



Complaint Management Policy

Customer Service

Purpose

The purpose of this section is to provide guidance for brokerage operations relating to customer complaints.

Customer Complaint

Customers may lodge complaints against Capital Express Securities Limited with the Regulators directly or with the Company. The complaint mechanism policies and procedures shall describe the policies set by Capital Express to record, monitor and resolve customer complaints.

Capital Express shall maintain a system for registering a customer complaint.

Recorded telephone conversation between the Broker and customer is considered evidence in case of any disagreements.

Procedures

The Customer Service Unit "CSU", Brokers Representatives, Head of Departments or the ED / CEO may receive customer complaints through email, telephone, in writing or in person. However, there may be instances wherein the customer raises a complaint directly with the Market.

All complaints received shall be documented and forwarded to the Head of Customer Service or any other designated personnel subject to review by the Compliance Officer who should forward the same to the ED / CEO or designated authority for suitable corrective action.

The Head of Customer Service should document the follow-up and resolution status of the complaint and attempt to resolve the matter as quickly as possible. The Compliance Officer shall be kept aware of the status of the complaints. Capital Express should ensure that an adequate follow-up mechanism is in



place to ensure that complaints are resolved promptly and recurring complaints are analyzed and resolved.

The Head of Customer Service shall maintain a Complaint Register capturing the name of the complainant, nature of the complaint, date of the complaint, the expected date of resolution, personnel responsible for resolution and the actual date of resolution and status of the complaint (whether the complaint is still active or closed).

The Head of Customer Service shall ensure that the customer complaints and their resolution and related correspondences are filed in a separate Customer Complaints File, and a copy retained in the respective customer file.

Where customer complaints have been received by the Regulator and forwarded to the Broker Company for resolution, the Compliance Officer shall acknowledge receipt of the complaint in writing. On resolution of the complaint, a copy of the response shall be forwarded to the Regulator by the Compliance Officer.

On a periodic basis, the Compliance Officer or designated personnel should undertake a root cause analysis of the complaints to determine recurring issues that may be rectified.