HoxtonWealth Europe

Client Complaints Policy

October 2026

Hoxton Wealth (Europe) Ltd, previously Hoxton Capital Management (Europe) Ltd is authorised and regulated by the CySEC,
with licence no. 432/23 and Company Registration no. HE417287
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Version Control

Version	Board Approval Date	Document owner	Description of Changes
V1	02 July 2024	Compliance Officer	Initial version
V2	23 December 2025	Compliance Officer	Policy structure refined and aligned with CySEC requirements. Added definition of a complaint, version control table, updated form layout, and updated the Complaints Register template.
V3	21 October 2026	Compliance Officer	Updated to reflect the change of the Company's name to Hoxton Wealth (Europe) Ltd, its inclusion in the Hoxton Wealth Group and the CySEC approval letter ref. 7.1.623 dated 4 August 2026.

1. Introduction

Hoxton Wealth (Europe) Ltd, formerly Hoxton Capital Management (Europe) Ltd, (hereinafter referred to as "the Company") is registered in Cyprus under registration number HE417287 and is authorised and regulated by the Cyprus Securities and Exchange Commission (CySEC) under Licence No. 432/23.

The Company is licensed to provide the investment services of 'Investment Advice' and 'Reception and Transmission of Orders' to Retail and Professional Clients, in accordance with the Provision of Investment Services and Activities and Regulated Markets Law of 2017 (Law 87(I)/2017) in relation to the following financial instruments:

- Transferable Securities
- Money Market Instruments
- Units in collective investment undertakings

The Company does not provide any ancillary services as defined in the Law.

This Client Complaints Policy (the "Policy") outlines the framework and procedures the Company applies to ensure that all client complaints are handled promptly, fairly, and transparently, and that appropriate corrective actions are implemented where necessary.

The Company acknowledges that effective, fair and timely handling of complaints is integral to investor protection, compliance with the applicable regulatory framework, and the maintenance of client confidence, contributing to the continuous enhancement of the Company's operational and governance framework.

This Policy has been established in accordance with the CySEC and ESMA regulatory framework, including CySEC Circular C338 and the relevant provisions of MiFID II, for the proper and effective handling, recording, and reporting of client complaints by Cyprus Investment Firms.

2. Scope and Objective

This Policy applies to all Retail and Professional Clients, including prospective clients, who may wish to submit a complaint regarding the investment or ancillary services offered by the Company.

Lodging a complaint and subsequent handling of the complaint by the Company are provided free of charge.

The Policy's objectives are to:

- Ensure that all complaints are handled fairly, efficiently, and consistently;
- Establish a clear internal process for the receipt, registration, investigation, and resolution of complaints;
- Ensure that complaints are addressed without undue delay, with appropriate communication and transparency throughout the process;
- Identify and address root causes of complaints to prevent recurrence and improve the quality of services; and
- Maintain compliance with CySEC and MiFID II requirements for the proper documentation and reporting of complaints.

This Policy applies to any expression of dissatisfaction, whether oral or written, submitted by or on behalf of a client or potential client in connection with the provision, or failure to provide, investment services by the Company or to the conduct of the Company, which alleges or implies that the Company has failed to comply with its contractual, legal, or regulatory obligations, including those arising under the CySEC regulatory framework and MiFID II.

3. Legal Framework

This Policy has been developed in line with the legal and regulatory requirements applicable to Cyprus Investment Firms (CIFs) for the fair and transparent handling of client complaints.

The Company complies with the following s subject to and acts in compliance with the following regulatory framework:

- Law 87(I)/2017 regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets and other related matters, as amended, replaced or repealed from time to time (the "Law");
- Directive 2014/65/EU of the European Parliament and of the Council on markets in financial instruments, as amended, replaced or repealed from time to time ("MiFID II");
- CySEC Circular C338 on the handling and reporting of client complaints.

In accordance with this framework, the Company maintains effective procedures to receive, record, and resolve client complaints promptly, fairly, and independently.

Complaints are documented, retained for at least five (5) years, and reported to CySEC monthly, including the submission of "nil reports" where applicable.

4. How to Lodge a Complaint

Clients may submit a complaint to the Company through any of the following channels:

- By Email: complaints@hoxtonwealth.eu
- By Post: Hoxton Wealth (Europe) Ltd, Mesogiou 15, Upper Floor, 7041, Larnaca, Cyprus
- By Telephone: +357 24332522
- In Person: At the Company's registered office during business hours

Complaints may be submitted either in written or oral form. However, clients are encouraged to submit them in writing to ensure proper documentation and traceability.

