

COMPLAINTS HANDLING POLICY

LEXIM TRADING DMCC

Updated on 23 October 2024

1. PURPOSE

- 1.1 This Complaints Handling Policy ("**Policy**") is a guide for the Complaint Handling Team, including the Complaint Handling Officer of Lexim Trading DMCC ("**Lexim**"), to handle Customer Complaints and improve and develop service systems for handling Complaints.

2. SCOPE

- 2.1 This Policy includes the process of resolving Customer Complaints related to trading virtual assets through Lexim's platform. It covers activities such as facilitating order execution and providing market information. The Policy focuses on the services provided by Lexim. It aims to ensure that Customer Complaints regarding these activities are handled effectively and in compliance with applicable laws and regulations.

3. DETAILED PROCEDURES

- 3.1 Lexim may receive Customer Complaints through multiple channels:

- (a) Email: support@lexim.gold;
- (b) Contact Number: +971 (0)4 375 1987;
- (c) Contact Form: <https://www.lexim.digital/contact>; and/or
- (d) Postal Address: Lexim Trading DMCC, Mazaya Business Avenue 2201, Tower AA1, First Al Khail St Jumeirah Lake Towers, Dubai, United Arab Emirates.

- 3.2 Verification of Customer identity: The Complaint Handling Team will request the user ID, registered name, date of birth, and email address to verify the identity of the Customer, or correspond directly with the Customer using their registered email.

- 3.3 Lexim will take reasonable steps to identify and remedy any recurring or systemic problems arising from complaints. This includes:

- (a) Conducting a thorough investigation to determine the root cause of the issue, distinguishing between Customer errors and errors attributable to Lexim as the service provider;
- (b) Analysing the causes of complaints to identify common root causes that may affect not only the specific issue raised but also other services, products, or processes, including those related to virtual assets activities;
- (c) Once the investigation is complete, Lexim will promptly address the issue through an appropriate resolution method, correcting any identified root causes to prevent recurrence; and
- (d) If the complaint is determined to be invalid due to a lack of evidence or is found to result from a Customer's error, Lexim will communicate this decision clearly to the Customer, providing a detailed explanation of the findings.

- 3.4 Handling Customer Complaints:

- (a) Complaint Handling Team must acknowledge all Complaints within one (1) week of receiving them;
- (b) Complaint Handling Team must respond to Customer Complaints promptly after receiving them during working hours (Monday to Friday: 08.00 AM until 6:00 PM);
- (c) Show empathy towards the Customer's issue and ensure they feel heard and understood;
- (d) If the problem is caused by Customer error and can be immediately resolved, assist the Customer in resolving the issue and proceed to close the Complaint;

- (e) For Customer errors that require further escalation, the Complaint Handling Team will promptly escalate the Complaint to Lexim's senior management. The Complaint Handling Officer will provide an update to the Customer within four (4) weeks of the Complaint being made. In extraordinary circumstances where the resolution is delayed, the Complaint Handling Officer will inform the Customer about the reasons for the delay and provide regular updates. The Complaint Handling Officer will strive to resolve the Complaint no later than eight (8) weeks from the Complaint date;
- (f) If the problem is caused by Lexim's error and can be immediately resolved, the Complaint Handling Team will assist the Customer in resolving the issue and proceed to close the Complaint;
- (g) For Lexim's errors that require further escalation, the Complaint Handling Team will promptly escalate the Complaint to Lexim's senior management. The Complaint Handling Officer will provide an update to the Customer within four (4) weeks of the Complaint being made. In extraordinary circumstances where the resolution is delayed, the Complaint Handling Officer will inform the Customer about the reasons for the delay and provide regular updates. The Complaint Handling Officer will strive to resolve the Complaint no later than eight (8) weeks from the Complaint date; and
- (h) In exceptional cases where a Complaint cannot be resolved within eight (8) weeks, Lexim must inform the Customer about the reasons for the delay, provide regular updates on the status of the Complaint, and offer an estimated time for resolution. Lexim is committed to resolving such Complaints as soon as practicable and minimising any delays.
- (i) In the event that a Customer chooses to pursue legal action through litigation or other formal legal proceedings regarding the subject matter of their Complaint, Lexim will suspend the internal Complaints handling process for that particular Complaint.
 - i. Upon receiving notification or evidence that the Customer has initiated litigation, the Company will promptly inform the customer that the internal Complaints process is suspended.
 - ii. The Complaints handling process may be reinstated if both parties agree to withdraw from or resolve the legal proceedings, allowing the matter to continue through the internal resolution process.
 - iii. Where appropriate, Lexim may suggest alternative dispute resolution mechanisms (e.g., mediation) to the Customer, even during litigation, in an attempt to reach an amicable resolution.
 - iv. In cases where a serious Complaint is upheld and deemed to have regulatory implications, Lexim may promptly notify the appropriate regulatory authority in accordance with applicable legal and regulatory requirements. This notification may occur if the nature of the Complaint suggests a potential breach of regulatory obligations, or where regulatory reporting is otherwise required.

