COMPLAINT HANDLING POLICY

Century Financial Limited
Registered Address: IMAAD Complex, 3rd Floor, Office 12, Ile Du Port, Mahe, Seychelles
License Number: SD235 | Registered and regulated by the Financial Services Authority (the "FSA") in Seychelles.

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1. INTRODUCTION

The Complaints Handling Policy (hereinafter "the Policy") outlines the procedures followed when dealing with complaints received from Clients. Century Financial Ltd (the "Company") undertakes to maintain effective and transparent procedures for the reasonable and prompt handling of complaints received.

The Policy is an integral part of the Client Agreement and contains information on how the Company manages any complaint that may arise in the course of business.

2. DEFINITION OF A COMPLAINT

A Client complaint is an expression of dissatisfaction by a client regarding the services provided by the Company. A complainant is any person, natural or legal person who is presumed to be eligible to have a complaint considered by a firm and who has already lodged a complaint.

Vulnerable Consumer means a person, due to his or her personal circumstances, is susceptible to harm, particularly when the financial services provider is not acting with appropriate levels of care. This may include, but is not limited to, elderly individuals, persons with disabilities, language barriers, or financial distress.

This Policy is in addition to the Company's overarching general obligation to act honestly, fairly, and professionally and in the best interests of its Clients and to comply, in particular, with the principles set out in the relevant legislation when providing investment services and other ancillary services.

The Company may amend this Complaints Handling Policy, and the updated version will apply to you once published on our website. Please ensure that you check our website regularly.

3. SUBMISSION OF A COMPLAINT

In order to file a complaint, please send a description and the date the incident occurred, along with any supporting documentation, to complaints_sc@centuryfinancial.com.

The Complaint must include the following information:

- The Client's full name
- Trading account number
- The affected transaction numbers (if any)
- The date that the issue arose
- An accurate description of the issue
- The damage claimed by the complainant

In the absence of any or all the above requirements, the Company will not be able to investigate the Complaint until the requisite or missing and/or additional information is provided by the Client.

In cases involving a Vulnerable Consumer, the Company is committed to ensuring that complaints are handled with heightened sensitivity, confidentiality, and priority. Where a complaint is submitted on behalf of a vulnerable customer by a third party, the Company may, in appropriate circumstances, waive the requirement of a signed authorisation letter, subject to internal assessment and provided that such waiver aligns with the guidance and discretion of the Competent Authority. Otherwise, a signed Declaration of Authorisation for Vulnerable Consumers must be provided.

4. ACKNOWLEDGEMENT OF COMPLAINT

When a valid complaint is received, the Company shall take into account the particular issues raised and the evidence provided by the Client. Upon receipt of a valid complaint, a written acknowledgment e-mail will be sent to the client within forty-eight hours (48) from the receipt of the complaint.

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This Acknowledgement e-mail will further notify the Client of the response time, designated contact person and unique reference number (URN) which must be used in all future contact with the Company regarding the specific complaint.

The Company may also request the Client to submit further information/document to assist the investigation.

5. HANDLING OF COMPLAINTS

The Company's complaint handling procedures are accessible, independent, fair, accountable, timely, and efficient. Complainants can file complaints and utilize these procedures free of charge.

During the complaint investigation period, the Company may inform the Client of the handling process and request additional information and/or documentation (as necessary) for the complete assessment of the said complaint.

The Company is mandated to carry out a root cause analysis on complaints received, so that larger issues may be identified and addressed, as well as actions are taken to rectify the issues.

The Company ensures that the complaint handling process remains transparent and that the complaint handling staff declare any conflict of interest that arises pertaining to complaints received. If a conflict arises, another employee should be appointed to handle the case when possible. If the conflicted employee is the only available resource to handle the complaint or has to eventually approve decisions made in relation to the complaint, the employee may still handle the matter as long as the conflict of interest is properly declared.

The Company ensures that all complaints received from clients or their representatives are treated with confidentiality at all times.

