COMPLAINT MANAGEMENT POLICY FOR CLIENTS

August 2025

[PUBLIC DOCUMENT]
v.2.0

Exclusive Change Capital Ltd is incorporated under the laws of Cyprus with registration no. HE 337858, regulated by CySEC under license no. 330/17.

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1. INTRODUCTION

Exclusive Change Capital Ltd (hereinafter the "Company") has adopted this Complaints Policy in order to ensure a fair and quick process for handling complaints that may arise from business relationships.

The Company is authorised and regulated by the Cyprus Securities and Exchange Commission as a Cyprus Investment Firm (CIF License Number 330/17). Exclusive Change Capital Ltd is registered in Cyprus under the Companies Law, with registration number HE 337858 and has its registered office at *56 Theodorou Potamianou, 4th floor, Kato Polemidia, 4155, Limassol, Cyprus.*

Pursuant to the provisions of Markets in Financial Instruments Directive 2014/65/EU(hereinafter referred to as "MIFID II") and the Law 12(I)/2025, as amended from time to time, the Company is required to establish, implement and maintain an effective and transparent complaints handling policy and procedures for the prompt handling of Clients' or potential Clients' complaints.

In this respect, the Company has established a "Complaints Procedure Policy" which provides information to Clients should they wish to submit a complaint to the Company as well as a robust framework comprising of, amongst others, procedures, processes, controls, and monitoring processes.

2. GENERAL PRINCIPLES

Purpose of this document
This document is a Summary of the Company's Handling Policy and sets forth in summary the arrangements employed by the Company for the prompt submission and handling of existing Clients' or prospective Clients' complaints.

Regulatory Framework
The Policy has been prepared in accordance with the following laws, regulations, directives and guidelines:

- Law 12(I)/2025 regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets of 2025;
- Directive 2014/65/EU of the European Parliament and of the Council, of 15 May 2014 on Markets in Financial Instruments;
- Commission Delegated Regulation (EU) No. 2017/565 of 25 April 2016, supplementing Directive 2014/65/EU of the European Parliament and of the Council;

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- Guidelines on complaints' handling for the securities (ESMA) and banking (EBA) sectors (JC 2018 35); and,
- Other laws, directives and circulars issued by ESMA and CySEC from time to time, applicable to this Policy.

3. ROLES AND RESPONSIBILITIES

The Board of Directors

The Company's Board of Directors is responsible for the approval of this "Complaints Procedure Policy" and any subsequent amendments/revisions.

Responsibilities of the Compliance Department

The Compliance Department has the responsibility to:

- ensure that the provisions stipulate in the Policy are followed at all times.
- periodically evaluate the effectiveness of the Policy and adopt any alternative or additional measures where necessary and appropriate.
- maintain and periodically review the list of Client's complaints and ensure that feedback is provided to Clients in a timely manner, in line with the provisions of this Policy.
- analyse complaints and complaints-handling data to ensure that any risks or issues are timely identified and addressed.
- monitor the operational effectiveness of the complaints-handling process on an ongoing basis and consider complaints as a source of relevant information in the context of the Company's general monitoring responsibilities.
- report to the Company's BoD, on at least an annual basis, on the complaints-handling reporting as well as remedies undertaken or to be undertaken.
- provide advice in relation to the implementation of this Policy.
- make available the above information to the relevant Competent Authority, if requested.

Responsibilities of Internal Audit Department

The Internal Audit Department has the responsibility to perform an audit, at least on an annual basis, to assess the compliance level of the employees/departments, as well as the Company as a whole, in connection with the provisions stipulated in this Policy.

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4. COMPLAINTS HANDLING

Exclusive Change Capital Ltd aims to provide the best possible service to its existing Clients and/or prospective Clients. In this respect, the following principles have been adopted in order to ensure that complaints received from existing Clients and/or prospective Clients are handled promptly and in a reasonable manner.

5. SUBMITTING YOUR COMPLAINT

In order to submit a complaint to the Company, the client is kindly requested to complete and submit the **Complaint Form** of the Company (click the button below) to complaints@excaprime.com. Please note that the Company may not accept complaints submitted to it by any other means/method (i.e. Fax, telephone, etc.).

Download the Complaint Form

Once the client successfully completes and submits their complaint, the Compliance Department of the Company shall handle and investigate the complaint.

