CLIENT COMPLAINTS POLICY AND PROCEDURE

Earn
Online Broker

October 2025

Top Markets Solutions Ltd
Operating under the trade name Earn
11, Olympias Street, Flat 4, 1070 Agios Antonios, Nicosia, Cyprus
www.earn.eu | www.earn.broker

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1. General

1.1. Top Markets Solutions Ltd ("the Company"), operating under the trade name Earn, maintains effective and transparent procedures for the reasonable and prompt handling of complaints received from clients and keeps a record of each complaint along with the measures taken for its resolution.

2. Definition of a Dispute

A dispute is a disagreement between two or more parties, and it can arise over different issues.

2.1. In cases where the Client believes that the Company's actions or failures to act resulted in a violation of any provision of the Operative Agreement, the Client will communicate their concerns to the Company, and the Company will undertake to fairly assess such concerns and provide a substantiated response.

To initiate a dispute, the Client will file with the Company a ticket from their Client Login page, under the topic that most closely relates to the nature of the Client's situation. The Client accepts that the Company will not be able to respond to disputes initiated by the Client by use of any third-party resources (such as web-forums, boards etc.), social media, by phone or fax, or via third parties that have not been properly authorised by the Client for legal representation.

The Company will aim to resolve all disputes according to the Operative Agreement, and in case of situations not specifically covered by the Operative Agreement, according to the commonly accepted market practices, applicable laws and regulations, and principles of general ethics encompassing truthfulness, honesty, integrity, respect for the Client, fairness and justice.

Irrespective of the above, the Company will not accept any responsibility for any failures of the Client to act in observance of their own interests, and for all and any financial losses or moral damages resulting from the above, including, inter alia and foregone profits.

2.2. In cases when the Company erroneously executed a Stop Out in the Client's account, the Company will be obliged to restore all of the Client's positions resulting from such Stop Out. The Client accepts, however, that the Company will not be liable for any losses or foregone profits resulting from subsequent unwinding of such positions at a price different from the price at which they could have been closed should the erroneous Stop Out not have happened. The Client also accepts that in resolving disputes arising from erroneous Stop Outs, the Company will have the right to execute Stop Loss or Take Profit orders in the same chronological sequence, in which they would have been triggered should the erroneous Stop Out not have happened.

In cases when, due to the Company's omission, a Client's Stop Loss or Take Profit order have not been executed despite all relevant conditions having been satisfied for the execution of such an order, the Company will close the position, once the omission has been discovered,

either by the Company on its own, or during the investigation into the Client's dispute, at the current market price and will adjust the Client's balance for the difference in the position's value between the price at which the position should have been closed, and the actual closing price.

3. Definition of a Complainant and a Complaint

Clarification of terms: A *dispute* represents any disagreement or issue arising between the Client and the Company, while a *complaint* constitutes a formal expression of dissatisfaction submitted in accordance with this Policy. A complaint may arise from a dispute that the Client considers unresolved or unfairly handled by the Company. Accordingly, all disputes that remain unresolved following communication with Customer Support or Back Office may be escalated as complaints through the channels listed below.

3.1. A Complainant is any person, natural or legal, who has has interacted with the Company in relation to the provision of its investment or ancillary services, including existing or potential clients, or a duly authorised representative of such persons acting under written authorisation..

3.2. A complaint is an expression of dissatisfaction or concern by the Client regarding the provision of investment and/or ancillary services provided by the Company, which has become a subject of the dispute between the Client and the Company, whereas the Client believes that the dispute initiated by him or her has not been resolved by the Company fairly.

3.3. A complaint should necessarily refer to specific circumstances and/or events that evidenced the Company's presumed failure to deliver on its obligations as per the Operative Agreement or implied cite specific violations, breaches or failures of the Company to act according to the Operative Agreement that the Client thinks have taken place. A complaint should also include the course of remedial actions requested by the Client.

Before filing a complaint, clients are advised to try to solve any issues they may encounter when using the Company's services by first contacting the Company at support@earn.eu. If the issue is not solved by the Company to the client's satisfaction in a prompt manner, then the client may refer to the complaints handling procedure instead.

