

APPEAL CONSIDERATION PROCEDURE

1. INTRODUCTION

This procedure has been established in accordance with the Norwegian Securities Trading Act and the Financial Supervisory Authority of Norway's Circular 12/2014 – Guidelines for Appeals in Banking, Finance, Insurance and Investment Firms ("the Directive"). The appeal consideration procedure of SB1 Markets ("SB1M") is publicly available.

2. PURPOSE

The purpose of this procedure is to ensure adequate client protection. Furthermore, it aligns with the European Union ("EU") guidelines concerning the handling of client appeals by investment firms.

Upon request, SB1M shall provide the complainant with written information regarding the appeal procedure, including guidance on how to formulate a complaint. The firm's appeal procedure is publicly accessible. Should the complainant require assistance, enquiries may be directed to SB1Ms Compliance department via email: compliance@sb1markets.com. SB1M shall communicate with clients in a clear and precise manner.

3. PROCEDURE

If a client wishes to lodge a complaint regarding services provided by SB1M, the recipient of the complaint shall instruct the complainant to submit a written statement. The complaint must be forwarded to SB1M's complaints unit without undue delay.

Complaints may be submitted via email to complaints@sb1markets.com or by post to SB1M. Please mark the envelope with "Appeal".

The secretary of the complaint's unit shall register the complaint in the Complaints Register and confirm receipt in writing to the client. The confirmation shall include information regarding the expected processing time and the client's right to have the complaint reviewed by the complaints board. SB1M shall respond to the complainant without unnecessary delay.

Prior to the assessment of the complaint, SB1M will collect relevant information and documents to process the complaint. As well as identify and mitigate potential conflicts of interests. In accordance with the Norwegian Securities Trading Act, the client shall be informed of the firm's duty of custody, whereby complaints are typically retained for five years before deletion. SB1M reserves the right to extend the retention period if deemed necessary or appropriate.

If the processing time exceeds the expected duration, the client shall be informed of the reason and provided with an updated timeline for resolution. SB1M ensures that all complaints are handled appropriately and as efficiently as possible.

Each complaint shall be analysed to identify any recurring or systemic issues. If the complaint lacks sufficient detail to enable proper handling, this shall be communicated to the client promptly.

The client shall receive written notification of the outcome of the complaint. If the appeal is unsuccessful, a written explanation shall be provided. The client shall also be informed of the right to escalate the matter to the Norwegian Securities Dealers Association's Council of Ethics or The National Board for Consumer Disputes (ARN) in Sweden.