ARS Capital, LLC

COMPLAINTS HANDLING POLICY AND PROCEDURES

1. OBJECTIVE OF THE POLICY

ARS Management seeks to maintain and enhance our reputation of providing you with high quality services. We value complaints as they assist us to improve our products, services and customer service.

ARS Management is committed to being responsive to the needs and concerns of our customers or potential customers and to resolving your complaint as quickly as possible.

This policy has been designed to provide guidance to both our customers and staff on the manner in which **ARS Management** receives and manages your complaint. We are committed to being consistent, fair and impartial when handling your complaint.

The objective of this policy is to ensure:

- **You are aware of our complaint lodgment and handling processes,**
- **Both you and our staff understand our complaints handling process,**
- **Your complaint is investigated impartially with a balanced view of all information or evidence,**
- **We take reasonable steps to actively protect your personal information,**
- **Your complaint is considered on its merits, taking into account individual circumstances and needs.**

2. DEFINITION OF A COMPLAINT

In this policy a complaint means an expression of dissatisfaction by a customer relating to trade service provided by us.

3. HOW A COMPLAINT CAN BE MADE

If you are dissatisfied with a trade service provided by us, you should first speak directly with the staff member(s) you have been dealing with. If you are uncomfortable with this or consider the relevant staff member is unable to address your concerns, you can lodge a complaint with us in one of the following ways:

- **By phone: 956.648.2089**
- **By mail: 6004 Thursby Ave. Dallas, TX 75252**
- **By email: rob@arscap.com**

If we receive your complaint verbally and we consider it appropriate, we may ask you to put your complaint in writing.

4. INFORMATION WE MAY REQUIRE

When we are investigating your complaint, we will be relying on information provided by you and information we may already be holding. We may need to contact you to clarify details or request additional information where necessary. To help us investigate your complaint quickly and efficiently we will ask you for the following information:

- **Your name and contact details,**
- **The name of the trade desk representative you have been working with,**
- **The nature of the complaint,**
- **Details of any steps you have already taken to resolve the compliant,**
- **Details of conversations you may have had with us that may be relevant to your complaint,**
- **Copies of any documentation which supports your complaint.**

5. ASSISTANCE MAKING A COMPLAINT

The person receiving or managing your complaint should provide you with any assistance you may need to make your complaint. However, if you consider you need further assistance please contact:

Jesse Wilkinson • jw@arscap.com • 682.556.7397

6. RECORDING COMPLAINTS

When taking a complaint, we will record your name and contact details. We will also record all details of your complaint including the facts and the cause/s of your complaint, the outcome and any actions taken following the investigation of your complaint. We will also record all dates and times relating to actions taken to resolve the complaint and communications between us.

As part of our on-going improvement plan, complaints will be monitored for any identifying trends by management and rectification/remedial action taken to mitigate any identified issues.

If you lodge a complaint, we will record your personal information solely for the purposes of addressing your complaint. Your personal details will actively be protected from disclosure, unless you expressly consent to its disclosure. Where a third-party travel supplier such as a tour operator, was involved in your travel services, we may be required to speak with them to fully investigate your complaint.

7. FEEDBACK TO CUSTOMERS

ARS Management is committed to resolving your issues at the first point of contact; however, this will not be possible in all circumstances, in which case a more formal complaints process will be followed.

We will acknowledge receipt of your complaint within three (3) business days. Once your complaint has been received, we will undertake an initial review of your complaint.

There may be circumstances during the initial review or investigation of your complaint where we may need to clarify certain aspects of your complaint or request additional documentation from you. In such circumstances we will explain

7. FEEDBACK TO CUSTOMERS (CONTINUED)

the purpose of seeking clarification or additional documentation and provide you with feedback on the status of your complaint at that time.

We are committed to resolving your complaint within 10 business days of you lodging your complaint, however, this may not always be possible on every occasion. Where we have been unable to resolve your complaint within 10 business days, we will inform you of the reason for the delay and specify a date when we will be able to finalize your complaint.

During the initial review or investigation stage we may need to seek further clarification or documentation from you to assist us in resolving your complaint.

If we have sought clarification or additional documentation from you and we are waiting on you to provide this information, we may not be able to meet our 10-business-day finalization commitment. In such circumstances upon receipt of your clarification or additional documentation we will indicate to you when we expect to be able to finalize your complaint.

