



COMPLAINT HANDLING POLICY

Base Markets

An Investment Dealer (Full-Service Dealer Excluding Underwriting) and Global Business Company Licensed by the Financial Services Commission

License No: GB25204723
Company No: 223521 /GBC
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1. Foreword

Base Markets (the “Company”) is incorporated in Mauritius on the 4th of July 2025 as a private company limited by shares. The Company is regulated by the Financial Services Commission (FSC) of Mauritius under the Financial Services Act 2007 and is licensed as an Investment Dealer (Full Service, excluding Underwriting) with the License Number GB25204723 and a Global Business Licensee, with the Company Number 223521.

The Company has its principal place of effective management in Mauritius, which proposes to conduct its business principally outside Mauritius. The registered office address of the Company is at C/O Credentia International Management Ltd, The Cyberati Lounge, Ground Floor, The Catalyst, Silicon Avenue, 40 Cybercity, 72201 Ebène, Republic of Mauritius.

The Company shall perform such activities and duties as are customarily authorised and performed by the holder of an Investment Dealer (Full-Service Dealer excluding Underwriting) Licence under the Securities Act 2005, in particular, carrying out the following activities:

- Act or hold itself as an intermediary in the execution of securities transactions for clients;
- Trade or hold itself to trade in securities as principal with the intention of reselling these securities to the public;
- Distribute or hold itself out to distribute securities on behalf of an issuer or holder of securities;
- Solicit any investor (person or institutional or body corporate) to enter into securities transactions;
- Give investment advice which is ancillary to the normal course its business activities;
- Manage portfolios of clients.

Base Markets is committed to treating all clients fairly, transparently, and with professionalism. The Company recognises that clients have the right to raise complaints and to have those complaints handled promptly, effectively, and in accordance with applicable regulatory requirements.

This Policy establishes the framework for receiving, investigating, and resolving complaints in line with the standards of the Financial Services Commission (FSC) of Mauritius. Its objectives are to:

- Ensure that all complaints are acknowledged, recorded, and addressed without bias;
- Provide clients with a clear process for submitting complaints and receiving timely responses;
- Ensure compliance with FSC rules on complaint handling, including prescribed timelines;
- Safeguard the Company’s reputation by resolving complaints in a fair and consistent manner.

This Policy applies to all employees, officers, and representatives of the Company. Responsibility for overseeing complaint handling rests with the Compliance Officer, who ensures that complaints are investigated independently and resolved in accordance with this Policy and regulatory requirements.

2. Complaints Procedure

Complaints will be handled in accordance with the requirements of the Financial Services Commission (FSC) of Mauritius. The process is as follows:

- **Receipt and Acknowledgement** – Complaints may be submitted in writing, by email, or by phone. The Company will acknowledge receipt in writing within 5 business days, providing a reference number and outlining the next steps.



- **Initial Review** – Complaints may first be reviewed by the Client Support team to establish the facts and attempt resolution. Where a complaint cannot be resolved at this level, it will be referred to the Compliance Officer for formal investigation.
- **Investigation** – The investigation will be impartial and based on all relevant evidence. The Compliance Officer may request further details or documents from the complainant if required.
- **Resolution and Outcome** – Straightforward complaints will normally be resolved within 28 calendar days. If further investigation is required, the timeframe may be extended, but a final response will be provided within a maximum of 8 weeks from the date of receipt. Where delays occur, the complainant will be informed of the reasons and updated on progress. The complainant will be notified in writing of the outcome, including any corrective action taken.
- **Escalation** – If the complainant remains dissatisfied, they may request escalation to senior management or refer the matter to the Financial Services Commission (FSC).

3. Information Required from Complainants

To allow the Company to investigate and resolve complaints effectively, the following information should be provided:

- Full name and contact details of the complainant;
- Trading account number;
- Description of the complaint, including relevant facts and circumstances;
- Transaction details (ticket or reference number, date, time, instrument);
- Copies of any supporting documents or correspondence.

Grounds for Rejecting Complaints

The Company may decline to process a complaint where:

- The complaint is submitted in bad faith or is clearly abusive;
- The information provided is incomplete or inaccurate;
- The matter falls outside the Company's scope of business (e.g. disputes not related to trading or investment services);
- The complaint duplicates an existing case or has already been resolved;
- The matter is the subject of legal proceedings or arbitration.

Contact Details

Complaints may be submitted to the Company using the following contact details:

- **By Email:** compliance@basemarkets.com
- **By Post:** Base Markets, C/O Credentia International Management Ltd, The Cyberati Lounge, Ground Floor, The Catalyst, Silicon Avenue, 40 Cybercity, 72201 Ebène, Republic of Mauritius
- **By Phone:** +230 467 2000