

CC KENYA SECURITIES LTD

**Complaint Handling and Dispute
Resolution Policy**

Document Version 0.1

Policy Owner	Head of Compliance & MLRO
Issuing Department	Compliance
Approved by	Board of Directors
Last Approved Date	July 2025
Next Review Date	July 2026
Scope of Policy Application This Policy is relevant to CC Kenya Securities Ltd	
Relevant Business Areas and Individuals: All employees which include permanent, contract and temporary and those under contract for services within CC Kenya Securities Ltd or an affiliate as an outsourced service supplier.	

Version Control

Version No.	Revision Date	Description of Changes and Reason	Author	Approved by	Date Approved
0.1	N/A	Creation	Compliance	Board	July 2025

1. DEFINITIONS

Word / Term	Definition
Board	Board of Directors of CC Kenya Securities Ltd
Business day	Any day other than a Saturday, Sunday, or a public holiday recognized under the laws of the Republic of Kenya, on which banks are generally open for business in Nairobi.
Company	CC Kenya Securities Ltd
Companies Act	Companies Act, No. 17 of 2015 (Kenya)
Complaints	Specific requests or claims related to the performance, services or products of the Company, which object to the performance or allege negligence by the Company and lodge a relevant, specific, and clear demand. For the avoidance of doubt, requests for general information, opinions, or explanations regarding the operation or services of the Company, which do not allege a deficiency, misconduct, or failure in service, shall not constitute a complaint.
Complainant	A natural or legal person, a company without legal entity or other organization that requires services of the Company or the addressee of information or offer related to the service;
Employees	All employees permanent, contract and temporary and those under a contract for services with the Company or an affiliate of the Company as an outsourced services supplier
Person	A natural person or a legal person
Policy	CC Kenya Securities Ltd's Complaint Handling Policy
Republic	The Republic of Kenya

2. OVERVIEW

This Policy establishes the goals, duties, and essential complaint management criteria. It guarantees that CC Kenya Securities Ltd (trading as Capital.com and hereinafter referred to as the “**Company**”) handles complaints in a manner that duly considers the complainants' interests, the Company's interests, and the pertinent requirements of regulatory authorities, where applicable. This policy sets principles for handling and documenting complaints and defines roles and responsibilities.

3. SCOPE

This Policy regulates effective, clear and fast handling of complaints submitted to the Company in relation to the performance and procedures of the Company. The Company maintains records of complaints and measures taken for expedient complaint resolution, in line with applicable legislation, rules and/or regulations.

4. INTRODUCTION

The Company is an authorised firm registered with the Capital Markets Authority of Kenya (hereinafter referred to as the “**CMA**”). The Company holds a valid licence to act as an agent or principal and market maker.

Complaints present an opportunity to address sources of dissatisfaction and enhance the relationship with current, past and potential clients. Additionally, the Company maintains a steadfast objective of improving its products, processes, and competencies. Employing appropriate and meaningful documentation and conducting systematic analysis is crucial to ensure effective learning from complaints.

5. COMPLAINTS

In the event that any customer is dissatisfied with the Company’s services or has a grievance or query regarding their account or activity with the Company, the Customer Support Department may be contacted via live chat, e-mail, or telephone. All such communications are recorded and assessed to determine whether they constitute a complaint under this Policy.

The Customer Support Department will determine if the query/grievance can be resolved immediately or if it requires further investigation. If the query/grievance cannot be resolved immediately, the Company will address and seek to resolve it promptly, with an initial response provided as soon as reasonably practicable and, where possible, within 2 (two) business days.

Customers dissatisfied with the response to their grievance or query can escalate the matter by contacting the Compliance Department.

In the context of the Company, a complaint refers to any form of communication received from a client, former client, or non-client that explicitly highlights specific shortcomings or expresses general dissatisfaction with the client relationship and/or the Company. Such communication constitutes a complaint regardless of the medium through which it is received and is directed to the Compliance Department for review and resolution..

The classification of a communication as a complaint is not contingent upon whether the recipient perceives it as justified. It is also not determined by explicitly using the term “complaint.”

Complaints can be expressed verbally, in written form, electronically (including via live chat), or via email.

Complaints can encompass various aspects, including but not limited to the following:

- (i) Quality of advice or service
- (ii) Handling and processes
- (iii) Pricing
- (iv) Terms and conditions
- (v) Performance
- (vi) Advertising and marketing materials

- (vii) Availability and wait time
- (ix) Confidentiality and data protection

In cases where the recipient of a communication is uncertain about its classification as a complaint, it is necessary to seek clarification from the Compliance Department for further guidance.

