

ElevateSphere Holding

Complaints Handling Policy

May 2026



1. Scope:

- 1.1. ElevateSphere Holding (hereinafter the “Company”, “Bexsero Capital”, “We”) aims to provide the upmost professional services to all of its clients. Consequently, the Company established, implemented and maintains a transparent Complaint Handling Policy and procedure for prompt handling of Client’s Complaints.
- 1.2. The Company offers its services via its regulated domain: <https://www.bexserocapital.com/en/>.
- 1.3. The present Complaint Handling Policy (the “Policy”) illustrates the procedure adopted by the Company for the fair and efficient handling of queries, issues as well as complaints received from its clients and the process that a Client needs to follow to submit a query, issue or complaint.
- 1.4. The Company has appointed a Compliance Officer to efficiently ensure the proper handling of any complaints from the clients. This is to allow the Company to resolve and apply mandatory measures to avoid any recurring issues.

2. Definitions:

- 2.1. The Company classifies a complaint as any objection and/or dissatisfaction that the client may have in regard to the provisions of the services provided by the Company. A complaint form is enclosed at the end of this Policy.

3. Initial Procedure:

- 3.1. In case you have any questions regarding our services, we strongly encourage you to reach out to our Customer Support team initially. You can contact our Customer Support through the Company’s official communication channels, such as email at cs@elevatesphere-holding.com and/or through live chat. Depending on the specific nature of your query or issue, if deemed necessary, Customer Support may refer the issue to the appropriate function for the comprehensive review and resolution.
- 3.2. Engaging in direct communication with employees or representatives of the Company outside of Bexsero Capital channels is not qualified as official method of communicating or submitting queries, issues and complaints.
- 3.3. The Company aims to respond and to resolve any queries or issues immediately. Upon the event that your query or issue cannot be resolved immediately, the Company will address such queries within 7 business days. If additional time is required, the Company will notify you accordingly in writing and will further contact you to inform you of the outcome of the investigation.

- 3.4. In case the response provided at this phase is not satisfactory, you may escalate the matter via following the below process:

4. Follow up process:

- 4.1. Subject to the aforementioned, any client who is not in agreement with the initial response and would like to escalate the matter further may complete and submit the complaint form electronically.
- 4.2. The Compliance Officer shall be responsible to ensure the proper handling of client complaints, except in case where the complaint involves the compliance officer, whereby the complaint shall be handled by the Representative Officer.
- 4.3. The client may register a complaint by completing the complaint form using any of the following options:
- 4.3.1. Email to: compliance@bexserocapital.com
- 4.3.2. Postal Address: Suite 201, 2nd Floor, the Catalyst, 40 Silicon Ave, Ebene, Mauritius
- 4.4. The Form must be completed truthfully and accurately, with all the relevant information and supporting evidence. The information required through the Form is indicative and additional information and/or clarification or evidence may be required. The Company reserves the right to request a new submission of the form, if it deems that false and/or misleading information has been inducted.
- 4.5. Upon successful submission of the Form, the Company will provide a written acknowledgement to the client, confirming receipt of the form within 5 business days.
- 4.6. The Company will attempt a final response within 30 business days, however if we are still not in a position to resolve the issue then the Company will notify you in writing stating the reasons for the delay and indicate an estimated time to resolve the issue.
- 4.7. A final response should be provided to the Client within 60 days the latest from the date he/she submitted the complaint.
- 4.8. In case where the complainant is still not satisfied with the Company's final response, then they can refer their complaint with a copy of the Company's final response to the Financial Services Commission of Mauritius (FSC) for further examination as per below:
- 4.8.1. The contact details of the Financial Services Commission of Mauritius are set out below:
- Website: <https://complaints.fscmauritius.org/>
 - Phone: (230) 403-7000
 - Address: Financial Services Commission, FSC House, 54 Cybercity Ebene, Mauritius
 - Email: mail@fscmauritius.org

5. General Information:

- 5.1. Your query, issue or complaint should be clear and accurate, providing the necessary information by demonstrating the facts of the case.
- 5.2. During the handling of complaints, the Company may request additional information and documentation (where necessary, updated KYC documents), hence, your full cooperation is required in order to complete our investigation.
- 5.3. The Company reserves the right to extend the timeframe needed to complete its investigation or put the case on hold or consider it as closed if you fail to respond adequately and/or within reasonable timeline and/or within the timeline we may have indicated and/or if your profile is not fully verified.
- 5.4. The Company strongly recommends that Client's submit their query or complaint in due time from the occurrence of the incident as delaying the process may complicate the review process which may take additional time for the effective completion. Please note that Company will make best efforts to address all cases, but it may choose not to attend to a case if it has become too outdated, such as exceeding a one-year timeframe, in consideration of the availability of the information.
- 5.5. The Company's final response can take one of the following forms:
 - 5.5.1. Acceptance of the complaint and if applicable an offer of redress which can be in the form of an apology (i.e., *not necessarily financial compensation*).
 - 5.5.2. Offer of redress with or without accepting the complaint, but as a gesture of goodwill, in line with the Complaint's Policy for amicable complaint resolution.
 - 5.5.3. Rejection of the complaint with concluding indications and evidence as to this decision.
- 5.6. The submission of a query or complaint is limited to the owner of the account for which the matter relates to. The Company may accept issues brought by representatives (i.e., lawyers) acting on behalf of the Client, as long as the Client has authorised in writing such 3rd party and provides this authorisation as supporting evidence to the Company.
- 5.7. The present policy and procedures may not be applied in cases where a client and/or his/her representative has taken legal action and/or escalated the matter to the courts and/or any other alternative dispute resolution services.
- 5.8. If a client engages in spamming activities such as constant communication with Bexsero Capital employees during the investigation process or after receiving a response and/or final response, submit a complaint or query multiple times or demonstrates hostility towards employees, the Company reserves the right to pursue any action specified in the Client Services Agreement, including suspending the Client's Access to the account and/or terminate the business relationship. These measures are taken to be necessary to uphold a respectful environment for all parties involved in the process.

Date & Location

Client Signature

C. Company's steps:

<i>For internal use only:</i>	
Complaint Received By:	Date:
Acknowledgement sent to Client:	<input type="checkbox"/> Yes - <input type="checkbox"/> No
Informed Client of initial action:	<input type="checkbox"/> Yes - <input type="checkbox"/> No
Final response provided to Client:	<input type="checkbox"/> Yes - <input type="checkbox"/> No
Holding response provided to Client:	<input type="checkbox"/> Yes - <input type="checkbox"/> No - <input type="checkbox"/> N/A