All complaints received are recorded immediately by the Compliance Officer and AML Officer ("Compliance Officer"), which is responsible for the day-to-day acknowledgment and initial handling of the complaint. The Compliance Officer reviews and oversees the handling of each complaint.

The complaints handling process and related contact details are published on the Company's website in a clear and accessible manner.

On request, or when acknowledging receipt of a complaint, the Company provides written information on its complaints-handling process, including how the complaint will be dealt with, indicative timelines, and the client's options to escalate the matter to the Financial Ombudsman of the Republic of Cyprus, alternative dispute resolution mechanisms (where applicable), or the relevant courts.

Information on the Client's right to refer unresolved complaints to the Financial Ombudsman of the Republic of Cyprus and additional options including applicable time limits and contact details, is provided in Section 8 of this Policy.

CySEC, as the Company's competent supervisory authority, does not examine or resolve individual complaints or disputes. Any complaint submitted to CySEC is considered by CySEC in the context of its supervisory responsibilities and mandate.

5. Information Required

To enable the Company to assess and resolve a complaint promptly and effectively, the complainant should provide the following information:

- Full name and contact details (including telephone number and email address);
- Account or reference number;
- Date of the incident or transaction concerned;
- How the complaint was submitted (email, post, telephone, or in person);
- Description of the issue and circumstances giving rise to the complaint;
- Copies of any relevant supporting documents; and
- Any desired outcome or remedy sought (if applicable).

The Company may request additional information where necessary to complete its investigation. Failure to provide adequate details may delay the resolution process.

6. Complaint Handling Procedure

The Company ensures that all complaints are handled promptly, fairly, and transparently, in accordance with the principles of good governance and client protection.

6.1. Acknowledgment

- Upon receipt of the complaint, the Company will acknowledge it within five (5) business days and provide or refer to clear information on the complaints-handling process, including the next steps and indicative timelines.
- The acknowledgment will include the unique reference number assigned to the complaint and the name and contact details of the person responsible for handling it.

6.2. Registration

- Each complaint is recorded immediately in the internal Complaints Register by the Compliance Officer.
- The record includes all relevant information, such as the date received, method of submission, client details, and a brief summary of the issue.

6.3. Investigation

- In the normal course, the Compliance Officer conducts the factual investigation of the complaint, gathering all relevant evidence and information from the business areas involved.
- The Compliance Officer reviews the findings of the investigation to ensure it has been carried out impartially, objectively and independently, and confirms that the employee or department subject to the complaint is not responsible for, nor involved in, the final decision-making process regarding the complaint.
- Where the Compliance Officer is conflicted or otherwise lacks independence in relation to the matter, the investigation shall be assigned to the Deputy AMLCO or another suitably independent senior officer, and where necessary escalated to the Board of Directors for oversight.
- The investigation shall be fully documented, and additional information may be requested from the client or relevant departments to ensure a complete and fair assessment.

6.4. Response

- The Company aims to provide a final written response within two (2) months from receipt of the complaint.
- If more time is required, the client will be notified of the delay, the reason for it, and the anticipated date of resolution (not exceeding three months).
- The response will clearly outline the outcome of the investigation, any corrective measures taken, and, if applicable, details of compensation or remedial actions.
- The Company strives to resolve all complaints to the satisfaction of the client wherever possible, in accordance with fairness and regulatory obligations.
- Once the complaint is closed, all relevant documentation and communications are securely retained in line with the Company's record-keeping requirements.

7. Application and Record Keeping

The Company maintains a comprehensive Complaints Register to ensure that all complaints are properly recorded, monitored, and resolved in line with CySEC regulatory requirements.

The Compliance Officer is responsible for maintaining the Complaints Register, ensuring that all complaints received, whether written or verbal, are logged immediately upon receipt and tracked through to resolution.

The Compliance Officer is responsible for maintaining, and overseeing the Complaints Register, monitoring the progress and outcome of each complaint and verifying that all entries are complete, accurate and timely.

Each complaint entry includes, at a minimum, the following information:

- Unique reference number assigned to the complaint;
- Client's full name and contact details;
- Date the complaint was received;
- How the complaint was received (email, post, telephone, or in person);
- Product or service to which the complaint relates (e.g., investment advice or order transmission);
- Brief summary of the complaint;
- Root cause identified during the investigation;
- Name and department of the employee involved, where applicable;
- Date of acknowledgment sent to the client;
- Dates of follow-up communication;
- Date of resolution and closure;
- Details of any compensation or corrective actions taken;
- Magnitude of the alleged or actual loss (if applicable); and
- Confirmation of review and sign-off by the Compliance Officer.