6. COMPLAINT HANDLING PROCESSES

ROLES AND RESPONSIBILITIES

The Compliance Officer assumes responsibility for managing formal client complaints, except when the complaint involves the Compliance Officer themselves. In such cases, the complaint will be addressed by the Representative Officer.

When the complaint is submitted by a representative or other duly authorized person, the Company will investigate the legal basis of the submission, which must be presented by the Complainant in a written form acceptable under applicable law. If no authorization is available, the Company will approach the Complainant directly to verify authority and, where appropriate, to progress the complaint.

The Complainant, if possible, should report the event and the date of the occasion subject of the complaint to the Company as soon as possible. This is necessary to enable the Company to investigate the complaint as efficiently as possible.

The following opportunities are available for submitting a complaint to the Company:

- i by mail;
- ii by telephone;
- iii by e-mail;
- iv in writing, including by electronic means

REGISTRATION OF COMPLAINTS

The Company shall register all complaints upon receipt and maintain the record until the complaint is resolved and formally closed. This register shall record at least the following information:

- i. the identity of the customer who filed the complaint;
- ii. the identity of the employee who initially received the customer complaint;
- iii. the department to which the relevant employee relates to;
- iv. the date of receipt of the complaint;
- v. the details of the complaint– full description;
- vi. the extent, where applicable, in financial terms of the potential loss that the customer claims has suffered; and/or
- vii. the date and in summary, the content of the reply of the Company to the said complaint.

The Company pays special attention to avoid collection of data about the complainant with the exception of recording data aimed to settle the complaint. Notwithstanding this,

all personal data obtained in relation to the management of a complaint shall be retained for regulatory and legal purposes for a period of not less than seven (7) years, in accordance with applicable laws.

The Company manages complaints within a transparent system; that can be traced and administered in each and every stage of the procedure.

Unless settled on the spot, the Company records a written memorandum on all verbally submitted complaints. For this purpose, the Company is entitled to use a complaint format or to register the complaint electronically. The Company hands over or mails one copy of the complaint to the Complainant.

The Company records all telephone conversations between the Customer Service and the Complainant and keeps the voice record for the period of 7 (seven) years. The Complainant shall be informed about this at the beginning of the conversation. The Company shall, upon request and subject to legal and data protection requirements, make the relevant recording or an accurate transcript available to the Complainant.

PROCEDURE

To facilitate the handling of their complaint, clients should send an email to compliance.ke@capital.com and provide the following information (where available):

- Trading account number;
- Name/Surname/Email address;
- Date of the event;
- Reason for the complaint (please select one of the following causes):
 - Execution of orders;
 - Quality or insufficiency of the provided information;
 - Terms of contract/fees/charges;
 - General administration/customer service;
 - Issues related to fund withdrawals.
- Any other cause;
- Detailed description of the complaint with relevant supporting evidence;
- Details of the specific person or department within the Company to whom the complaint should be directed (if known).

To effectively handle client complaints, all complaints should be sufficiently detailed and descriptive regarding the events that prompted the complaint. The Company may request further information where necessary to investigate the complaint. Verbal complaints shall be recorded and assessed in accordance with this Policy; however, the Company may request that a verbal complaint be confirmed or supplemented in writing where this is necessary to enable proper investigation.

When a complaint is submitted by another person, or by a method that does not allow the Company to reasonably verify the authority of the submitter, the Company may request written confirmation of authority from the Complainant or the duly authorised person before progressing the complaint.

The Company provides clear, reasoned, and documented responses to complaints, which are communicated to the Complainant in writing. Where the decision refers to any law or regulation, the Company shall include references to the relevant legislation and applicable regulatory provisions in its response. In parallel with informing the Complainant of the decision, the Company shall inform the Complainant of any available escalation or appeal options and, where applicable, the possibility of compensation or remedial action.

PROCESS

1. Upon receipt of the Client's complaint, the Compliance Officer will promptly send a written acknowledgment to the Client within 2 (two) business days.
2. The Company will endeavor to provide a final response within 14 (fourteen) days. However, if the issue remains unresolved, the Compliance Officer will send a written notification explaining the reasons for the delay and provide an estimated timeline for resolving the matter.
3. The Client should receive a final response no later than 30 (thirty) business days from the date of submitting their complaint.
4. If the complainant remains dissatisfied with the Company's final response, they have the option to escalate their complaint by submitting it, along with a copy of the Company's final response, to the CMA for further investigation and examination. The relevant communication channels for the CMA can be found at their website: <https://www.cma.or.ke/contact-us/> or the complainant may send an email to the Regulator by using the prescribed form provided by the CMA. See **Appendix 1**.

