

ACTIVE CORP LTD
Complaints Handling Policy

June 2026

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1. Introduction

ACTIVE CORP LTD is incorporated under the laws of Saint Lucia (registration number 2026-00377), with it registered office at Ground Floor, Rodney Court Building, Rodney Bay, Gros Islet, Saint Lucia.

ACTIVE CORP LTD is being hereinafter referred to as the ‘ActiveXBT’ and/ or ‘the Company’.

2. Purpose & Scope

The present Compliant Handling Policy (the “**Policy**”) regulates effective, clear and fast handling of complaints submitted to ACTIVE CORP LTD (hereinafter the “**Company**” and /or “**ActiveXBT**”) in relation to its services. The Company maintains records of its complaints and measures taken for their expedient resolution, in line with applicable Laws, Rules and/or Regulations. The Company manages all complaints equally and fairly, without any discrimination, in harmony with the procedure of this Policy. The Policy also promotes accessibility to the complaints handling process for all consumers, while ensuring compliance with anti-discrimination requirements.

3. Definitions

Company Means ACTIVE CORP LTD as incorporated under the laws of Saint Lucia (registration number 2026-00377), with its registered office at Ground Floor, Rodney Court Building, Rodney Bay, Gros Islet, Saint Lucia.

Complaint Means an official complaint submitted to the Company, as per the guidelines of this Policy and following the completion and submission of the relevant Complaint form included in Appendix 1 of the present Policy. A Complaint is defined as an expression of dissatisfaction by the financial consumer in respect of the products or services provided by the Company, or the conduct of the Company in the provisioning of products or services, and where a response or resolution is expected by the financial consumer, and the term “complainant” shall be construed; accordingly.

Complainant A verified Client of the Company who has lodged a written Complaint, using the Complaint Form, in accordance with the instructions included in this Policy and was assigned a unique reference number for the Complaint.

Enquiry Means a request for information, clarification or assistance made by a Client to the Company in relation to its products, services or operations.

4. Submitting a Complaint

A complaint can be raised to the Company via telephone or written electronic communication (e-mail) to the Customer Support Department of the Company at cs@activexbt.com. The Complainant should report an event, the date of the event, the subject of the complaint and provide all supplementary evidence to the Company as soon as possible. This is necessary to enable the Company to investigate the complaint as efficiently and timely as possible.

Any Complaint may also be lodged on behalf of a complainant, by a Representative of the Complainants (e.g., a lawyer) provided that the appropriate written authorisation, e.g., a Power of Attorney has been submitted to the Company. The Complainants must submit their complaints in relation to services rendered on the basis of the Client Agreement accepted during onboarding as it may be updated from time to time.

5. Investigation of the Complaint

The Complaints shall be assessed by the Company as soon as possible with consideration of the Company's available resources and completeness of data. In any case where the Complaint has grounds the Company shall proceed to investigate the Complaint. During the investigation, the Company will conduct all necessary checks, liaise internally and gather all related information in order to provide an impartial response to the Complaint.

The Company shall within 5 business days, from the receipt of a Complaint in accordance with the provisions of this Policy, acknowledge in writing the receipt of a Complaint. This acknowledgment shall include:

- A unique reference number for the Complaint;
- The name and contact details of the designated officer or department handling the complaint;
- A clear timeframe for when the Complainant will receive a response.

In cases where a submission is not made in line with the provisions of this Policy, the Company reserves the right not to acknowledge or process such submission. However, in cases where the merit of the Complaint suggests that additional actions may be required, the Company may choose, at its discretion and as a gesture of a good-will, to acknowledge and investigate such submission as the Complaint.

6. Response to Complaints and Resolution Timeframes

After acknowledgement of your Complaint and assignment of the unique reference number for the Complaint, the Company will provide a response within a period of thirty (30) business days unless we inform you otherwise. The outcome of the investigation, including the reasoning and resolution, will be communicated to you.

