Officer

Where Customer Service determines that a complaint falls under Level 2 classification, the matter shall be escalated to the Compliance Officer for review, guidance, and oversight as necessary.

C) Directors of the Company

The Directors of the Company constitute the highest level of authority for the resolution of Level 3 complaints. Such complaints shall be handled by the Directors, who shall take into account the findings and recommendations of the Compliance Officer.

The Complaints Team shall provide all reasonable assistance during the investigation and resolution process to both the Compliance Officer and the Directors, in order to ensure timely and fair resolution of complaints in the best interest of the Complainant.

8. Response to Complaints

8.1. The Company shall follow the procedures outlined in this Policy to ensure that complaints are resolved within a maximum period of twenty-one (21) business days. The final response, including the reasoning for the decision, shall be communicated to the Complainant in writing via the email address provided. Certain complaints may be resolved earlier depending on their complexity and the nature of the issues raised. Where additional time is required due to the complexity of the matter, the Company shall inform the Complainant of the reasons for the delay. The Complainant may also be requested to provide additional information necessary for the investigation of the complaint.

8.2. Where a complaint is submitted by a third party or in circumstances where proper authorisation cannot be verified, the Company may request confirmation of the complaint from the authorised person or directly from the Customer.

8.3. The Company shall provide clear, comprehensive, and adequately reasoned decisions in relation to all complaints. Such decisions shall be communicated in writing to the Complainant. Where a decision is based on applicable legislation or regulatory provisions, the relevant legal and regulatory references shall be included where appropriate.

9. Customer Confidentiality and Record Keeping

9.1. The Company shall ensure that all complaints, together with any related records and correspondence, are treated with the highest level of confidentiality. Appropriate systems and controls shall be implemented to safeguard the security and integrity of such information. Access to complaint-related information shall be strictly limited to employees who require it for the purpose of investigating, handling, or resolving the complaint. No information shall be disclosed to third parties without the Customer's consent, unless required by law or requested by the FSA or any other competent authority.

9.2. Upon completion of the complaints handling process, the Company shall retain all complaint-related documentation, whether written or electronic, for a minimum period of seven (7) years. Such records shall be kept confidential. The Company may compile statistical reports on complaints for the purpose of improving its complaints handling framework. These reports shall be made available only to authorised persons, including regulators and auditors, upon request.

10. Consumer Awareness of Complaints Procedure

10.1. The Company shall ensure that Customers are informed of their right to submit complaints and of the procedures available for doing so.

10.2. In accordance with Regulation 12 of the Financial Consumer Protection (Complaint Handling) Regulations, 2024 issued under the Financial Consumer Protection Act, 2022, the Company shall provide Customers with details of its complaints handling procedures at the commencement of the business relationship.

10.3. The Company shall also make its complaints handling procedures publicly available through appropriate channels, including its official website and other relevant communication materials, where applicable.

10.4. Customers shall be informed of the methods available for submitting complaints, the procedures followed by the Company in handling such complaints, and their right to escalate the matter to the relevant competent authority where a complaint remains unresolved, as set out in Section 11 below.

11. Monitoring of Complaints

11.1. When a dispute between the Company and the Complainant cannot be resolved through the Company's internal complaints handling process, the Customer may pursue alternative avenues for redress. If, following the Company's investigation, a complaint is rejected and/or remains unresolved, the Complainant may refer the matter to the FSA for further review and any necessary regulation action. Further information is available on the FSA website https://fsaseychelles.sc/complaint-handling and also below:

12. Conflict of Interest

Financial Services Authority (FSA): It is mandatory for complainants to fill in the Complaints Handling Form before any complaint is investigated by the Financial Services Authority. All the information indicated on the form must be provided. The Complaint Handling Form, which is available on the FSA website, can be submitted by any of the following ways:	
1. Email address:	enquiries@fsaseychelles.sc
2. Formal letter addressed to:	The Chief Executive Officer Policy (Information & Communication Unit) Financial Services Authority Bois De Rose Avenue P.O Box 991, Victoria Mahé, Seychelles
3. Hand-delivered directly to the Authority:	Bois De Rose Avenue, P.O. Box 991, Victoria, Mahe, Seychelles
Link to complaint handling form	https://fsaseychelles.sc/other-fsa-documents/complaint-form/download

12.1. The Company shall take all reasonable measures to ensure that complaints are handled in an impartial and objective manner, free from any actual or potential conflicts of interest. Any Company officer who is directly involved in the subject matter of a complaint shall not participate in its review, investigation, or resolution. Where a conflict of interest is identified or reasonably suspected, the complaint shall be reassigned to an independent and suitably qualified officer, such as the Compliance Officer, to ensure fairness, objectivity, and transparency.

12.2. The Company maintains appropriate procedures to identify, assess, monitor, and mitigate conflicts of interest that may arise in the course of handling complaints. Such procedures form an integral part of the Company's internal control and corporate governance framework.

13. Non-Discrimination in Handling Complaints

13.1. The Company shall ensure that Customers are able to submit complaints freely and without fear of retaliation, adverse treatment, or disadvantage.

13.2. In accordance with Regulation 13 of the Financial Consumer Protection (Complaint Handling) Regulations, 2024 issued under the Financial Consumer Protection Act, 2022, the Company shall not directly or indirectly discriminate against, penalise, or treat unfavourably any Customer who exercises their right to submit a complaint under this Policy.

13.3. The submission of a complaint shall not affect the continuation of the Customer's business relationship with the Company or the provision of services, except where otherwise required by applicable laws or regulatory obligations.

13.4. All complaints shall be handled in a fair, impartial, and good faith manner, without bias, prejudice, or discriminatory treatment toward the Complainant.

HANABI LIMITED is authorised and regulated by the Financial Services Authority (FSA) of Seychelles with license number: SD116. HANABI LIMITED's registration number is 8428915-1.

Registered Address: Room B11, First Floor, Providence Complex, Providence, Mahe, Seychelles

Website: www.hanabimarkets.co
Email: info@hanabimarkets.co