



Complaints Handling Policy

V.6 March 2022

COMPLAINTS HANDLING POLICY OF

Aerarium Limited, a company incorporated in Seychelles, on 08/05/2019, with registration no. 8425627-1 and registered address at CT House, Office 9A, Providence, Mahe, Seychelles is licensed by Seychelles Financial Services Authority (FSA) with license no: SD036 (hereinafter referred to as the “Company”, “we”)

This Complaint Handling Policy (hereinafter referred to as the “Policy”) sets out the processes employed when dealing with complaints received by clients.

Purpose of the Policy

The purpose of this Policy is to outline an effective and transparent procedure in place for immediate complaint handling for all clients' complaints so as to ensure the Company's compliance with applicable laws, rules and/or regulations. For the purposes of this Policy, Complaint shall mean an expression of dissatisfaction by a client regarding the provision of investment and/ or ancillary services provided to him/her by the Company.

The Company has appointed a Compliance Officer to efficiently handle any complaints from the clients. This is to allow the Company to resolve and apply mandatory measures to avoid any recurring issues.

Procedure

The Compliance Officer shall be responsible for handling Client complaints, except in the case where the complaint involves the Compliance Officer, whereby the complaint shall be handled by the Representative Officer. The final settlement of non-trivial complaints shall be approved by Senior Management.

In order to file a complaint, a client shall complete the Complaint Form developed by the Company (attached hereto as “Annex 1”), using any of the following options:

- Email : compliance@axianceint.com
- Postal Address: AERARIUM LIMITED
CT House, Office 9A, Providence,
Mahe, Seychelles

The following information should be provided to and recorded by the Compliance Officer, whenever possible, so as to make sure that the complaint is expedited in the most efficient and fair way for the best interest of the client:

- a. Full name of the client;
- b. Account Number;
- c. Date when the issue and/or problem first took place;
- d. Short summary of the complaint;
- e. Disputed amount and currency; and

- f. Provide any other document or otherwise relevant to the complaint.

Only duly completed and submitted Complaint Forms accompanied by adequate supporting evidence (as necessary) will be recorded as a Complaint by the Company and will be handled as such.

When the Compliance Officer receives the client's complaint then a written acknowledgement will be sent to the client within seven (7) business days.

The Company will aim to provide a final response to your complaint within thirty (30) business days, however in case we are still not in a position to resolve the issue then the Compliance Officer will notify you in writing stating the reasons for the delay and indicate an estimated time to resolve the issue.

In any case, a final response should be provided to the client within sixty (60) business days the latest from the date he submitted his complaint.

Furthermore, should a client fail to reply to any communication from the Company (including Company's final response) for a period of greater than one (1) month, the Company will consider the Complaint time-barred and closed.

In case where the client is still not satisfied with the Company's final response, then the client can refer his/her complaint with a copy of the Company's final response to the Financial Services Authority (FSA) in Seychelles for further examination.

The contact details for the Financial Services Authority (FSA) in Seychelles are set out below:

Address: PO Box 991
Bois de Rose Avenue
Roche Caiman Victoria, Mahe, Republic of Seychelles
Phone: (+248) 438 08 00

Email: complaints@fsaseychelles.sc

Fax: (+248) 438 08 88

Website: <http://fsaseychelles.sc/index.php/contact-us>

Submission of Complaints to an Alternative Dispute Resolution entity

Further to the above, it might also be possible a client to refer his/her complaint to an Alternative Dispute Resolution entity in Seychelles. Client should seek further details on this approach on his/her own.

Civil Action

It is understood that client's right to take legal action remains unaffected by the existence or use of any complaint procedures referred to above.

Hence, in the event a client is still not satisfied with the decision issued in regards to their complaint, they may take further legal steps by filing a civil action in the competent Court in Seychelles.

Client Records

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

All records will be kept safe as per local requirements and for a period of seven (7) years.

Disclaimer

All of the above do not apply in case when the client owes money to the Company.

In a case such as the above, the Company reserves its legal rights to initiate legal proceedings against the client, to recover any debts owed.

Also, nothing set forth herein shall prevent either party from applying to the competent Court for any of the interim or injunctive reliefs.

Each party acknowledges that a breach of the provisions set out herewith may cause the other party irreparable injury and damage and, therefore, any such breach may be enjoined through injunctive proceedings, in addition to, any other rights and remedies that may be available to either party as per applicable laws or in equity.

Annex 1: Client Complaint Form

Client Information:

Full Name/Legal Entity name (in case the Client is a legal person):	Account Number:
ID/Passport No/Registration No.:	Address:
E-mail:	Telephone:

Brief Summary of the Complaint:

Date of Incident:	Disputed Amount:
Description of the incident	
Name of Employee (if applicable):	Department (if applicable)::

Signature:	Date and Place:



E: support@axianceint.com | W: www.axiance.com/int

Aerarium Limited with registration no. 8425627-1 and registered address at CT House, Office 9A, Providence, Mahe, Seychelles.

Axiance is a trade name of Aerarium Limited, authorised and regulated by Seychelles Financial Service Authority (FSA) with license number SD036.