

COMPLAINTS POLICY OF XTB INTERNATIONAL LIMITED

1. Introduction

- 1.1. XTB International Limited ('XTB', 'The Firm') is authorized and regulated by the Financial Services Commission in Belize as a registrant under the Securities Industry Act 2021 (Registration No.: 6442514). XTB is a registered company in Belize (Registration No.: 000000587). Company address: 35 Barrack Road, 2nd Floor, Belize City.

2. Interpretation of Terms

- 2.1. Unless the context requires otherwise, all terms included in this Policy will have the meaning given to them herein. Where the context requires, (a) words importing the singular shall include the plural and vice versa and (b) words importing the masculine shall include the feminine and vice versa.

3. Purpose & Scope

- 3.1. The Policy sets out the internal complaint resolution process and procedures the Firm has in place, maintains and follows to ensure all complaints are investigated and resolved appropriately.
- 3.2. The Firm's Complaints Handling Procedures represent its' client-focused approach and commitment to be fair and transparent and is designed to ensure that any significant written expression of dissatisfaction, and whether justified or not, sent from a Client to the Firm is investigated and resolved fairly, consistently and promptly.
- 3.3. All complaints will be treated confidentially.
- 3.4. The Firm will make best efforts to resolve complaints internally in a quick and effective manner.

4. Definition of a Complaint

- 4.1. A complaint is an expression of dissatisfaction addressed to the Firm by a Client.
- 4.2. All complaints submitted to the Firm must contain all the necessary information required for a proper analysis of the submission, and in particular, must include the following:
 - I. Client's forename and surname;
 - II. Client's account number;
 - III. the date and time of when the issue arose;
 - IV. Client's requests;
 - V. any supporting evidence (if applicable);
 - VI. an accurate description of the issue;
 - VII. depending on the subject of the complaint, the Firm may request additional clarification or information necessary for the proper verification of the submitted claim. Such details shall be deemed part of the essential information required to process the complaint.

For complaints submitted directly through the Online Complaint Form, necessary technical logs are automatically captured and transmitted securely to the Firm. Where the proper analysis and verification of a complaint depend on these technical logs, submission through the Onfile Complaint Form is mandatory. If such an issue is reported through other channels, the Firm will require the Client to resubmit the complaint via the Onfile Complaint Form.

5. Complaints Policy

- 5.1. All claims must be submitted no later than 60 days from the occurrence of the alleged breach of contractual or statutory requirement. Claims submitted after that period will not be reviewed and shall be rejected.
- 5.2. All complaints must be in writing and must be filed via an online form available for Clients in the XTB app Help Center and on the trading platform ("Onfile Complaint Form").
- 5.3. In specific cases, should the Firm request information from the Client, the Client shall be required to respond to the Firm within a period of 14 business days.
- 5.4. The Firm reserves the right to decline the investigation of any complaint that fails to comply with the requirements set forth in Sections 4.1 and 4.2. in cases where, despite a request to provide the missing information for the complaint, the Client fails to contact the Firm within a period of 14 business days. Consequently, the matter may remain unresolved.
- 5.5. Complaints will be handled independently by a Customer Service team member unconnected with the complaint and who will have sufficient authority to resolve it or access to someone with sufficient authority.
- 5.6. The Firm will treat each complaint with due care and ensure a fair outcome is reached.
- 5.7. The Firm will send an initial response to the Client without a delay but no later than within fourteen (14) business days.
- 5.8. The Firm will make best endeavors to resolve all complaints and provide a final response "Response Letter" with a proposition of the resolution of the complaint matter to the Client within 30 business days. However, if additional time or information is required to investigate the complaint, a holding response will be sent, making clear that the matter is still under investigation and an update in respect to the complaint will be made with no delay.
- 5.9. Upon conclusion of the investigation the Client must be informed of the resolution in writing as soon as possible and at the very least within the timeframe communicated to the Client. The Firm will communicate the outcome of the Investigation in writing via e-mail along with the reasons for reaching a particular decision.
- 5.10. In cases where the Client's complaint is deemed valid but the Firm's offer is different than the demands expressed by the Client, the Firm shall extend an offer to the Client, which the Client is required to accept promptly, and in any event, no later than within thirty (30) days from the date the offer is provided to the Client in writing. In the event that the Client fails to provide a response, the complaint shall be considered inactive and Closed until further communication from the Client.
- 5.11. If the Client is not satisfied with the outcome of the proposed resolution, the Client reserves the right to appeal the decision not later than within thirty (30) days from the day the decision on the claim resolution is received by the Client. The appeal should be made via email to cs_int@xtb.com/cs_latam@xtb.com. Upon receipt of the appeal, the complaint will be reassessed and a response will be provided no later than within fourteen (14) business days. However, if additional time or information is required to investigate the appeal, a holding response will be sent,

making clear that the matter is still under investigation and an update in respect to the appeal will be made with no delay.

- 5.12. If the Client is still not satisfied with the outcome of the response to the appeal, the complaint can be referred to the Firm's Compliance Officer, not later than within thirty (30) days from the day the decision on the claim appeal resolution is sent to the Client. A request should be made via email to cs_int@xtb.com/cs_latam@xtb.com. A response by the Compliance Officer will be provided no later than within fourteen (14) business days. However, if additional time or information is required to investigate the complaint, a holding response will be sent, making clear that the matter is still under investigation and an update in respect to the complaint will be made with no delay.
- 5.13. If the Client is still dissatisfied with the response from the Firm, the Client may also refer the complaint to the Financial Services Commission of Belize via the online complaints form at the Commission's website at <https://www.belizefsc.org.bz/>.