All complaints and related records, including correspondence, investigation notes, and final responses, are retained securely for a minimum of five (5) years.

The Company ensures that records are accessible for regulatory inspection and are stored in a manner that preserves confidentiality and data protection standards.

The Compliance Officer periodically reviews the Complaints Register to identify trends, recurring issues, or systemic weaknesses, and reports findings to Senior Management for corrective action.

8. Escalation and Referral Options

8.1 Out-of-court settlement – Financial Ombudsman of the Republic of Cyprus

If, after receiving the Company's final response, the client remains dissatisfied with the outcome or the complaint has not been resolved within the applicable timeframe, the client may refer the

matter to the Financial Ombudsman of the Republic of Cyprus (the "Financial Ombudsman") for an independent, out-of-court review.

The Financial Ombudsman is the Single Body for the Out-of-Court Resolution of Disputes of Financial Nature established under Law 84(I)/2010 and is competent to examine certain disputes between consumers and financial institutions, including Cyprus Investment Firms, and may seek an amicable settlement or issue a binding decision, including the award of compensation, within the limits provided by law.

It is important that the client contacts the Financial Ombudsman within the time limits laid down in the applicable legislation. In particular, the client should generally refer their complaint to the Financial Ombudsman within four (4) months of receiving the Company's final response, or, if no final response has been provided, within four (4) months from the date on which the Company ought to have provided its final response. Failure to comply with these time limits may result in the complaint being declared inadmissible.

Contact details of the Financial Ombudsman of the Republic of Cyprus:

Financial Ombudsman of the Republic of Cyprus
Address: 15 Kypranoros, 1st floor, 1061 Nicosia, Cyprus
Postal Address: P.O. Box 26722, 1647 Nicosia, Cyprus
Telephone: +357 22848900
Fax: +357 22660584, +357 22660118
Email: complaints@financialombudsman.gov.cy
Website: www.financialombudsman.gov.cy

Clients may submit their complaint to the Financial Ombudsman by hand, by post, by fax, by email, or via the online application form available on the Financial Ombudsman's website.

8.2 CySEC

If the client remains dissatisfied after the internal escalation process, they may contact the Cyprus Securities and Exchange Commission (CySEC) to notify the matter via the online complaint submission form.
CySEC, as the Company's Competent Supervisory Authority, does not examine or resolve individual complaints or disputes. Any complaint submitted to CySEC is considered by CySEC in the context of its supervisory responsibilities and regulatory mandate.

Cyprus Securities and Exchange Commission
19 Diagorou Street, 1097 Nicosia, Cyprus
Tel: +357 22506600
Fax: +357 22506700
General email: info@cysec.gov.cy
Online Submission form: https://www.cysec.gov.cy/en-GB/investor-protection/how-to-complain/
Website: www.cysec.gov.cy

8.3 Court Procedure

In the event the complainant does not wish to accept a decision taken by the Financial Ombudsman, the complainant may, as a last resort, refer the matter to the competent courts. The usual practice is to file a civil action before the District Court.

9. Complaints Management Function

9.1. Responsibilities

The Compliance Officer is designated as the person responsible for overseeing the complaints-handling process and ensuring adherence to this Policy.

In particular, the Compliance Officer is responsible for:

- Receiving, recording, and monitoring all complaints until their resolution;
- Ensuring that complaints are investigated in a fair, objective, and independent manner, separate from the relevant business line involved;
- Identifying, managing, and mitigating any actual or potential conflicts of interest arising in connection with the handling or investigation of a complaint, and escalating such conflicts where appropriate;
- Maintaining and updating the Complaints Register in line with CySEC requirements;
- Reporting complaint statistics and trends to Senior Management and the Board of Directors;
- Submitting monthly complaints reports to CySEC via the Transaction Reporting System (TRS); and
- Identifying root causes, recommending corrective actions, and ensuring timely implementation of remedial measures**.**

In line with the Company's Internal Operations Manual, the Compliance Officer is responsible for the day-to-day handling and coordination of complaints, including communications with clients and relevant internal departments, under the oversight of the Compliance Officer.

9.2. Oversight and Governance

The Senior Management and Board of Directors bear overall responsibility for ensuring the adequacy, effectiveness, and ongoing improvement of the complaints-handling framework.

