BROKR Ltd.
168, St Christopher Street,
Valletta, VLT 1467, Malta

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CRN: C 97175

BROKR

Complaints Procedure

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1. How we handle complaints

We are committed to giving you a high standard of service. In case you are unhappy with the service you have received, we make every effort possible to give you every opportunity to put things right and hence sort out complaints satisfactorily. However, if this is not possible and your complaint is more complicated, we will refer you to our dedicated Compliance Officer whose aim is to deal with complaints from retail clients arising out of transactions involving persons regulated by the Malta Financial Services Authority (MFSA). Our Compliance Officer is to deal with complaints fairly, consistently and in a timely manner.

Below we will explain what our internal complaint-handling procedure entails.

2. How to Raise a Complaint

If you have a complaint, please follow these steps:

1. **Contact Customer Support:**
    - In the first instance, we encourage you to contact our dedicated Customer Support via the channels as provided on the trading platform. They are available to address your concerns and work towards a resolution.

2. **Submit a Formal Complaint:**
    - If your concern is not resolved to your satisfaction, you may submit a formal complaint in writing. Please include details such as your name, account information, a clear description of the issue, and any supporting documentation. A template for formal complaints can be found in the Annex of this document.

    - You can submit your formal complaint in writing to Dr. David Griscti (Compliance Officer) through one of the following channels:
        - Email: dgriscti@dglawfirm.com.mt
        - Postal Mail: 168, St. Christopher Street, Valletta VLT1467, Malta

3. **Acknowledgment of Complaint:**
    - Upon receiving your complaint, we will promptly acknowledge it, providing you with a reference number and the contact details of the person handling your case.

3. When we receive your complaint

We will write to you or to your personal representative promptly to let you know that we have received your complaint. We will also explain how we intend to deal with it. If you complain to us by phone, we will request you to formalize your complaint in writing to us and we will confirm our understanding of your concerns, so you will have a chance to tell us if we have got it wrong.

4. Resolving your complaint

We will look into your complaint and will either write to you or phone you to in case we need more information from you to resolve the issues involved. Of utmost importance is that we will consider your case impartially on its own merits after due discussion with you and all the parties concerned.

4.1 If there is a delay in resolving your complaint

Our regulator, the Malta Financial Services Authority (MFSA), expects us to resolve most complaints within a reasonable time. We are committed to achieving this and where possible, resolving complaints even sooner. If we do not have all the information we need to resolve it and need to collect this, or if there is a delay for any other reason, we will write to you to let you know what is happening. In the event your complaint takes longer than two months to resolve, we will write to you at that time to explain why.

4.2 Submit complaints within a reasonable timespan

Our Compliance Officer shall not investigate complaints if more than 12 months have passed since you became aware of the circumstances giving cause to the complaint or if more than 6 months have passed since you were notified in writing that your complaint was not upheld. If you are not happy about any service provided by us do not hesitate to let us know.

4.3 Complaints Handling Procedure

Should a client wish to lodge a formal complaint, they must fill in the Formal Complaint Template as provided in Annex 1 and submit it to via the provided channels as mentioned under section 2.2 of this document. BROKR shall subsequently acknowledge in writing, receipt of the complaint within seven (7) business days.

BROKR will investigate a complaint in a fair and prompt manner and shall on completion of the investigation, inform the complainant of the outcome of the investigation and if any remedial action is warranted. Where the investigation is not concluded within fifteen (15) days from the date of receipt of the complaint, BROKR shall inform the complainant about the causes of the delay and provide an indication as to when the investigation is likely to be completed. BROKR will then issue a final response that will state:

1) A brief description of the complaint and of the outcome of the investigation;
2) BROKR's final view on the issues raised in the complaint;
3) The details of any redress offered.

BROKR will consider a complaint to be closed when a final response has been sent to the complainant or if the complainant informs BROKR in writing that he considers the matter to be closed. The date of closure of the complaint shall be recorded in the BROKR's Complaints Register.

In the event that the complainant is not satisfied with the outcome of the investigation of his complaint, they may lodge a complaint in writing with the Office of the Arbiter for Financial Services.

Office of the Arbiter for Financial Services
First Floor, St Calcedonius Square
Floriana FRN1530
Malta - www.financialarbiter.org.mt

5. Complaints Register

Every complaint received by BROKR shall be logged into the Complaints Register, which is maintained by the Compliance Officer.

6. Complaints Reporting

Details of complaints received will be reported during Board meetings.

7. Record Retention

A full record of the complaint must be retained for five years.

8. Conflicts of Interest

The Compliance Officer of the Company is responsible for the Complaints Management Function. The Company places a lot of importance on the integrity record of the person occupying these functions to execute the functions independently and to always act in the sole interest of equity and the facts at hand. Considering the size and complexity of the BROKR's business there is no justification to consider separating these functions. Moreover, segregation is achievable on the basis of the integrity of the person occupying these functions. In any event any conflict of interest issues that may be detected in the execution of these functions shall be elevated to the Board of BROKR through the compliance reports.

BROKR

Appendix 1 – Formal Complaint Template

Please complete this template and kindly send to Dr. David Griscti at 168, St. Christopher Street, Valletta, VLT 1467, Malta or by email on dgriscti@dglawfirm.com.mt

Details of Complainant (Natural Person)
Name & Surname:
ID / Passport No.:
Address:
Mobile no.:
Landline no.:
E-mail:

Details of Complainant (Legal entity)
Company name:
Name and surname of responsible officer:
Company Address:
Mobile no.:
Landline no.:
E-mail.:

Please provide a description of the complaint:

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Date: _________________________