Complaint Handling Policy

ApogeeX Capital (MU) Limited (hereinafter the "Company") aims to provide superior services t o all of its clients.

The Company has appointed a Compliance Officer to efficiently handle any complaints from the Clients. This is to allow the Company to resolve and apply mandatory measures to avoid any recurring issues.

Definition

The Company classifies a complaint as any objection and/or dissatisfaction that the Client may have with regards to the provision of the services provided by the Company. A complaint form is enclosed at the end of this policy.

Complaint Handling Unit

The Company has established a complaint handling unit responsible for receiving, investigating, and resolving Client complaints. The unit ensures accessibility, fairness, accountability, efficiency, and timeliness in complaint handling.

Clients may lodge complaints by completing the complaint form -**Appendix 1**

Procedure

The Compliance Officer shall be responsible for handling client complaints, except in the case where the complaint involves the Compliance Officer, whereby the complaint shall be handled by the Representative Officer.

The Client may register a complaint by completing the complaint form, using any of the following options:

- **Email:** bd@axfx.com

Complaints can be lodged directly with the Complaint Handling Unit using any of the provided methods mentioned above.

1. When the Compliance Officer receives the Client's complaint an initial response letter will be sent to the Client immediately during business hours and no longer than 2 business days stating that the complaint has been received and is being dealt with. This letter will also include the following:
    a. the timeframe by when the client will receive a response;
    b. details of a designated person to contact regarding the complaint; and
    c. reference number for the complaint.

2. The Company will attempt a final response within 3 business days, however in case we are still not in a position to resolve the issue then the Compliance Officer will notify you in writing stating the reasons for the delay and indicate an estimated time to resolve the issue.
3. A final response should be provided to the Client within 21 business days, the latest from the date he submitted his complaint.
4. For grossly complicated complaints requiring extended investigation, the Client will be informed in writing, with an extended timeline of 90 business days.

5. In the case where the complainant is still not satisfied with the Company's final response, then the complainant can refer his complaint with a copy of the Company's final response to the Financial Services Authority (FSA) in Seychelles for further examination.

The contact details for the Financial Services Authority (FSA) in Seychelles are set out below:

Email:	bd@axfx.com
Website:	https://axfx.com/

Information to be provided after investigating a complaint

Following the closure of a complaint, the Company shall provide in writing to the client the following information:

(a) an overview of the complaint;
(b) issues which have been considered in the investigation;
(c) outcome of the investigation;
(d) any applicable remedy and the timeframe to the client to confirm acceptance or non-acceptance of the proposed remedy;
(e) the client's right to lodge a complaint to the Competent Authority, if unsatisfied with the remedy; and
(f) details of the Competent Authority including the telephone number, e-mail address and postal address.

Client Records

The Client should provide all relevant documentations as well as any additional information requested by the Compliance Officer in order to ensure all records are collected and the complaint is properly resolved on time.

The Company will maintain detailed records of each complaint, including:

a) Reference number
b) Client's details (name and contact details)
c) Complaint details (type, description, and date)
d) Demographics (gender, age etc.,)
e) Classification (as per an internal classification system)
f) Investigation and resolution actions
g) Response provided to the client

All records will be kept safe as per local requirements and for a period of seven (7) years.

Discrimination against Clients who have lodged complaints

The Company will not penalize or discriminate against Clients who exercise their rights by lodging complaints.

Confidentiality and Conflict of Interest

The Company will maintain strict confidentiality when handling all Clients' complaints. Complaints involving a conflict of interest will be handled by a designated independent officer.

[The complaint form can be found in the next page]

Appendix 1

Complaint Form

A. Client Information:

Name:	Account Number:
Address:	Telephone Number:

B. 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 any other relevant documentation that may help us to handle the complaint.*
- *Possible documentation to be provided (client statement, correspondence with the Company as well as any other supporting documentation to be requested by the Compliance Officer which is relevant to the Client's complaint)*

Date and place

Client Signature

For internal use only:	
Complaint Received By:	Date:
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 Compliance Officer:	Date:

Last updated: September 2026