



# **CLIENTS COMPLAINTS HANDLING POLICY**

This Document on Clients Complaints Handling Policy and Regulatory Protections is effective from 24 July 2020 and shall remain effective until a more recent version is released. Finalto (BVI) Limited ("Finalto BVI") reserves the right to amend or supplement this Document at any time. This Document does not replace our Terms and Conditions The "Agreement") which we ask that you read carefully before you enter into any trading. The prevailing version of this Document is always available on our website.

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## 1. SCOPE AND INTRODUCTION

Finalto (BVI) Limited ("Finalto BVI" or the "Company" or "we") is an authorized and regulated by the B.V.I Financial Services Commission ("B.V.I. FSC") under the Securities and Investment Business Act, 2010, license number SIBA/L/14/1067. As such, the Company established the Clients Complaints Handling Policy (the "Policy") to develop the framework which will enable you to exercise your rights.

The purpose of this document is to inform you of the procedure which will be followed in order to provide a resolution for the complaint which you have submitted.

The Company has adopted the following Clients Complaints Handling Policy specifically designed for Clients (the "Policy") in order to ensure its corporate culture for Treating Customers Fairly ("TCF"). This Policy is designed to promote reasonable and prompt handling of complaints, disputes, or grievances received from Clients, referred to as the "Client", the "Complainant" or "You").

We aim to provide a high level of service to all of our Clients at all times to build a strong and long-lasting service relationship with you. We acknowledge that from time to time things can go wrong or there can be misunderstandings. Therefore, we are centrally committed to dealing with queries and complaints, recognizing that a client's feedback and/ or expression of dissatisfaction is an opportunity for us to improve by enhancing our products and level of service.

Accordingly, we established transparent procedures to implement reasonable, effective and prompt handling of Complaints; while maintaining records of each Complaint in line with B.V.I. FSC's legislative requirements.

**"Query"**- shall be any form of dissatisfaction with our provided services.

**"Trading Query"**- shall be any form of dissatisfaction with our services which relate to your trading account and platform activities.

**"Complaint"**-shall mean an expression of dissatisfaction by a Client regarding the provision of investment and/ or ancillary services provided to him/her by the Company.

## 2. QUERIES AND COMPLAINTS

**Query** – Usually resolved within 48 hours

If you are dissatisfied with the service provided by Markets.com, please contact our Customer Service as soon as possible by E-mail at support@markets.com, Live Chat , or via our Online Queries Form, which is always available on our website, for immediate and prompt assistance.

Our representatives are available to assist you through your concerns to reach to a fair conclusion.

**Trading Query** – Usually resolved within 48 hours

If you have a **trading query** relating for example to your trading account and the operation of this on our trading platform Markets. com or with respect to our Terms and Conditions, you can submit a trade enquiry by submitting the Online Trading Query Form, which is always available on our website. Please note that all trading enquiries must be logged with us as quickly as possible after the trading enquiry, need for clarification or issue have occurred.

A dedicated team of professionals is available to research and resolve your trading query the soonest – we are committed to responding the latest within 48 hours of receipt of your Trading Query. Once your trading query has been examined you will receive a full explanation of the circumstances and the outcome.

**Complaint** – Process can take up to 2 months to resolve

You are entitled to submit a complaint at any time in your trading experience with us, where you may feel that our service has not met your satisfaction. Where any trading or other query has not been addressed or when you wish to submit a **formal complaint** at the initial or a subsequent stage, you can do so by completing the Online Complaint Form, which is always available on our website.

Note that all the information included on the Online Complaint Form must be completed in order for our dedicated Quality Control Department to examine your complaint in an informed manner. We may request further information and/or supportive documentation during the review process. We ask for your valued cooperation in the review process of your complaint in order to complete our work and provide you with our feedback and response the soonest possible.

### 3. HANDLING YOUR COMPLAINTS

Upon receipt of the completed Online Complaint Form, which is always available on our website, the Quality Control Department will examine your claims and record the receipt of an official Complaint. Upon the recording of your complaint, it will be given a Unique Reference Number ("URN") which will be given a unique reference number which will also be communicated to our regulator, B.V.I. FSC.

The process that we envisage will be followed in dealing with your complaint is as follows:

- We will acknowledge receipt of your complaint within 5 days, providing you with the recorded URN which will be quoted in all communications directed to you from the Company regarding the Complaint, while informing you that the Complaint is being investigated;
- We will attempt to have your complaint resolved within a period not exceeding two (2) months from the submission date of your complaint.

The Quality Control Officer will investigate the claims and the content of the completed Online Complaint Form, which is always available on our website the evidence the Complainant has provided, and the evidence in our records. As part of our investigation we may share and receive information(including personal, financial and trading data)regarding a Client complaint with/from third parties (e.g. with the B.V.I. FSC, the Financial Ombudsman of Australia, our legal advisors or with another subsidiary company of the Markets.com group of companies) in line with our Privacy Policy.

Further clarifications and information relating to the Complaint may be requested from the Client within a time frame of two (2) months. Once a Complaint's investigation is completed, a Final Response shall be communicated to the Client with the investigation outcomes, clarifying explanations and any remedy measures the Company intends to take for the resolution of the complaint.

The Full and Final Response to a complaint may be either one of the below where the company:

- accepts the Complaint and considers the complaint as valid with legitimate grounds where the client was exposed to faulty or unduly actions. Accordingly, a settlement may be offered to the client in accordance to the Company's Policy to resolve complaints in amicable and good business terms;
- Offers settlement in the form of Ex-Gratia, where the company does not accept the claims raised in the Complaint. However, as a gesture of goodwill and in accordance to the Company's policy to resolve complaints in amicable and good business terms;
- Rejects the complaint as no valid grounds support the claims behind the complaint. The company should respond with a rejection clarifying the reasons behind the rejection.

Worth to note, should a Client fail to reply to any communication from the Company (including the Final Response) for a period of exceeding one (1) month, the Company will consider the Complaint closed.

If the Company is unable to resolve a Complaint within two (2) months, the Company will update the Client on the status of their Complaint while continuing to investigate the complaint until a Full response is reached. According to applicable regulatory obligations, the Company has an additional month to resolve a Complaint, in the event the Company was unable to resolve a Complaint within two (2) months, a Final Response should be issued within maximum three (3) months from the day of the Complaint was submitted.

Upon the receipt of our Final Response on your complaint you are not satisfied or in case no response is received within the 3 months' timeframe, you can refer your complaint to the B.V.I. FSC. For more information please visit <http://www.bvifsc.vg>.

### 4. DISCLOSURE AND UPDATE OF THE POLICY

This Policy shall be regularly reviewed and updated by the Quality Control Department in consultation with the Compliance Department and in line with applicable legislation updates.

### 5. RECORD KEEPING AND REPORTING

The Company, in line with the Regulatory and legislative requirements is required to keep updated records of all the received and registered with details of the investigations conducted, the final outcomes, settlement measures undertaken and all the communication with the Clients in line with our Privacy Policy.

The Quality Control Department shall maintain the appropriate records in this respect and the Compliance Department shall regularly monitor and review the Company's compliance with the applicable regulatory requirements for handling Client Complaints and the record keeping held by the Quality Control Department.