



PU Prime is a brand name of **PU Prime Limited**, an authorised Securities Dealer registered and regulated by the Financial Services Authority of Seychelles (“FSA”) under licence number SD050.

COMPLAINT POLICY

This policy details how PU Prime handles client complaints.

Version: June 2024

INTRODUCTION

PU Prime Limited (“the Company”, “us”, “our” or “We”) is a Securities Dealer authorised and regulated by the Financial Services Authority of Seychelles (“FSA”) under licence number SD050.

This policy is intended to guide clients and staff about the Company's complaints management process. To ensure that our clients are treated fairly, and that our complaints management procedure is effective, efficient, transparent and accessible, any client who lodges a complaint shall be provided with a written copy of this policy and details of the procedure which we follow when a complaint is received.

SCOPE

This policy covers all individuals working at all levels and grades, including managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term employees, casual staff and volunteers (collectively referred to as staff or employees). All staff are responsible for their own compliance with this policy and for ensuring that it is consistently applied. All staff should ensure that they take the time to read and understand their roles and responsibilities in respect of it. Breach of this policy will be dealt with under our Disciplinary Procedure and may be treated as gross misconduct which could result in dismissal.

REVIEW OF THIS POLICY

The policy shall be reviewed annually to ensure that it meets the legal requirements as per applicable regulations and reflects best market practice.

DEFINITIONS

‘Client’ means any person (natural or legal person) of whom the Company provides dealing and/or ancillary services.

‘Complaint’ means a statement of dissatisfaction by a client (natural or legal person) regarding the provision of dealing and/or ancillary services provided by the Company.

‘Complainant’ means a client (natural or legal person) who is presumed to be eligible to have a complaint considered by the Company and who has already filed a complaint.

The Company reserves the right to categorize and classify a notice received by a client as an enquiry rather than a complaint if such notice does not fall within the definition of **‘Complaint’** above which will be forwarded to the relevant department accordingly. The Client reserves the right to request for the re-classification of the enquiry as a complaint provided that reasonable grounds are presented to the Company.

OUR COMMITMENT

- The Complaints Policy will be made available to the client on request.
- We are committed to resolving any complaint timeously and fairly.
- All relevant staff will be provided sufficient training pertaining to complaints handling as per applicable regulations.
- Records of all complaints will be kept for a minimum period of 5 years. Your personal information submitted will also be held for at least 5 years. The information will be made

available to/ processed by our staff where required, as well as our compliance practice for audit purposes, the Financial Services Authority of Seychelles (FSA) and any other regulators who have jurisdiction.

PROCEDURE WHEN SUBMITTING A COMPLAINT

All complaints should be completed using the specified complaint form available on our website and shall be submitted via email to: compliance@puprime.com.

The following information must be provided in order for us to assist:

- Your name, surname and contact details;
- A complete description of your complaint including details of the person, area or institution;
- Details of when and where the transaction took place;
- All documentation relating to your complaint; and
- Method of preferred communication; and
- Any other information required in the complaint form

Procedure when we have received your complaint

When we receive your complaint, we will:

- Acknowledge receipt, in writing, within 48 hours and add your complaint to our internal complaints register.
- Your complaint will be allocated to an appropriate person for further investigation. This will not be the person against whom the complaint is lodged.
- We may ask for additional information if needed.
- We will investigate, attempt to resolve and respond within 21 days from the date of receiving your complaint, or after receiving any additional information we require.
- If we require more time to investigate the complaint, it will be communicated to you in writing.
- We will let you have our response in writing with full reasons. Please note that certain decisions may have to be approved by the governing authority of the organisation. In such a case, we will communicate that fact to you, as well as the date on which a decision will be taken.

In the event of us not revert to you within the time periods indicated above, kindly contact our Compliance officer for an explanation as to why we have not yet communicated with you. Please do not accept any communication from any person until it has been confirmed in writing.

COMPLAINTS REGISTER

Received	Date	From	Product	Client Number	Client Name & Surname	Complaint Description	Captured by	Responsible Person	Activity update	Outcome	Date Comm to Client	Learning

Customer Complaint Form

Please fill in your details & form below

Name of Client:	
Client Email Address:	
Trading Account Number:	
Client Telephone Number:	
Date of the Complaint:	

Nature of Complaint:

(Please state full details below and attach relevant documents)

Complaint received by:

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Initial response to client (24h):

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Informed client of initial action taken: YES / NO

Final response:

.....

Final response sent to client: YES / NO

File handed to C.O: YES / NO

Signature of C.O:.....