In case where the Complaint appears to be more complex or require the provision of further clarifications and/or supporting evidence by the Complainant, the resolution period may be extended to up to ninety (90) business days. In such cases the Company shall explicitly communicate the reasons for the delay to the Complainant.

The Company adds correct, clear and unanimous reasoning to every decision brought down to settle complaints, which are mailed to the Complainant in writing. If the decision refers to legislation, its relevant regulations must also be included in the above reasoning.

The following Company department is responsible for the handling of Complaints:

Compliance

If the Customer Support Department is unable to settle the enquiry efficiently or within a short period of time, they shall refer the Client (or escalate the complaint) to the **Compliance**. The **Compliance** is the function responsible for overseeing the management and resolution of Complaints. In cases when the Complainant does not accept the solution offered by the Customer Support Department, they are entitled to escalate the matter to **Compliance**

If feasible, the Company aims to resolve the matter within as soon as possible depending on the nature of the complaint and ensure that the maximum time to provide a response to complaints does not exceed thirty (30) business days from the date of lodging the complaint unless we inform you otherwise.

If possible, all Complaints must be investigated and settled without delay. Company employees forward all formal Complaints submitted in writing to the **Compliance**. The Customer Support officers shall inform each Complainant of the appropriate process to follow.

To ensure the Company can properly address each Complaint, Complainants are required to complete the Complaint Form included in **Appendix 1** and submit it to the **Compliance**. In the event when the Complaint Form is not used, the Client's complaint cannot be addressed by the **Compliance**.

7. Settlement of Disputes

St. Lucia does not operate an independent financial ombudsman service and generally does not have authority to adjudicate private disputes or award compensation to complainants.

Where a complaint cannot be resolved through the Company's internal complaint handling procedures or through engagement with the relevant regulatory authority, the complainant may pursue the matter through the courts of competent jurisdiction, arbitration, mediation, or any other dispute resolution mechanism provided for under the Client Agreement and applicable law.

The Company shall maintain records of all complaints referred to external authorities or dispute resolution bodies and shall cooperate fully with any lawful requests for information received from competent regulatory, judicial, or dispute resolution authorities.

8. Record Keeping of Complaints

The Company shall maintain a Registry of Complaints and ensure that it is regularly updated to include all submitted Complaints.

The Company records, except from the details of the Client, the reference number assigned, and evidence gathered during investigation, keeps any data needed for the resolution of the Complaint.

The Company manages Complaints within a transparent system; they could be traced and administered in each and every stage of the procedure. Since the Company accepts formal Complaints only via email, all the correspondence is duly recorded.

The Company shall preserve every written or electronic document related to complaints for a period of 5 years. The Company shall be entitled to prepare statistics and reports about Complaints, which will be aimed at improving the efficiency of administering complaints.

9. Policy Reviews and Amendments

This Policy shall be reviewed at least annually if there are no material changes in the respective regulatory framework nor the Company's products or services. In case where such changes should occur, the Policy shall be reviewed upon each respective change and amended accordingly, if deemed required, to ensure compliance.

Appendix 1 – Complaint Form

Client Information:

Full Name:	
Email Address:	
Account Number(s):	
Address:	
Telephone Number:	

Date of Incident:	
Claimed Sum:	

Brief Summary of the Complaint: Please describe the product or service you are complaining about (description, evidence, amount and suggested way to be solved):

Please enclose all supporting documentation and evidence that may help us to handle the Complaint. Possible documentation that will be required: client statement, correspondence with the Company, as well as any other supporting documentation to be requested by the Company which is relevant to the Client's complaint.

DATE Client Signature

For internal use only:

Complaint Received By:		Date:
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Acknowledgement sent to Client: Yes No

Informed Client of initial action:	Yes	No	
Final response provided to Client:	Yes	No	
Holding response provided to Client:	Yes	No	N/A

Signature of the Officer:

Date: