



XLENCE

COMPLAINT HANDLING POLICY



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Complaint Handling Policy

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Xlence is a trade name of Tradeco Limited (hereinafter the 'Company'). The Company aims to provide superior investment services to all of its Clients.

Definition

The Company classifies a complaint as any objection and/or dissatisfaction that the Client may have with regards to the provision of any investment service provided by the Company.

Managing Complaints

The Company manages all complaints and complainants without discrimination and in compliance with the requirements set out in this Policy. The responsibility of managing and handling complaints lie within the Compliance Department.

The Customer Support team shall investigate any issues they receive from the Clients and where the Customer Support team is unable to resolve the issue efficiently, then the Clients may progress their concerns by filing a complaint with the Company. The Compliance Department shall be responsible for handling Client complaints.

The Representative Officer shall be responsible for handling Client complaints in cases where the complaints involve the Compliance Department.

Procedure

The steps involved for filing a complaint with the Company are outlined below:

1. Clients may submit their complaint by sending an email from their registered email address to the Compliance Department at: compliance@Xlence.com

Clients should include in their email a detailed description of their issue and attach any supporting documentation regarding their complaint.

2. A written acknowledgment will be sent to the Client within 2 business days of receipt of a complaint by the Compliance Department;
3. The Compliance Department, upon receipt of the complaint and as part of its written acknowledgment, will advise the Client on the timeframe by when the Client will receive a response, will provide details of a designated person to contact regarding the complaint and will provide the complainant with a reference number for the complaint;
4. Within 21 days from the date that the Compliance Department receives the Client's complaint, a final response or a holding response will be sent to the Complainant explaining the findings of the investigation. In the case where a holding response is sent



to the Complainant, then an explanation shall be given stating the reasons why the Company has not been able to resolve the complaint as well as giving an estimated time to resolve the issue;

5. If after 21 days of receiving the complaint, we are still not in a position to resolve the issue then the Compliance Department will notify the Client in writing stating the reasons for the delay and indicating an estimated time to resolve the issue;
6. For grossly complicated complaints, the timeframe may be extended to 90 days from the date the client submitted his complaint and in such cases, the Company will inform the Client in writing and the timeframe by which a response will be provided to the Client;
7. When the complainant has received the final response, he will have 21 days to respond. If no response has been received from the complainant indicating that he is still dissatisfied with the explanation, then the Complaint will be considered resolved;
8. In the case where the complainant is still not satisfied with the Company's final response, then the complainant can refer his complaint with a copy of the Company's final response and relevant documentation related to the complaint to the competent authorities for further investigation.

Settlement of Disputes and Right to Appeal

In cases where the Company and the client cannot reach to a settlement in accordance with the official procedure mentioned above and the complaint is rejected, then the Client has the right to submit a formal complaint to the FSA through the [Complaints Handling section](#) of its website. The FSA within thirty (30) business days from the date of receiving a complaint, shall investigate and decide on such complaint.

If the FSA's decision is not in favour of the Client, the Client may have the option to appeal the decision through the [Appeals Board section](#) of the FSA website.

Contact details for the Financial Services Authority (FSA) Seychelles are set out below:

Address:	PO Box 991 Bois de Rose Avenue Victoria, Mahe, Republic of Seychelles
Phone:	(+248) 438 08 00
Fax:	(+248) 438 08 88
Website:	https://fsaseychelles.sc/contact-us
E-mail:	enquiries@fsaseychelles.sc



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Confidentiality

Any personal or sensitive information shared by the Clients during the complaint process should be kept confidential, including the client's identity, financial details and any specifics of the complaint. Any information related to the complaint is only shared with those who need to be involved in resolving it (i.e. relevant staff, regulators) and only to the extent necessary for the resolution of the complaint.

The Company complies with the applicable data protection laws and for more information please refer to the Company's Privacy Policy.

Conflicts of Interest

The Company has clear guidelines and procedures in place to identify, manage and mitigate any situations where the Company's interests or the interests of its employees could potentially conflict with the interests of its Clients. The Company also keeps records of all conflicts of interest that have been identified and managed in order for those records to be used if needed, to demonstrate the Company's compliance with the FSA regulations and to help FSA in case investigation of any complaints received is required.

For more information, please refer to the Company's Conflicts of Interest Policy.

Client Records

The Client should provide all relevant documentation as well as any additional information requested by the Compliance Department to ensure all records are collected and the complaint is properly resolved on time.

All records will be kept for a period of seven (7) years as per local requirements and will be handled in accordance with the Financial Consumer Protection (Complaint Handling) Regulations, 2024.

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