

COMPLAINT HANDLING POLICY

Last updated: Oct 10, 2025

1. Introduction

AddUp Markets Ltd (hereinafter the “Company”, “AddUp” and / or “we”) is regulated by the Financial Services Commission, Mauritius (“FSC”) under license number GB25204451 as an Investment Dealer (Full Service Dealer, Excluding Underwriting) for the provision of securities trading services for retail and institutional clients.

AddUp is committed to ensuring that the Clients’ complaints are handled fairly, promptly and transparently, in line with applicable legal and regulatory requirements.

This Complaint Handling Policy describes the procedure through which the Clients of the Company may submit a formal complaint after failing to resolve the issue informally through customer support, related to the services provided by the Company.

The meanings of words and expressions that were not defined in this Complaint Handling Policy shall follow the definitions described in the Client Service Agreement.

The official language of this Complaint Handling Policy shall be English. The Company may provide this Complaint Handling Policy in other languages for information purposes only and in the event of any inconsistency or discrepancy between the English version of this Policy and any other language version, the English version shall prevail.

2. Scope

2.1. The Company classifies a complaint as any objection and/or dissatisfaction that the Client may have with regards to the provision of the Services provided by the Company which the Client has first attempted to resolve informally with the Company’s customer support service but where a resolution could not be successfully achieved.

2.2. This Complaint Handling Policy applies to all Clients of the Company who wish to make a formal Complaint. Concerns or feedback that do not meet the criteria in Clause 2.1 will be handled through standard customer support channels.

2.3. The Company has appointed a **Complaints Handling Team**, who holds the ultimate responsibility for the investigation and resolution of Client Complaints and for applying necessary corrective measures to avoid recurring issues.

3. Complaint Handling Procedure

3.1. Ensuring adequate resources for effective Complaint handling is a key commitment of the Company, and we prioritise processes free from conflicts of interest in dealing with Complaints. The allocation of resources for addressing Complaints considers the nature and scale of the Company's services, the volume of Complaints, and the complexity of issues typically raised. The Company dedicates human and technical resources to manage and monitor Complaints, ensuring each is recorded, evaluated, and addressed within a reasonable timeframe. Communication with Complainants is conducted in clear and accessible language to foster understanding throughout the process.

The Complaints Handling Team shall be primarily responsible for handling Client complaints. The Coordinator of this Complaints Handling Team will report to the Board Members and provide regular updates to the Compliance Officer. All Client Complaints against the Company must be addressed to the team via email at complaints@addup.net. The team will be responsible for the day-to-day management and resolution of complaints.

3.2. Clients are required to submit their Complaint in writing along with the following information to facilitate a thorough review:

- **Complainant Details:** Full name (and for legal entities, the legal name and registration number), address of residence or registered office, and contact information (telephone number and email address) for the Complainant. If the Complainant has a Client reference number or Account number with the Company, this should also be included for identification purposes.
- **Representative's Details** (*if applicable*): If the Complaint is submitted by a representative of the Client, provide the representative's name and contact details, and a description of the representative's authority (with supporting documentation such as a power of attorney).
- **Description of the issue:** A clear description of the matter being complained about, including relevant dates, transactions, product or service involved, and the names or departments of any Company staff involved (if known). The Complainant should explain what they believe went wrong or how they were dissatisfied with the service.
- **Relevant reference numbers:** If the Complaint involves a specific transaction or order, include any relevant transaction ID, order number, or crypto-asset wallet address involved. Also include the reference of the crypto-asset service or

agreement to which the Complaint relates (for example, the contract or service name).

- **Desired resolution:** (Optional) The Complainant may state what outcome or action they seek from the Company (e.g., a correction to an account balance, an apology, a change in procedures, etc.). While the Company cannot guarantee that the requested resolution can be met, understanding the Client's expectation helps address the issue.
- **Supporting evidence:** Any documents or evidence that support the Complaint, such as screenshots, copies of communication, error messages, bank statements (if relevant to a payment issue), etc. This will help the Company investigate the issue more quickly.

3.3. All Client Complaints must be submitted in writing via email or post as per details below and should be as descriptive as possible in respect of the events that led to the filing of the Complaint.

3.4. The Company reserves the right not to formally review or to require re-submission of verbal Complaints or claims missing significant details required by Clause 3.2 (e.g., date of the event, affected positions, and requested compensation amount).

3.5. The Client may submit a Complaint by communicating it via any of the following options:

- Email: complaints@addup.net, or
- Postal Address: Office 306, 3rd floor, Ebene Junction, Rue de la Democratie, Ebene 72201, Republic of Mauritius.

3.6. The Company will acknowledge receipt of the Complaint via email within three (3) business days of receiving the Complaint. The acknowledgement will include the following:

- a unique reference number or ID assigned to the Complaint (for tracking purposes)
- a reference to the applicable timeline for handling the Complaint – i.e., an indication of how long it may take to investigate and send a final response, including relevant regulatory deadlines.
- The identity and contact details of the person or department handling the Complaint. This will typically include the name or title of the responsible within the Client Support and a direct phone number or email that the Complainant can use for any queries related to the Complaint.
- Confirmation that the Complaint is being investigated and that the Complainant will receive a final response once the investigation is completed.

If not already provided to the client, a copy of (or link to) this Complaint Handling Policy or a summary of it, so that the Complainant is fully aware of the process and their rights.

3.7. The Company may contact you to request further details or clarification, if necessary. Once all relevant information has been collected, the Company will provide a written response within twenty (30) calendar days from the date of initial acknowledgement. In particularly complex cases that require additional clarification or evidence, this period may be extended — however, it must not exceed 60 calendar days. In such a case, the Company will inform the Client of the reason for the delay and provide a new target date for the final response.

3.8. If you are still not satisfied with the Company's resolution after receiving our final response, you may choose to refer your complaint, with a copy of the Company's final response, to the Office of the Ombudsperson for Financial Services (OFS) for further examination:

The Office of the Ombudsperson for Financial Services: Website:

<https://www.fscmauritius.org/en/consumer-protection/complaints-handling>

Email: ombudspersonfs@ofsm Mauritius.org

Telephone: (+230) 460 0473/4

Postal Address: 8th Floor, SICOM Tower, Wall Street, Ebene Cybercity 72201.

4. Clients Records

4.1. You should provide all relevant documentation, as well as any additional information requested by the Company in order to ensure all records are collected and the complaint is properly resolved. All records will be retained in adherence to local requirements for a period of seven (7) years.