Once we have finalized your complaint, we will advise you of our findings and any action we have taken. We will do this in writing, unless it has been mutually agreed that we can provide it to you verbally.

You have the right to make enquiries about the current status of your complaint at any time by contacting us.

8. OUR SIX POINT COMPLAINT PROCESS

- **We acknowledge:**
  Within three business days of receiving your complaint we will acknowledge receipt of your complaint.

- **We review:**
  We undertake an initial review of your complaint and determine what if any additional information or documentation may be required to complete an investigation. We may need to contact you to clarify details or request additional information where necessary.

- **We investigate:**
  Within 10 business days of receiving your compliant we will investigate your complaint objectively and impartially, by considering the information you have provided us, our actions in relation to your dealings with us and any other information which may be available, that could assist us in investigating your complaint.

- **We respond:**
  Following our investigation, we will notify you of our findings and any actions we may have taken regarding your complaint.

- **We take action:**
  Where appropriate we amend our business practices or policies.

- **We record**
  We will record your complaint for continuous improvement process and monitoring through regular review, your personal information will be recorded in accordance with relevant privacy legislation.

9. WHEN YOU COMPLAIN ABOUT ONE OF OUR EMPLOYEES

If you complain about a member of our staff, we will treat your complaint confidentially, impartially and equally (giving equal treatment to all people). We will investigate your complaint thoroughly by finding out the relevant facts, speaking with the relevant people and verifying explanations where possible.

We will also treat our staff member objectively by:

- **informing them of any complaint about their performance,**
- **Providing them with an opportunity to explain the circumstances,**
- **Providing them with appropriate support,**
- **Updating them on the complaint investigation and the result.**

10. COMPLAINTS UNDER INVESTIGATION BY A REGULATOR OR LAW ENFORCEMENT AGENCY

If your complaint is currently being investigated by a relevant federal, state or territory consumer protection regulator or law enforcement agency we may cease to take further action in relation to your complaint pending finalization of their investigation.

We will assist any agency with their investigations.

11. OUR COMPLAINT ESCALATION PROCESS

Where possible, we will attempt to resolve your complaint at the first point of contact. If we are unable to resolve your complaint at the first point of contact, we will undertake an investigation of your complaint and provide you with our findings.

If you are not satisfied with how your complaint has been handled, or the resolution provided by us, you can request us to escalate your complaint to our internal customer complaint department.

Our internal customer complaint department's approach will be to attempt to resolve your complaint through consultation, by working with both you and us, to determine the relevant facts and establish a common ground. We will remain open and impartial throughout the consultative process and consider your complaint and our actions, in attempting to resolve your complaint on their merits.

If you are not satisfied with the outcome of the internal customer complaint department consultation process, we will escalate your complaint onto the Senior Management Review Team.

The Senior Management Review Team will investigate your complaint, our actions regarding your complaint and take reasonable steps to resolve the complaint, by reaching a fair view.

11. OUR COMPLAINT ESCALATION PROCESS (CONTINUED)

A diagram of our Complaints Escalation Tiers (figure 1) and the Hydra Complaints Flowchart (figure 2) can be found below.

Escalation Process

TIER 1 First Contact Resolution

- **Our trade desk representatives are empowered to resolve complaints, wherever possible, at first contact.**

TIER 2 Investigation

- **If you are not satisfied with our first contact response, you can request us to escalate your complaint. We will then investigate your complaint and consider all the relevant circumstances and information surrounding the complaint and inform you of our findings.**

TIER 3 Internal Review

- **If you indicate you are not satisfied with the outcome of the investigation of your trade desk representative, your complaint will be escalated to an internal customer complaint review board.**