3.5 Service Level Agreement ("SLA"):

- (a) Acknowledge and respond to all Complaints within one (1) week; and
- (b) Resolve Complaints within four (4) weeks, with the option of an eight (8) weeks resolution timeline in extraordinary circumstances, accompanied by updates to the Customer.

3.6 Service Guarantee:

- (a) The Complaint Handling Team will send an email to confirm the Complaint's resolution within seventy-two (72) hours since the last email was sent;
- (b) If the problem persists, the Complaint Handling Team will send a reminder email within 72 hours since the first reminder email was sent; and
- (c) If no further communication is received, the Complaint will be considered resolved, and the Customer will be advised to open a new email for future Complaints.

3.7 Contact Information: The Complaints Handling Policy and Lexim's website clearly state Lexim's contact information, including phone number, email address, and postal address.

- 3.8 Document Review:
- (a) The board of directors will periodically review on the Complaint handling processes to ensure their effectiveness and compliance with the Policy and applicable regulations.
 - (b) The outcomes of investigations will be documented and communicated to relevant stakeholders, including affected Customers, management, and the board. If necessary, appropriate actions will be taken based on investigation findings, including process improvements.
- 3.9 Compliance with Regulations: Comply with all relevant laws and regulations related to Customer Complaints, including any requirements to report Complaints to regulatory bodies or other authorities.
- 3.10 Confidentiality: Treat all Customer Complaints and related information with the utmost confidentiality, following Lexim's Privacy Policy and applicable laws and regulations.
- 3.11 Training and Development: Provide ongoing training and development for the Complaint Handling Team and the Complaint Handling Officer to enhance their skills and knowledge in effectively handling Customer Complaints and improving Lexim's service systems.
- 3.12 Continuous Improvement: Commit to continuously improving the Complaint Handling procedure and service systems to achieve the highest level of Customer satisfaction.
- 3.13 Lexim shall keep a record of:
- (a) all complaints received from their clients;
 - (b) all measures they have taken in response to complaints; and
 - (c) the resolution of all complaints.
- 3.14 Handling Complaints Involving Third-Party Entities:
- (a) Complaint Handling Team will receive and acknowledge Complaints involving third-party entities on behalf of the Customer;
 - (b) Promptly communicate and liaise with the relevant third-party entity to address the Complaint;
 - (c) Ensure timely updates on the progress and resolution of the Complaint to the Customer; and
 - (d) Maintain oversight and accountability for the handling and resolving of Complaints involving third-party entities in compliance with applicable regulations and laws.

[Appendix to follow]

APPENDIX - A

Term	Definition
Complaints Handling Team	means the employees, representatives, or the Complaints Handling Officer of Lexim assigned to assist in the receipt, investigation, resolution, and documentation of Complaints.
Complaints Handling Officer	means the individual(s) appointed by the Lexim's Chief Executive Officer responsible for overseeing, managing, and resolving Complaints.
Customer Complaints Handling	refers to the service provided by Lexim that works as a centre of information and service delivery for Customer Complaints.
Customer Satisfaction Survey	refers to the data collection method used to determine Customer satisfaction with the service provided by Lexim.
Complaint	refers to complaint, criticism, or expression of dissatisfaction conveyed either orally or in writing about the performance of services or products used by Customers.
Customers	refers to an individual or group that uses products or services provided by Lexim.