6. RESOLVING THE COMPLAINT

Following acknowledgment of receipt, the Company will carry out an impartial review of the matter and communicate in writing to the Client the outcome of the Company's investigation and propose remedial actions (if applicable).

The Company will investigate the Client's complaint with the aim of reaching a final resolution of any issue in a timely manner. In accordance with the Complaint Handling Regulations, the Company will endeavour to resolve straightforward Complaints within twenty-one (21) Business Days of the receipt of the complaint. Where a Complaint is grossly complicated and requires more detailed investigation, the Company will inform the Client of progress and endeavour to provide a final response within an extended timeline of ninety (90) Business Days.

The Company may decide to extend the investigation timeframe if the Client takes an extended period to respond or fails to provide a response within a reasonable or designated timeframe. However, if the Client does not cooperate or respond despite reasonable attempts, the Company may consider the matter closed, with all efforts to obtain feedback from the Client documented.

7. ESCALATION OF COMPLAINTS

When the Company reaches an outcome, it shall inform the Client in writing of the outcome of the investigation, including a summary of the complaint, the issues considered, an explanation of its position, any remedial measures the Company intends to take (if applicable) and the timeframe for acceptance/non-acceptance of such remedy.

If the Client remains dissatisfied with the Company's final response or if the Company fails to provide a response within the applicable timeframe, the Client has the right to lodge a complaint with the Financial Services Authority (FSA) as per the procedure stated on https://fsaseychelles.sc/complaint-handling.

The Client should note that FSA requires that a complaint handling form available at https://fsaseychelles.sc/other-fsa-documents/complaint-form/download, be duly completed and submitted to FSA before the complaint can be considered. The complaint handling form may be submitted through any of the following ways:

1) Email address:	complaints@fsaseychelles.sc
2) Formal letter addressed to:	The Chief Executive Officer Policy (Information & Communication Unit) Financial Services Authority Bois De Rose Avenue P.O Box 991, Victoria Mahé, Seychelles
3) Hand-delivered directly to the Authority:	Bois De Rose Avenue, P.O. Box 991, Victoria, Mahé, Seychelles

8. MONITORING OF COMPLAINTS AND RECORD KEEPING

The Company maintains a complaint registry to record and monitor all complaints received until they are resolved. The registry serves as an up-to-date complaint record and shall include the following information:

i. Complaint Reference Number
ii. Date of Complaint Received
iii. Date of Acknowledgement sent to the complainant
iv. Date of incident
v. Name of the Client who filed the complaint
vi. Account Number of the Client
vii. Product/service concerned
viii. Address of the Client
ix. Contact Details of the Client
x. The means of communication by which the complaint was lodged
xi. Type of Complaint/ Complaint classification
xii. Investigation undertaken
xiii. action taken to resolve the complaint
xiv. Officer/Department handling the complaint
xv. Date of Resolution
xvi. Outcome of Resolution
xvii. Summary of the Company's response to the complaint
xviii. Status of Complaint
xix. Review of the Complaint

Following resolution, all complaint-related records, including correspondence, supporting documentation, internal notes, and investigative findings, shall be retained for a minimum of seven (7) years in accordance with FSA record-keeping requirements and applicable legislation. During this retention period, records shall remain protected, secure, and accessible only to authorized personnel.

9. RESIDENT COMPLAINTS LIAISON OFFICER

The Company shall maintain a dedicated Resident Complaints Officer responsible for the effective oversight and administration of the complaints handling process as outlined in this Policy.

The Complaints Officer will ensure that all complaints are managed with independence, objectivity and in a timely and efficient manner. This includes overseeing the investigation and resolution of complaints, ensuring appropriate communication with complainants throughout the process and maintaining the overall integrity and effectiveness of the Company's complaints handling framework.

The Complaints Officer is also tasked with monitoring trends, identifying recurring issues, and contributing to the continuous improvement of the complaints management process.

The Company ensures that all relevant employees, including the Resident Complaints Officer and other staff involved in complaint handling, receive regular training to manage consumer complaints in an effective and time-bound manner. The Company shall also provide the necessary resources to its employees to enable them to carry out their responsibilities efficiently.

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