It is to be notified in writing by the client to the Company Back office/ Customer Support department by one of the following means of communication:

a) Client Login Page
b) Company website form
c) E-mail address: complaints@earn.eu
d) Fax + 357 22 31 53 25
e) Send mail to the Company's business address: 5 Esperidon, 4th floor, 2001, Nicosia, Cyprus.

Clients are hereby informed, and agree, that Complaints submitted using any other different means of communications may not be accepted and addressed by the Company within the terms and timeframes defined by the present policy and will not be regarded as official and properly lodged complaints.

While filing a complaint, the following details must be included:

a) The client's name and surname;
b) The client's trading account number;
c) The date and time that the issue arose;
d) A detailed description of the issue;
e) Suggested remedial actions to be taken by the Company;
f) Other relevant information, such as, attachments supporting the issue;
g) The disputed amount in euros (no decimals);
h) The date the complaint was submitted;
i) Any previous correspondence reference or ticket number.

3.4. Summary of Complaints Handling Procedure:

The Company will acknowledge the receipt of all clients' complaints as soon as possible and at latest within 5 days of receiving the complaint and inform clients of their unique reference number, which should be used in all future communications with the Company, the CySEC and/or the Financial Ombudsman regarding the complaint.

The Company is obliged to provide all its clients with an answer or resolution to any complaints/ queries/ requests within two months, according to paragraph 13(9) of the Directive. The Company aims to provide a final response within two weeks from receipt of the complaint, and in all cases within two months from the date of submission, as required under Article 26 of Commission Delegated Regulation (EU) 2017/565.

If the Company is unable to provide the client with a final response within the above mentioned time frame, the Company will inform the Client explaining the reason for the delay and advise the client when a final response shall be expected, at the very latest within three months.

If a client's complaint is not resolved to their satisfaction, the client may contact the Cyprus Securities and Exchange Commission at https://www.cysec.gov.cy/en-GB/investor-protection/how-to-complain/ref/, or have recourse to any other available means, such as, ADR or the competent Courts or the Financial Ombudsman at http://www.financialombudsman.gov.cy.

Please note that the Cyprus Securities and Exchange Commission (CySEC) does not have restitution powers and cannot award compensation. Clients who remain dissatisfied may refer their case to the Financial Ombudsman within four (4) months of receiving the Company's final response.

4. Reporting and Record Keeping

4.1. All decisions related to clients` complaints shall be communicated to clients. The complaints processing should be fully documented and added to each client file to which it relates. Records of all lodged and resolved complaints should be maintained for a minimum period

of five (5) years. The Board of Directors of the Company shall be informed in regard to all important complaints received, as well as the measures taken for resolving them.

The following details must be documented and kept as records by the Complaints Handling Officer:

a) The Unique Reference Number of the Complaint which is allocated by the Company to it as soon as the complaint is received;
b) The ID details of the client who filed the complaint;
c) The service to which the complaint refers;
d) The details of the employee that undertook to provide the service to the client;
e) The department or organisational unit to which the employee relates;
f) The date on which the complaint was received;
g) The content of the complaint in summary;
h) The extent in financial terms of the potential loss that the client claims he or she has suffered or as it is derived from the content of the complaint;
i) The date and in summary, the content of the reply that the Company gave to the said complaint;

5. Submission of information to the CySEC

5.1. Every month the Company provides to CySEC information regarding the complaints it receives and how these are being handled.

ANNEX A. CLIENT COMPLAINT FORM

Dear Client,
If you wish to lodge a complaint against Top Markets Solutions Ltd, please complete this form, sign it, and submit it in **PDF format only** to **complaints@earn.eu**.

Date: ___/___/_____

Full name*:	
ID/Passport No/Registration No*:	
Account No*:	
Contact detail including e-mail*:	
Complaint cause*:	
Disputed amount (EUR, no decimals):	
Financial instrument:	
The date of the last correspondence with the Company Customer Support:	
A detailed summary of the events leading up to a complaint*: (Please attach any supporting documents)	

Expected resolutions/outcomes to rectify the situation*:	
Are you submitting this complaint on behalf of another person? (If yes, please attach written authorization or power of attorney.)	☐ Yes ☐ No

Signature:
I, [Name], hereby acknowledge that I have read and understood the content of the Client Complaints Policy and Procedure provided by the Company along with this form.

This form accompanies the Client Complaints Policy and Procedure (October 2025).