



# COMPLAINT HANDLING AND PROCESSING POLICY

2023

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## 1. COMPLAINT HANDLING AND PROCESSING POLICY

**Complaint** – is an expression of discontent directed or made to the Company, Company's products or services, employees or the management where reaction or solution is particularly or inevitably expected or lawfully required.

It is the duty of every employee who receives a complaint to refer the complaint to the Customer Support Department in the first instance. If the complainant receives a response from the Customer Support Department but deems that the complaint needs to be raised further, the complainant may either ask the Customer Support Department to escalate it to the Compliance Department or directly contact the Compliance Department, which will independently and impartially investigate it.

The original statement of the complaint must include:

- The complainant's name and surname;
- The complainant's trading account number;
- The affected transaction numbers, if applicable;
- The date and time that the issue arose;
- The date and time of complaint's receipt;
- Issues raised by the complainant and the solution or remedy they expect to receive;
- Other relevant information regarding complaint.

## 2. COMPLAINT HANDLING PROCEDURE

Once a complaint has been received, the following steps must be taken:

### 2.1. Acceptance of complaint

For every complaint the Company will provide an affirmation of receipt. Affirmation of complaint's receipt will be provided via the most suitable means for communicating (e.g. email, letter) with the complainant. The Company will acknowledge the complaint and will send an initial response to the complainant within 48 hours.

### 2.2. Initial assessment and addressing of complaints

- a. After accepting receipt of the complaint, the Company will determine whether the problem raised in the complaint is within the Company's expertise to solve. The Company will also evaluate the solution complainant has proposed in his complaint and, if more than one problem need to be solved, consider whether each problem should be dealt separately.

At this stage it will be decided by the Company how issue raised by complaint should be resolved, and therefore evaluate:

- Complexity and urgency of the complaint;
  - Impact on complainant by raised issue;
  - The risks associated with the raised issue and possible future risks in case resolution of the issue is delayed or the positive result cannot be reached;
  - If third-party participation is required to reach solution.
- b. Once the initial assessment has been completed, the Company will continue to determine how the presented complaint should be managed. In this case there are possible following complaint management options:
    - The Company will provide complainant with information or explanation related to underlined problem;
    - The Company will collect and evaluate information on the product, service, individual or other matters related to complaint;

- The Company will examine the issues raised in the complaint.

The Company will keep the complainant updated about the improvement of the situation, especially if there are any complications and delays. Each situation will be evaluated separately and the best solution for resolving the situation, if at all possible, will be introduced according to all statutory requirements.

**2.3. Upon making a decision on the potential solution, the Company will reach out to the complainant and inform them on the following:**

- The possible solution for the issues raised in the complaint and measure which has been taken;
- Motivation for the suggested possible solution;
- Other possible options for examination that may be open to the complainant.

**2.4. The final step is to close the complaint and retain records of the complaint**

For each complaint the Company will retain following information:

- The complainant's name and surname;
- The complainant's trading account number;
- The affected transaction numbers, if applicable;
- The date and time that the issue arose;
- Acknowledgement of the receipt of the complaint;
- An overview of the complaint and all materials associated with complaint;
- Information about involved employees;
- Detailed information on the internal and external interactions;
- Course of measure which has been taken;
- Reached solution;
- Complaint closure date.

### **3. REMEDIES**

The Company lay down the following possible remedies as a result of infringed rights:

- Apology;

- Reimbursements and refunds;
- Disciplinary action against the Company's employees;
- Technical support;
- Further details or information;
- Reward;
- Other necessary support.