MANAGING COMPLAINTS

The Company manages all complaints and Complainants equally, without any discrimination, in harmony with the procedure regulated by this Policy.

The Complaints are handled by:

Customer Service:

If possible, all complaints should be settled without delay. If immediate settlement of a verbal complaint is not possible or the Complainants rejects the solution offered on the spot, an employee of the Company shall record the complaints and the Company's position in a memorandum and forward them to Customer Service, unless the complaint was submitted directly to Customer Service.

Similarly, Company employees forward all complaints submitted in writing to Customer Service. Customer Service shall be responsible for attempting first-level resolution of complaints. The officers of the Customer Support Department will inform the complainant of the appropriate process to follow.

If the Complainant is contacting the Company on behalf of another person, they may be requested to provide evidence of that person's consent or authority. The Company aims to respond to such complaints within 14 (fourteen) business days, depending on their nature,

and to ensure that the maximum resolution timeframe does not exceed thirty (30) business days.

Compliance Officer:

If employees at Customer Services are unable to settle the complaint effectively or within a short period of time, they will forward the complaint to the Compliance Officer of the Company. The Complainant, if he does not accept the solution offered by Customer Service, is also entitled to approach the Compliance Officer directly.

Directors of the Company;

Within the organization of the Company, Directors of the Company represent the highest level of authority in deciding the settlement of complaints. Directors of the Company shall settle those complaints which cannot be managed within the above procedure. They shall take into account the opinion of the Compliance officer of the Company.

The employee of the Company who participated in the measure related to the complaint or made a decision subject of the complaint must not participate in making any decision related to the complaint. Such employee must provide every reasonable help to the Company in the procedure aimed to settle the complaint as soon as possible and in the interest of the Complainant.

CLASSIFICATION OF COMPLAINTS

All complaints must be classified by and then analysed to identify systemic, recurring and single incident problems and trends.

Level 1 – the least serious complaints. The complaint is not resolved at first contact but can be resolved by Customer Service without escalating it to the Compliance Officer or Managing Director.

Level 2 – more serious complaints. The complaint requires escalation beyond Customer Service. The Compliance Officer must be informed of the complaint and shall oversee or provide input, where necessary, to help resolve the complaint.

Level 3 – the most serious complaints. This type of complaint involves material financial impact, regulatory risk, senior management conduct, or reputational risk, and requires the involvement of the Managing Director and, where appropriate, the Board of Directors.

SETTLEMENT OF DISPUTES

When disputes between the Company and the Complainant cannot be settled through the internal complaint handling procedure, the Complainant may lodge an appeal with the Capital Markets Authority of Kenya (CMA) for further review, so that any required regulatory or enforcement action may be taken. Contact details for the CMA are provided in Appendix 1 to this Policy.

7. GENERAL PRINCIPLES

CLIENT FOCUS

The Company is committed to providing a high standard of service to its clients, which necessitates handling complaints in a prompt, fair, thorough, and respectful manner. The objective of the complaint handling process is to ensure that complainants are treated fairly, that their concerns are properly considered, and that complaints are resolved in an impartial and timely manner. However, it is equally important to consider the legitimate interests of the Company when evaluating complaints, thereby ensuring a balanced, objective, and proportionate approach.

TRANSPARENCY

The Company views complaints as an opportunity to improve client satisfaction and as a valuable source of information for identifying areas where enhancements and improvements are needed in its products, processes, and competencies. Any incentives, whether financial or non-financial, that could discourage the reporting, escalation, documentation, or proper handling of complaints, or result in the concealment or misclassification of complaints, are strictly prohibited. Transparency and integrity in addressing complaints are fundamental principles upheld by the Company.

DATA PROTECTION

Information regarding complaints may only be disclosed to individuals who have a legitimate business need to access such information, in accordance with applicable data protection laws and the Company's policies on confidentiality and information security. All complaint records shall be securely stored and retained for regulatory and legal purposes for a period of 7 (seven) years, or such longer period as may be required by applicable law.

APPENDIX 1

Capital Markets Authority (CMA) Online Complaints Portal:

<https://portal.cma.or.ke/complaints/>