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1. INTRODUCTION

AXYS Stockbroking Ltd (“the Company”) is committed to provide the highest standard of customer service and also to maintain its reputation. Our customers are the heart of our business and we always strive to exceed their expectations by constantly delivering on our promises. Responsiveness, efficiency, integrity, fairness and quality are among the highest goals that we set for ourselves in all our dealings.

AXYS Stockbroking Ltd recognizes that customer complaints are important source of feedback and that not all grievances in fact, surface as Complaints.

In this respect, AXYS Stockbroking Ltd remains alert and sensitive to customer complaints, which are treated with the utmost sincerity and fairness, with a view to cure poor experiences suffered by clients through a resulting continuous process improvement.

Objectives of the Complaints Handling Policy:

1. provide a framework for employees when handling complaints from customers,
2. ensure consistency within the Company in handling and resolving complaints from customers,
3. help the Company in identifying shortcomings in processes and service quality,
4. understand the root cause of complaints and, based thereon, review the delivery standards, update the training program and implement deterrent and disciplinary measures.

2. SCOPE

This Policy concerns all business units and functions of the Company, with particular emphasis on those having direct interaction with customers.

It is important when dealing with complaints from clients that we maintain a positive attitude towards resolving the reported issues to the satisfaction of the customer. Thus, this Policy contains the steps to handle complaints.

3. CUSTOMER COMPLAINT HANDLING PROCEDURES

A complaint is an expression of dissatisfaction by one or more members of the public about the Company’s action or lack of action relating our service that does not meet the requirements of the client. It only relates to acts and omissions of the Company made within a period of one year (12 months) as from the date thereof, which causes a customer to be aggrieved.

AXYS Stockbroking Ltd values customer feedback and complaints and puts the complainant at the heart of the process in order to continuously improve on its standards and service. Complaints can come in different forms:

Means of complaint	Addressed to:
Telephone	405 4000
Face to face / in person	Client facing officers
In writing (letter / fax)	Client facing officers
Email	Client facing officers
Website	<u>Website link to be provided (under process)</u>

We acknowledge that mistakes can occur at any stage of a process due to a number of reasons/factors out of which some may be within and others beyond our control. It is not in our policy to create a ‘blame culture’ but instead to take reasonable action to resolve any issues at the earliest in order to satisfy our customers and create a relationship of trust.

3.1. Compensation

In cases where compensation is sought, it will be at the discretion of the Management to decide on what will be attributed and same will be formally communicated to the client.

3.2. Anonymous complaints

Anonymous complaints will be duly investigated through internal enquiry and may be referred to the Police depending on the complexity of the issue.

4. RESOLUTION OF COMPLAINTS

All complaints should be sent to the Compliance Officer. The Compliance Officer shall liaise with the Managing Director for a decision to resolve the complaint.

In the event the Compliance Officer is involved in the subject matter of the complaint, the complaint should be referred to the Managing Director directly. In the event both the Compliance Officer and the Managing Director are involved in the subject matter of the complaint, the matter should be referred to a Director who is not involved in the complaint. Any decision taken along with the complaint shall then be communicated to the Compliance Officer in order to update the complaints log.

5. COMPLAINTS LOG

Upon receiving a complaint, client facing officers / other concerned employee should immediately channel the complaint to the Compliance Officer and the Managing Director.

The Compliance Officer shall be responsible to maintain and review the Company's complaints log¹ to identify potential weaknesses and other compliance issues.

6. REPORTING

6.1. Internal Reporting

Compliance Officer will regularly review the Company's complaints log to improve complaints handling procedures, operating processes and services as appropriate. A report shall be made available to Management and the Board.

Such report shall include:

- Statistics on the volume and type of complaints received;
- How well internal complaint management system meets prescribed performance standards;
- Level of customer satisfaction
- Whether recurrent problems are being identified and corrected.

7. CUSTOMER COMPLAINTS PROCEDURES

If customers have a complaint about AXYS Stockbroking Ltd we want to hear about it and we will do our best to resolve the matter.

Our Complaints Handling Policy has the following goals:

1. To deal with complaints fairly, efficiently and effectively;
2. To ensure that all complaints are handled in a consistent manner throughout;
3. To increase customer satisfaction;
4. To use complaints constructively in the planning and improvement of all our services.

8. HOW TO COMPLAIN

AXYS Stockbroking Ltd would like to sort out any complaint as soon as possible. Customers may complain in different ways:

1. By telephone
2. Face-to-face or in person
3. In writing
4. By e-mail
5. Through the company's website

9. COMPLAINTS BY TELEPHONE

Please contact us on +230 405 4000 during working hours. The employee receiving the complaint should make a note of the substance of the complaint as soon as possible and channel same to the Compliance Officer and Managing Director for resolution.

10. FACE-TO-FACE COMPLAINTS OR COMPLAINTS IN PERSON

We invite customers to drop in at our premises and meet our Client facing officers who will care to listen to your complaint and advise you accordingly.

¹ Template complaints log given in Annex 1.

11. COMPLAINTS IN WRITING

For any written complaint send it to:

The Compliance Officer (Complaints)
 AXYS Stockbroking Ltd
 6th Floor, Dias Pier Building,
 Le Caudan Waterfront,
 Caudan,
 Port Louis
 Mauritius

12. COMPLAINTS BY EMAIL

We invite you to email your complaints to our Client facing officers.

13. COMPLAINTS THROUGH THE WEBSITE

You may also choose to post your complaints in our complaints section on our website.

14. TIME FRAME FOR SETTLING ISSUES

Where a complaint can be resolved on the spot, this will be favoured. In case, a complaint cannot be resolved on the spot, the customer should be requested to submit the complaint in writing.

Written acknowledgement to customer	Upon receipt of a complaint, the Company shall promptly send a written acknowledgement giving the name, job title and contact details of the person handling the complaint.
Written reply	The Company will send a written reply to the complainant as soon as a decision has been taken by the Management.

The Company should try to resolve the complaint within a period of one month from its receipt.

15. COMPLAINT TO FINANCIAL SERVICES COMMISSION & STOCK EXCHANGE OF MAURITIUS

Complainants should be informed that in case they are aggrieved by an act or omission, they may make a complaint in writing to the Financial Services Commission.

Complaints may also be made to the Stock Exchange of Mauritius (SEM).

If the complaint concerns a commercial dispute or unsatisfactory service, the complainant should first lodge the complaint promptly with us. If the complainant does not receive a satisfactory response after follow-ups with us, he/she may then consider lodging the complaint with SEM directly. Where the matter concerns improper conduct by the Company, the complainant may consider lodging the complaint with SEM².

² As communicated by the Stock Exchange of Mauritius through its website:

<https://www.stockexchangeofmauritius.com/education-investor-services/investor-services/investor-protection-complaint>