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SVX.US COMPLAINTS POLICY AND PROCEDURES

GENERAL

A complaint is any statement by a customer, prospective customer or any person acting on behalf of the customer (the “Complainant”), received in writing, orally or electronically, alleging a grievance involving the activities of SVX.US or a person associated with SVX.US in connection with the solicitation or execution of any transaction or the disposition of securities or funds of that customer (a “Complaint”). A complaint may also include expressions of dissatisfaction with services provided by SVX.US or its associated persons.

SVX.US will document and reasonably respond to each Complaint made to SVX.US.

Complaints can relate to any of the following matters:

- a trading or advising activity;
- a breach of Client confidentiality;
- theft, fraud, misappropriation or forgery;
- misrepresentation;
- an undisclosed or prohibited conflict of interest; or
- personal financial dealings with a Client.

The Chief Compliance Officer may determine that a Complaint relating to matters other than those listed above are of a sufficiently serious nature to be responded to in the manner described below.

RESPONSIBILITY FOR HANDLING COMPLAINTS

Any written communications that may be Complaints should be made to info@svx.us. Any employee, officer or director of SVX.US may be the first person to receive a communication from a Complainant. The Designated Principal of SVX.US has the responsibility to determine whether or not there is a valid complaint, and then to deal with and resolve Complaints. The Designated Principal will work with the Chief Compliance Officer or other members of senior management of SVX.US or Bequia Securities, to investigate the facts and circumstances. and addressed to the Chief Compliance Officer. If the Complaint is regarding the Chief Compliance Officer, the Complaint will be handled by the Designated Principal or counsel and should be addressed to them.

COMPLAINT HANDLING PROCESS

1. **Complaint Acknowledgement Letter** – SVX.US will send an acknowledgement letter to a Complainant, which will include the following:
 - The name, title and contact information of the Designated Principal handling the complaint;
 - A statement indicating that the Complainant should contact the Designated Principal to enquire about the status of the Complaint;
 - An explanation of the firm’s internal complaint handling process, including the role of the Designated Principal and Chief Compliance Officer; and
 - A request for any additional information reasonably required to investigate the complaint.

If a Complaint is made verbally, and is not clearly expressed, the Designated Principal or Chief Compliance Officer may request that the Complainant put the Complaint in writing in order to try to resolve confusion about the nature of the issue.

2. **Complaint Substantive Response Letter** – The Designated Principal, Chief Compliance Officer or counsel will send a substantive response letter to the Complainant to inform Complainant of the outcome and to propose a plan of remediation or settlement if applicable. If the firm requires more time to address a complaint it will write to the Complainant to explain the delay and to provide an estimated time of completion. The substantive response letter will contain the following:
 - A summary of the complaint;
 - The results of the investigation;
 - The firm’s final decision on the Complaint, including an explanation; and
 - A statement describing to the client the options available if the client is not satisfied with the firm’s response, including:
 - Arbitration; and/or
 - Submitting a regulatory complaint to FINRA for an assessment of whether disciplinary action is warranted;
3. **Investigation and Decision** – The nature of the Complaint will determine the course, coverage and extent of the investigation. The Designated Principal or Chief Compliance Officer will review the Complaint, SVX.US employee statements and all supporting documentation. Any settlements must be approved by the Chief Compliance Officer and Designated Principal of the SVX.US and will require the Complainant to sign a release prior to payment.

SVX.US employees may not under any circumstances enter private settlements with Complainants.



If Complainant agrees, then the file will be closed and any additional reporting on the Company's Form BD or the named Representative's Form U4 will be completed.

If Complainant disagrees with the Company's assessment, remediation plan or settlement offer, if applicable, the Designated Principal and/or counsel will meet with SVX.US senior management to determine next steps. The Company may put forth another solution or inform Complainant that they have closed the matter at that time.

DUTY TO ASSIST IN CLIENT COMPLAINT RESOLUTION

Registered representatives are required to co-operate with the SVX.US if they were employed or acted as an agent, when moving to a different firm after events or activities resulted in a Complaint. Firms are required to co-operate with each other if events relating to a Complaint took place at more than one firm or if the registered representative is an employee or agent of another firm.

SETTLEMENT AGREEMENTS

A release entered into between a firm and a client may not impose confidentiality or similar restrictions aimed at preventing a client from initiating a complaint to the securities regulatory authorities, self-regulatory organizations or other enforcement authorities, or continuing with any pending complaint in progress, or participating in any further proceeding by such authorities.

COMPLAINT RECORD RETENTION

The following information will be kept for each complaint:

- the complainant's name;
- the date of the complaint;
- the nature of the complaint;
- the name of the individual who is the subject of the complaint;
- the materials reviewed in the investigation;
- the name, title and date individuals were interviewed for the investigation; and
- the date and conclusions of the decision rendered in connection with the complaint.