

Procedures for resolving customer complaints

Definition of a Complaint

Under the Complaint Handling Rules, XS Capital Securities & Financial Services Ltd (hereinafter called the “Company”) must deal with any expression of dissatisfaction about any financial services activity provided or withheld by the Company. Complaints could be made orally, in writing, by email or by telephone. It is important for us to deal properly with any complaint made by a customer, whatever the subject of the complaint might be.

Procedure

- The Compliance Officer will deal with customers’ complaints except in cases where a conflict of interest exists; in such a case, the Director of Financial Services will deal with the complaint.
- Complaints will be forwarded to the Compliance Officer within 48 hours from the time of their reception accompanied with a completed “Complaint Form” (see below)
- A written acknowledgment will be sent within 48 hours to the client who made the complaint confirming the name and the job title of the person dealing with his/her complaint, together with details of the Company complaint handling procedures
- Within 4 weeks from the date a complaint is received, the Company will send the complainant a Final Response or a Holding response, which will explain why it is not yet in a position to resolve the complaint and give an indication of when further contact will be made (within 8 weeks from the date a complaint has been received)
- Within 8 weeks from the date a complaint is received, the Company will send the complainant either:
 - A Final Response
 - A response which explains why a final response can not be given and an indication of when it is anticipated to be able to provide the complainant with the final response
 - Upon sending the final response to the complainant, he/she will have 8 weeks to respond
 - If a response is not received within 8 weeks then the Company is not obliged to take the complaint further unless further correspondence is received from the client indicating that he/she is still dissatisfied
- The Company will inform the client that he/she may refer the complaint (with a copy of the final response) within a period of 6 months, to the competent authorities for further investigation if deemed to be appropriate.