Complaints Handling and Dispute Resolution Policy

OVERVIEW

This Complaints Handling and Dispute Resolution Policy *(the "Policy")* establishes the framework through which the Company receives, reviews, investigates, and resolves complaints, concerns, disputes, and service-related issues raised by Clients.

The Company is committed to addressing complaints in a fair, transparent, timely, and impartial manner. This Policy is intended to promote effective communication, support client confidence, and provide a structured process for the resolution of disputes arising from the Company's products, services, platforms, or business activities.

APPLICATION

This Policy applies to all Clients, prospective Clients, and other individuals or entities maintaining a business relationship with the Company.

By submitting a complaint, inquiry, or dispute, the Client agrees to cooperate with the procedures set out in this Policy and to provide information reasonably required for the assessment and resolution of the matter.

This Policy shall be read together with the Company's Service Terms and Conditions and other applicable policies and procedures.

DEFINITIONS

For the purposes of this Policy, unless the context requires otherwise:

"*Client*" means any individual, legal entity, authorized representative, or account holder who maintains or seeks to establish a business relationship with the Company.

"*Complaint*" means any written expression of dissatisfaction, concern, dispute, or objection relating to the Company's services, products, policies, personnel, or business practices.

"*Registered Email Address*" means the email address associated with the Client's verified account and recognized by the Company for official communications.

"*Business Day*" means any day on which the Company is open for normal business operations, excluding weekends and public holidays applicable to the Company.

"*Compliance Officer*" means an employee, officer, or designated representative responsible for reviewing and addressing complaints, regulatory matters, or compliance-related concerns.

"*Goodwill Resolution*" means a discretionary measure offered by the Company to resolve a complaint without admission of liability or legal responsibility.

"*Internal Resolution Process*" means the complaint-handling procedures established by the Company under this Policy.

CHAPTER 1: SUBMISSION OF COMPLAINTS

1.1 Complaint Submission

Clients wishing to submit a formal complaint shall do so exclusively by sending an email to the Company's designated complaints email address: legal@boursley.com.

Complaints should include sufficient information to enable proper review, including the Client's name, account or reference number, contact information, details of the issue, and any relevant supporting documentation.

1.2 Supporting Evidence

Where a complaint involves transactions, payments, account activity, trading activity, or financial matters, the Company may request supporting records, statements, confirmations, screenshots, correspondence, or other evidence necessary to investigate the matter.

1.3 Incomplete or Anonymous Complaints

The Company may decline to investigate complaints that are anonymous, incomplete, frivolous, abusive, or unsupported by sufficient information.

Notwithstanding the foregoing, the Company reserves the right to investigate matters involving suspected misconduct, regulatory concerns, fraud, or other serious issues where appropriate.

CHAPTER 2: REVIEW AND INVESTIGATION PROCESS

2.1 Acknowledgement of Receipt

The Company shall endeavor to acknowledge receipt of a valid complaint within a reasonable period following submission.

2.2 Assessment and Investigation

Upon receipt of a complaint, the Company may review account records, communications, transaction data, platform logs, contractual documentation, and other relevant information necessary to assess the matter.

2.3 Resolution Timeframes

The Company shall seek to resolve complaints within a reasonable timeframe. More complex matters may require additional investigation and review.

2.4 Interim Updates

Where a complaint cannot be resolved promptly, the Company may provide updates regarding the status of the investigation and any anticipated resolution timeframe.

2.5 Compliance Review

Complaints involving legal, regulatory, financial crime, reputational, or compliance-related concerns may be referred to a Compliance Officer or other authorized personnel for further review.

CHAPTER 3: CLIENT RESPONSIBILITIES AND ESCALATION

3.1 Timely Notification

Clients are encouraged to report concerns, discrepancies, unauthorized activity, execution issues, account irregularities, or service-related concerns as soon as reasonably practicable after becoming aware of them.

3.2 Delay in Reporting

The Company reserves the right to consider the timing of a complaint when assessing its validity and may reject claims where excessive delay materially affects the ability to investigate the matter.

3.3 Cooperation Requirement

Clients shall cooperate fully with any investigation and provide information, clarification, or supporting materials reasonably requested by the Company.

3.4 Standards of Conduct

Clients are expected to communicate respectfully and professionally throughout the complaint-handling process.

The Company reserves the right to discontinue communications that are abusive, threatening, defamatory, discriminatory, or otherwise inappropriate.

3.5 Escalation of Complex Matters

The Company may escalate complaints involving significant financial impact, legal considerations, regulatory implications, or operational complexity to senior management or designated review personnel.

CHAPTER 4: RESOLUTION AND OUTCOME

4.1 Verification Requirements

The Company may require complaints to be submitted from the Client's Registered Email Address or through other approved verification methods before processing the complaint.

4.2 Determination of Complaints

Following completion of the review process, the Company shall notify the Client of its findings and, where appropriate, any corrective action or resolution measures.

4.3 Remedial Measures

Where a complaint is upheld, the Company may implement corrective actions, account adjustments, operational improvements, or other measures considered appropriate in the circumstances.

4.4 Goodwill Resolutions

The Company may, at its sole discretion, offer goodwill resolutions, ex gratia payments, service credits, or other gestures of goodwill without admitting liability.

4.5 Internal Finality

Unless otherwise required by law or regulation, decisions reached through the Company's Internal Resolution Process shall constitute the final stage of the Company's internal review procedures.

CHAPTER 5: GENERAL PROVISIONS

5.1 Client Obligations

Clients shall comply with this Policy and provide accurate, complete, and truthful information throughout the complaint-handling process.

5.2 Confidentiality

Information relating to complaints, investigations, and resolution processes shall be treated confidentially and may only be disclosed where required by law, regulation, or legitimate business purposes.

5.3 External Dispute Resolution

Where permitted by applicable law or regulatory requirements, Clients may refer unresolved complaints to a competent regulatory authority, dispute resolution body, ombudsman, mediator, or other authorized forum after completion of the Company's Internal Resolution Process.

5.4 Policy Amendments

The Company reserves the right to amend, update, replace, or withdraw this Policy at any time.

Any revised version may be published through the Company's website, platform, or official communication channels and shall become effective upon publication unless otherwise stated.

5.5 Record Retention

The Company may retain records relating to complaints, investigations, correspondence, evidence, and resolutions in accordance with applicable legal, regulatory, and operational requirements.

5.6 Regulatory Cooperation

The Company may cooperate with regulators, courts, law enforcement agencies, dispute resolution bodies, and other competent authorities where required by law or regulatory obligations.

5.7 Policy Review

This Policy shall be reviewed periodically and may be amended to reflect changes in applicable laws, regulatory requirements, operational practices, or industry standards.

The most recent version of this Policy shall supersede all previous versions and shall remain effective until amended or replaced by the Company.