To discharge this responsibility, they review periodic reports prepared by the Compliance Officer to monitor:

- The number, type, and status of complaints received;
- The timeliness, fairness and independence of complaint resolutions;
- Any recurring issues, patterns or systemic weaknesses identified; and
- The adequacy and effectiveness of corrective actions and remedial measures implemented.

9.3. Internal Audit

The Internal Auditor periodically evaluates the effectiveness of the Complaints Management Function as part of the annual audit plan.

This includes assessing compliance with regulatory obligations, reviewing sample complaint files for accuracy and completeness, and providing recommendations for improvement.

10. Complaints Reporting and Continuous Improvement

The Company ensures that complaints data is accurately recorded, reviewed, and reported in line with CySEC regulatory requirements, and that outcomes are used to improve internal processes and client service.

10.1. Regulatory Reporting

In accordance with CySEC Circular C338, the Company submits monthly complaints reports through the Transaction Reporting System (TRS).

- If no complaints are received during a reporting period, a "nil report" is submitted.

- If any previously reported complaint requires an update, a revised record is submitted accordingly.
- The Compliance Officer is responsible for ensuring that all reporting is complete, accurate, and submitted within five (5) business days following month-end.

10.2. Internal Review and Continuous Improvement

The Compliance Officer prepares periodic reports for Senior Management and the Board of Directors, summarising the number and nature of complaints received, the time taken for resolution, and any recurring issues or trends identified.

This analysis supports ongoing evaluation of the Company's operational effectiveness and client service standards.

Based on the findings, the Company may implement:

- Procedural or control enhancements to prevent recurrence;
- Targeted staff training to address recurring weaknesses; and
- Policy or system adjustments to improve client experience and regulatory compliance.

The Internal Audit and Compliance functions periodically review the effectiveness of these corrective measures to ensure lessons learned are fully integrated into the Company's operations.

11. Investigation Process and Informing the Complainant

The Company ensures that all complaints are investigated objectively and that clients are kept informed throughout the process.

The Compliance Officer is responsible for overseeing the investigation and ensuring that the process is independent of the business area involved.

Clients receive written acknowledgment within five (5) business days of the complaint's receipt, confirming that the matter is under review.

Upon completion of the investigation:

- The Company provides a final written response within two (2) months from receipt of the complaint.
- If more time is required, the client is informed in writing of the reasons for the delay and the expected completion date, which will not exceed three (3) months.
- The final response includes the outcome of the investigation, any corrective or compensatory action (if applicable), and information on the client's right to escalate the matter, including the relevant time limits and contact details, as set out in Section 8 of this Policy.

All correspondence is drafted in clear and straightforward language to ensure client understanding.

12. Reporting to CySEC

The Company complies fully with CySEC requirements for the reporting of complaints in accordance with Circular C338.

- Monthly complaints reports are submitted electronically through the Transaction Reporting System (TRS) within five (5) business days after the end of each month.
- If no complaints are received, a "nil report" is submitted.
- If any previously reported complaint is updated or resolved after the original submission, a revised record is filed.

The Compliance Officer ensures that all reporting is accurate, complete, and in line with CySEC guidance.

13. Policy Violation

All employees are required to adhere strictly to this Policy and the procedures it outlines. Failure to comply may result in disciplinary action under the Company's Code of Conduct.

Any deliberate concealment, delay, or mishandling of a complaint will be considered a serious breach of the Company's compliance obligations and may lead to disciplinary measures, including termination of employment.

The Compliance reports any significant breaches or recurring non-compliance to Senior Management and the Board of Directors for review and remediation.

14. Training

The Company ensures that all relevant employees are adequately trained in the identification, escalation, and handling of client complaints.

Training includes:

- Recognising what constitutes a complaint and how to respond appropriately;
- Procedural steps and timelines set out in this Policy;
- Communication and client service standards during the complaint process; and
- Record-keeping, confidentiality, and data protection requirements.

Refresher training is conducted annually or whenever there are updates in regulatory requirements or internal procedures.

15. Policy Review and Update

The present Policy shall be reviewed annually or sooner if required due to changes in legislation, regulatory guidance, or the Company's operational structure. The Compliance Officer initiates the review and submits any proposed amendments to the Board of Directors for approval.

Once approved, the updated version of the Policy is communicated internally and recorded in the Company's Policy Register, indicating the date of revision and version number.

The Board of Directors retains ultimate responsibility for ensuring the ongoing adequacy, effectiveness, and compliance of this Policy.

Declaration (Client Signature)

I confirm that the information provided above is accurate to the best of my knowledge.

Client Name: _____
Signature: _____
Date: _____