

# CUSTOMER COMPLAINTS MANUAL

## 1. INTRODUCTION AND PURPOSE

This document sets out the procedures for how SB1 Markets AS (“SB1M”) handles complaints. The purpose of this procedure is to ensure that SB1M provides services of high standard as well as to provide adequate protections for the client. This procedure applies to all clients, both retail and professional clients.

This procedure has been prepared in accordance with Circular 4/2019 *Guidelines for Complaint Handling in Banking, Finance, Insurance and Securities Activities issued by the Norwegian Financial Supervisory Authority* (Finanstilsynet), pursuant to which SB1M must ensure its complaints handling procedure is publicly available.

## 2. PROCEDURE

Complaints must be made in writing. If SB1M receives an oral complaint, the client must be instructed to submit a written statement. The statement must be submitted via email to [complaints@sb1markets.com](mailto:complaints@sb1markets.com) or by regular mail to SB1M postal address marked “Complaint”. The complaint must be forwarded to SB1M’s complaints unit without undue delay.

Upon request, SB1M shall provide the complainant with written information regarding the complaints procedure. If the client requires support with drafting a complaint, the client should contact SB1M’s Compliance department that can provide necessary assistance. Enquiries should be sent via email to: [compliance@sb1markets.com](mailto:compliance@sb1markets.com). SB1M shall communicate with clients in clear and precise language.

The secretary of the complaint unit shall register the complaint in a dedicated complaints register. The secretary of the complaint unit must without undue delay send a written confirmation to the client acknowledging receipt of the complaint. The confirmation shall at least include information about the expected processing time and that the client will receive a written response to the complaint.

Internal information and documentation relevant to the complaint shall be collected as quickly as possible before a comprehensive assessment is made. In this context, SB1M shall identify, document and mitigate any actual or potential conflicts of interest. The client shall be informed that records of complaint shall be retained for a minimum of five years. This period may be extended where deemed necessary or appropriate.

If the processing time exceeds the expected duration, the client shall be informed of the reason and when the matter is expected to be concluded. SB1M must ensure that all complaints are handled appropriately and as promptly as possible.

The complaint will be analysed to identify any systematic or fundamental problems within SB1M. If the complaint does not provide sufficient grounds for proper handling, this shall be communicated to the client without undue delay.

The client shall receive written notification of the outcome of the complaint. If the complaint is not in full favour of the client, written grounds should be provided to support SB1M’s decision. The client shall also be informed of the right to have the case reviewed by the Norwegian Securities Dealers Association’s Council of Ethics or the Norwegian Financial Services Complaints Board (FinKN). For

complaints regarding SB1Ms services in Sweden, clients must be informed that such cases shall be directed to The National Board for Consumer Disputes (ARN).

SB1M is required to annually report all complaints received to the Norwegian Financial Supervisory Authority. The report includes information regarding the number of complaints received and the outcome of these, as well as the number of complaints that have been escalated to a complaints appeal body.