

Complaints Handling Procedure

COMPANY	Elunix Capital Ltd
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SECTION 01

Introduction

- 1.1 Elunix Capital (hereinafter referred to as "the Company") is committed to providing a high standard of service to all of its clients. However, the Company recognizes that there may be occasions when clients feel that the level of service received falls below their expectations.
 - 1.2 The Company is authorized and regulated by the Financial Services Commission (FSC), BVI (License No. SAMPLE/00/0000). This Complaints Handling Procedure has been established in accordance with applicable regulatory requirements to ensure that all complaints are handled promptly, fairly, and consistently.
 - 1.3 For the purposes of this procedure, a "complaint" is defined as any oral or written expression of dissatisfaction, whether justified or not, from or on behalf of a client, relating to the provision of, or failure to provide, a financial service or product, which alleges that the complainant has suffered (or may suffer) financial loss, material distress, or material inconvenience.
 - 1.4 The Company treats all complaints seriously and aims to resolve them in a timely and fair manner. The Company shall not penalize or disadvantage any client for making a complaint.
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SECTION 02

How to File a Complaint

- 2.1 Clients who wish to file a complaint may do so through any of the following channels:
 - Email: Send a detailed written complaint to complaints@elunixcapital.com.
 - Online Form: Submit a complaint through the designated complaints form available on the Company's website at <https://elunixcapital.com>.
 - Post: Send a written complaint by mail to the Company's registered address: Sample Address, P.O. Box 000, Road Town, Tortola, British Virgin Islands.
- 2.2 When filing a complaint, the client should provide the following information to enable the Company to investigate and respond effectively:
 - Full name and trading account number.
 - Contact details (email address and telephone number).
 - A clear and detailed description of the complaint, including the date(s) on which the relevant event(s) occurred.
 - The specific outcome or resolution sought by the client.
 - Any supporting documentation, such as screenshots, trade confirmations, or correspondence.

- 2.3 Complaints may be filed by the client personally or by an authorized representative acting on behalf of the client. Where a complaint is filed by a representative, the Company may require written authorization from the client before disclosing account-specific information to the representative.
- 2.4 The Company encourages clients to file complaints as soon as possible after the event giving rise to the complaint, as delays may affect the Company's ability to investigate the matter fully.

SECTION 03

Acknowledgment and Timeline

- 3.1 Upon receipt of a complaint, the Company will issue a written acknowledgment to the complainant within five (5) business days. The acknowledgment will confirm the details of the complaint, provide a unique reference number, and identify the officer responsible for handling the complaint.
- 3.2 The Company aims to resolve all complaints as quickly as possible. The expected timeframes for resolution are as follows:

Stage	Timeframe
Initial acknowledgment	Within 5 business days of receipt
Simple complaints (resolution)	Within 15 business days of receipt
Complex complaints (resolution)	Within 45 business days of receipt
Final response (maximum)	Within 60 business days of receipt

- 3.3 If the Company is unable to provide a final response within the timeframes set out above, it will inform the complainant in writing of the reasons for the delay and provide an estimated date by which a final response will be issued.
- 3.4 The complainant will be kept informed of the progress of their complaint at regular intervals throughout the investigation process.

SECTION 04

Investigation Process

- 4.1 Each complaint will be assigned to a senior officer within the Company's compliance department who has the authority and competence to investigate and resolve the matter. The assigned officer will be independent of the department or individual that is the subject of the complaint.

4.2 The investigation process will include, as appropriate, the following steps:

- Review of all relevant account records, transaction logs, and platform data.
- Examination of all correspondence and communications between the client and the Company.
- Interviews with relevant staff members involved in the matter.
- Review of applicable policies, procedures, and regulatory requirements.
- Consultation with the Company's legal counsel where necessary.

4.3 Upon completion of the investigation, the Company will issue a final response to the complainant in writing. The final response will include:

- A summary of the complaint as understood by the Company.
- The findings of the investigation.
- The Company's determination of whether the complaint is upheld, partially upheld, or not upheld.
- Where applicable, details of any remedial action or redress offered by the Company.
- Information about the client's right to escalate the complaint if dissatisfied with the outcome.

4.4 Where the Company determines that the complaint is justified, it will offer fair and appropriate redress, which may include financial compensation, reversal of fees or charges, correction of account records, or other remedial action as the Company considers appropriate.

SECTION 05

Escalation

- 5.1 If the complainant is not satisfied with the Company's final response, or if the Company has failed to provide a final response within the prescribed timeframe, the complainant has the right to escalate the complaint to the relevant external dispute resolution body.
- 5.2 The Company is required to inform the complainant of their right to refer the complaint to the relevant financial ombudsman, regulatory authority, or alternative dispute resolution (ADR) scheme in the jurisdiction in which the Company is regulated. Details of the applicable external body will be provided in the Company's final response letter.
- 5.3 The complainant must refer the complaint to the external dispute resolution body within any applicable time limits prescribed by that body. The Company will cooperate fully with any investigation or inquiry conducted by the external body.
- 5.4 Escalation to an external dispute resolution body does not preclude the complainant from seeking legal redress through the courts, although the complainant should be aware that some external dispute resolution processes may require the complainant to waive their right to commence court proceedings in respect of the same matter.

ESCALATION NOTICE

If you are dissatisfied with the outcome of your complaint, you may contact the relevant regulatory authority or external dispute resolution body. For further guidance, please email compliance@elunixcapital.com.

SECTION 06

Record Keeping

- 6.1 The Company will maintain comprehensive records of all complaints received, including the details of the complaint, the outcome of the investigation, and any remedial action taken. These records will be retained for a minimum period of seven (7) years from the date of resolution of the complaint.
- 6.2 The Company's compliance department will conduct periodic reviews of complaint records to identify recurring issues, systemic problems, or patterns that may indicate deficiencies in the Company's products, services, or internal processes.
- 6.3 Where recurring issues are identified, the Company will take appropriate corrective action, which may include revisions to policies and procedures, additional staff training, system enhancements, or changes to product offerings.
- 6.4 The Company will prepare and submit complaint reports to the relevant regulatory authority as required by applicable law, including statistical data on the number, nature, and outcomes of complaints received during each reporting period.

Document	Complaints Handling Procedure
Company	Elunix Capital Ltd
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Complaints Email	complaints@elunixcapital.com

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