6. ACKNOWLEDGE OF CLIENTS' COMPLAINT

Once the Company acknowledges the receipt of the complaint, it will immediately make efforts to resolve the complaint within five (5) business days from the receipt of the complaint and provide the clients with the unique reference number of their complaint. The unique reference number should be used in all their future contact with the Company, the Financial Ombudsman and/or CySEC regarding the specific complaint.

7. COMPLAINTS HANDLING

The Company shall be responsible for reviewing it carefully, investigating the circumstances surrounding their complaint and will try to resolve it without undue delay.

The Company shall make every effort to investigate Clients' complaint and provide them with the outcome of the investigation within two (2) months from the date they have submitted their complaint to the Company. During the investigation process, the Client will be kept updated of the handling process of their complaint. One of the Company's officers may contact the Client directly

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(including communication by email or phone) to obtain, where needed, further clarifications and information relating to their complaint. The Company will require the full cooperation of Clients to expedite the investigation and possible resolution of their complaint.

In the event that the complaint requires further investigation, and the Company cannot resolve it within two (2) months, it will issue a holding response in writing or another durable medium. When a holding response is sent, it will indicate the causes of the delay and when the Company's investigation is likely to be completed. In any event, it shall provide the Client with the outcome of their investigation no later than one (1) month from the issuing of the holding response, depending on the complexity of the case and their cooperation.

Please note that the Company shall consider the complaint as closed and cease the relevant investigation in case they fail to respond to the officers within the period of three (3) months from the date of the submission of their complaint. When they reach an outcome, they will inform them of it together with an explanation of their position and any remedy measures the Company intends to take (if applicable).

8. FINAL DECISION

When the Company reaches an outcome, it will inform the Client of it together with an explanation of their position and any remedy measures they intend to take (if applicable).

Contact Details of the Financial Ombudsman of the Republic of Cyprus:

Website: http://www.financialombudsman.gov.cy
Email: complaints@financialombudsman.gov.cy
Address: 13 Lord Byron Avenue, 1096, Nicosia
Postal Address: P.O. Box 26722, 1647, Nicosia
Telephone: +357 22848900
Fax: +357 22660584, +357 22660118

If the Client is not satisfied with the Company's final decision, they may submit their complaint to the Financial Ombudsman of the Republic of Cyprus and seek mediation for possible compensation. It is important that they contact the Financial Ombudsman of the Republic of Cyprus within four (4) months of receiving a final response from the Company otherwise the Financial Ombudsman of the Republic of Cyprus may not be able to deal with their complaint. In the unlikely event that the Company was unable to provide Clients with a final response within the three (3) month time period specified above they may again contact the office of the Financial Ombudsman of the Republic of

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Cyprus no later than four (4) months after the date when the Company ought to have provided the Client with its final decision.

Contact Details of the Cyprus Securities and Exchange Commission:

Website: http://www.cysec.gov.cy
General email: info@cysec.gov.cy
Postal Address: P.O. BOX 24996, 1306, Nicosia
Telephone: +357 22506600
Fax: +357 22506700

The Client may maintain their complaint with the Cyprus Securities and Exchange Commission (CySEC), however, please note that the Cyprus Securities and Exchange Commission does not have restitution powers and therefore does not investigate individual complaints. It is understood that the right to take legal action remains unaffected by the existence or use of any complaint procedures referred to above.

9. RECORD KEEPING REQUIREMENT

The Company shall keep records of each complaint and the measures taken for the complaint's resolution for a period of five (5) years, or seven (7) years, if the CySEC requests so.

10. MONITORING OF COMPLAINTS

The Company must analyse on an on-going basis the complaints handling related data in order identify common issues arising from various types of complaints, to identify systematic deficiencies, as well as to understand whether such root causes affect other processes or financial means, to initiate appropriate actions to make the complaints redressal mechanisms more efficient and effective.

11. CREATION/PERIODIC REVIEW/UPDATE OF THE COMPLAINTS HANDLING POLICY

The Company acknowledges its responsibility to establish, implement and maintain an effective written "Complaints Handling Policy".

This Policy is created, owned, and maintained by the Compliance Department, which is responsible for maintaining version series, original requests, and supporting documentation with all approvals of this Policy.

The Company's Policy is assessed and periodically reviewed, at least on an annual basis, or more frequently, should the need arise.

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The Compliance Department will use all reasonable endeavors to ensure that the Policy remains up-to-date and appropriate to the structure and size of the Company as well as the nature, scale, and complexity of the Company's activities. Any amendments to this Policy shall be approved by the Company's Board of Directors.

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