MAGESKA
CAPITAL

COMPLAINT PROCESSING AND DISPUTE RESOLUTION POLICY

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COMPLAINT PROCESSING AND DISPUTE RESOLUTION POLICY

Nature of Complaints

A **complaint** means any statement, written or verbal, of a client or any person acting on behalf of a client, alleging a grievance involving the activities of the Mageska Capital Inc. ("**Mageska**") or any of its employees or representatives. This includes, but is not limited to, concerns related to:

- The solicitation, recommendation, or execution of transactions.
- The management or disposition of client funds or securities.
- Any product or service provided by Mageska.
- The conduct of an employee or representative.
- Mageska's policies, procedures, or communications.

All complaints, whether written or verbal, will be immediately forwarded to the **Chief Compliance Officer (CCO)**.

If an employee believes that a client may have a complaint, even if not formally expressed, the matter will also be referred to the CCO. Employees will refrain from commenting or offering advice once the matter has been referred.

The CCO will maintain a **Complaints Log**, recording the date, client name, nature of the complaint, actions taken, and resolution status. This log will be reviewed as part of each compliance audit.

Complaint Handling Procedures

1. General Principles

Mageska is committed to handling all complaints promptly, fairly, and in a transparent manner, in accordance with **National Instrument 31-103 (NI 31-103) – Registration requirements, Exemptions and Ongoing Registrant Obligations** and, where applicable, the **Securities Act (Québec)**.

All complaints will be:

- Acknowledged in writing within **ten (10) business days** of receipt.
- Investigated in good faith and documented in full.
- Addressed with a written final response **within sixty (60) calendar days** of receipt.

The CCO is responsible for reviewing and investigating complaints, determining their validity, and recommending corrective actions if necessary.

2. Procedure for Addressing Complaints

a. Informal Resolution

Some verbal complaints may be resolved informally within **twenty (20) business days**, often through direct communication with the client. If the client accepts the explanation or resolution, the complaint will be considered closed.

If not, or if the complaint is not resolved within that period, it will be documented and escalated as a formal written complaint.

b. Written or Formal Complaints

Upon receiving a written complaint, or when a verbal complaint becomes formalized, Mageska will:

1. Send a written acknowledgment within **ten (10) business days**, confirming receipt and describing the review process.
2. Conduct an impartial investigation led by the CCO.
3. Provide a written final decision within **sixty (60) calendar days** from initial receipt, stating whether the complaint is:
   - Dismissed, including the reasons.
   - Upheld, including the planned action.
   - Requiring additional investigation with estimated timeline (up to thirty (30) days)

c. Review and Oversight

All complaints will be reviewed by the **Ultimate Designated Person (UDP)**. If the UDP is the subject of the complaint, it will be referred to an independent external reviewer. The UDP and CCO may also consult external legal counsel if necessary.

d. Client Communication

The client will receive clear communication throughout the process, including acknowledgment, investigation updates, and the final written decision. All correspondence will include information about external dispute resolution options (OBSI or AMF, as applicable).

Recordkeeping and Analysis

Mageska will maintain a **Complaints Log** that includes:

- The complaint identification number.
- The date received.
- The client's name and representative (if applicable).

- A summary of the complaint.
- The responsible employee.
- The actions taken and date of resolution.

All complaint records and correspondence will be retained for **seven (7) years** from the date of receipt, in a secure and confidential manner.

The CCO will conduct an annual review of all complaints to identify trends, systemic issues, or areas for staff training and policy improvement.

Client Complaints in Québec

For clients residing in Québec, the Mageska complies with sections 168.1.1 to 168.1.8 of the *Québec Securities Act (QSA)* and the Autorité des marchés financiers (AMF)'s Complaint Processing and Dispute Resolution Regulation.

Mageska undertakes to:

- Provide equitable and transparent treatment of all complaints.
- Maintain a Complaints Log as prescribed.
- Make available a summary of this Complaints Policy to clients, indicating:
  - What constitutes a complaint.
  - The requirement to record each complaint.
  - The process and rights of the client.

AMF Reporting

Mageska will file **an annual report** with the Autorité des marchés financiers (AMF) through the **Complaint Reporting System (CRS)**, even if no complaints were received:

- Between March 1st and May 1st for data between January 1st and December 31st of the previous year.

Mageska shall inform each complainant, in writing and without delay, that they may request that Mageska forward their complaint file to the AMF if they are dissatisfied with the process or outcome. Upon request, Mageska will promptly send the complete complaint file to the AMF.

The AMF may, if appropriate, offer mediation services pursuant to section 168.1.5 of the QSA.

For more information on AMF mediation services: 1-877-525-0337 or www.lautorite.qc.ca.

Client Complaints Outside Québec (OBSI)

Mageska is a participating member of the **Ombudsman for Banking Services and Investments (OBSI)**, an independent service that provides free and impartial dispute resolution for clients outside Québec.

A client may contact OBSI if:

- Mageska has not provided a written final decision within **90 business days** of receiving the complaint, or
- The client is not satisfied with the Mageska's decision and requests OBSI's review **within 180 days** of receiving that decision.

OBSI Contact:
Email: ombudsman@obsi.ca
Telephone: 1-888-451-4519 or 416-287-2877 (Toronto)
Website: www.obsi.ca

OBSI can recommend compensation of up to **$350,000**.

Mageska will fully cooperate with OBSI and will cover all associated costs. Clients retain the right to pursue other dispute resolution services or legal remedies at their own expense.

Continuous Improvement

Mageska views each complaint as an opportunity to enhance its practices and strengthen client trust.

Accordingly, Mageska will:

- Train employees annually on complaint handling and escalation protocols.
- Analyze complaint trends for process improvement.
- Report significant findings to the CCO and UDP.