TIER 4 Senior Management Review

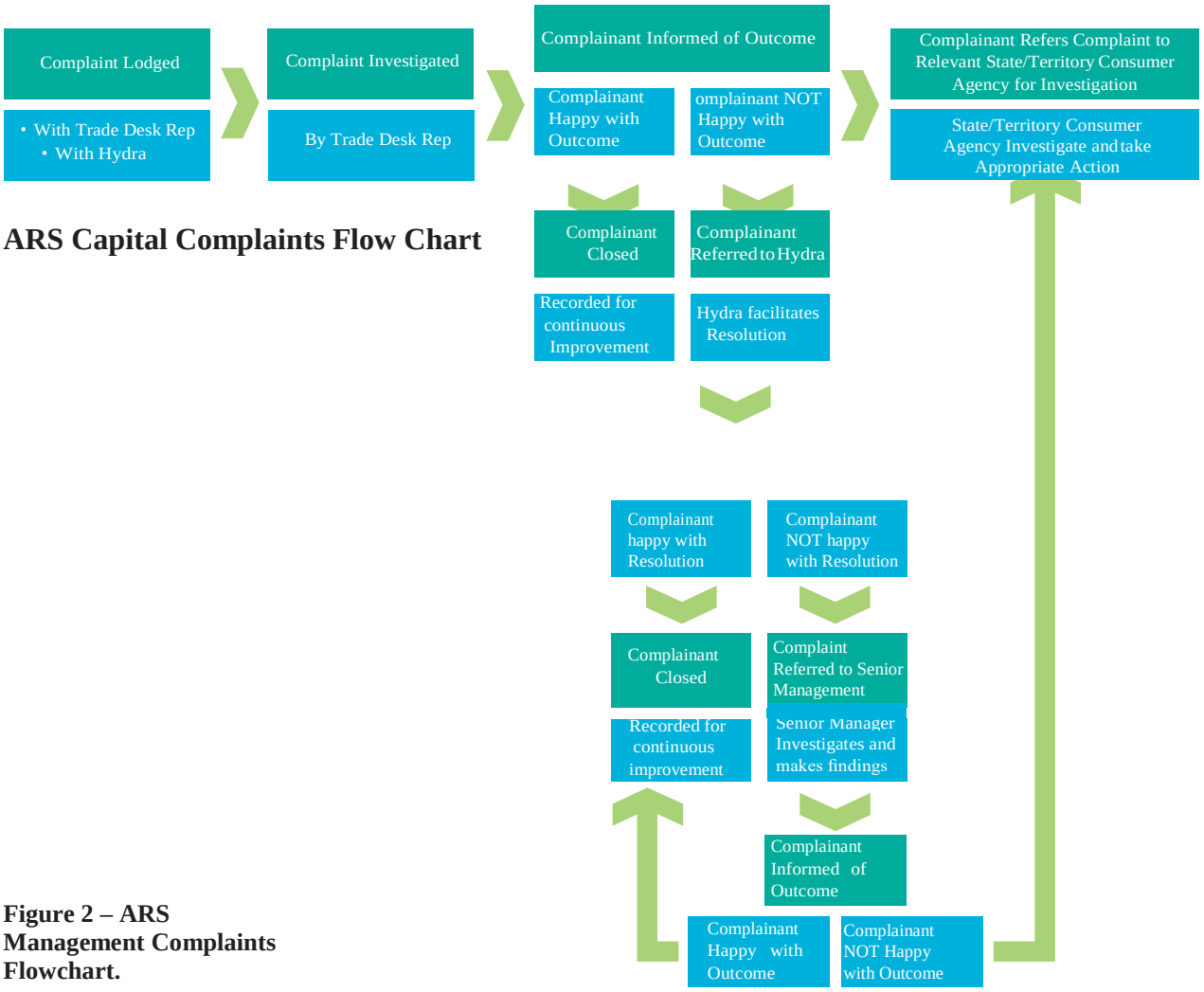
- **If you are not satisfied with Hydras' initial resolution, your complaint will be referred to the Hydra Senior Management Team for reevaluation.**

TIER 5 Consumer Protection Agency

- **If you are not satisfied with the outcome of the Senior Management Team review, you can refer your complaint to your relevant state or territory consumer protection agency.**
- **You have the right to make a complaint direct to your respective state or territory consumer affairs agency at any time throughout the complaint handling process.**

Figure 1 – Our Complaints Escalation Tiers (Hierarchy of customer complaint review processes)

11. OUR COMPLAINT ESCALATION PROCESS (CONTINUED)



ARS Capital Complaints Flow Chart

Figure 2 – ARS Management Complaints Flowchart.

12. YOUR RIGHTS UNDER CONSUMER LAW

You reserve the right to refer your complaint to your relevant federal, state or territory consumer protection agency at any time.