



Complaint Handling Policy and Procedures

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Purpose

The purpose of this Complaint Handling Policy and Procedures is to outline the procedure that will be implemented by the employees of Neotrades Capital Ltd (hereinafter “**the Company**”) in relation to addressing and resolving complaints of customers in a fast and effective manner.

Definitions

“**Complaint**” is defined as a statement, or an expression of dissatisfaction addressed to the Company by a client (natural or legal person) regarding the provision of investment and/or ancillary services provided by the Company to the client.

“**Complainant**” is defined as any person, natural or legal, who has read, agreed with, and accepted the Company’s Terms and Conditions, has opened a trading account with the Company, and has lodged a complaint.

You may submit your complaint in writing and address it to the **Complaints Function** of the Company who is authorized to handle and investigate complaints that may be submitted to them from its Clients.

You are encouraged to use the **Complaints Form** hereto attached as *Appendix A* and submit it electronically by email at complaints@neotrades.com.

Complaint Handling Procedure

The Company shall efficiently handle any complaint received by a Complainant. In the case that the complaint is against the Compliance Department, the complaint shall be handled by a member of the Senior Management.

Procedure to be followed for the received Complaints

The following procedure should be followed in the event the Company and/or any of its employees (regardless of the department) receive a complaint or grievance:

- a. It is the Company’s Policy not to accept any verbal complaints or grievances. In case any of the Company’s employees receive a verbal complaint or grievance shall take all the necessary actions so that the complaint or grievance is properly addressed to the **Complaints Function** of the Company who is authorized to handle and investigate all the complaints raised by its clientele. The said employee will inform the Complainant that all the complaints or grievances must be made in writing by completing the relevant **Complaint Form**, hereto attached as *Appendix A*, and submit it via email to complaints@neotrades.com.
- b. If the Complainant submits the **Complaint Form** to his/her Account Representative then the complaint or grievance, in the form that has been received, must be forwarded to complaints@neotrades.com within the same working day. Subsequently, a member of the Support Department will inform the Complainant that his/her complaint or grievance has been forwarded to complaints@neotrades.com

and that he/she will be informed accordingly by the relevant department regarding the status of his/her complaint.

- c. If the complaint was not received in the manner described in Paragraph “*Definitions*” (i.e. the complaint was received through internal channels of communication such as chat, client correspondence, or by a member of the Back Office Department or by an Account Representative or by any other employee of the Company) then the complaint, in the form that has been received, must be forwarded, in the form it has been received, to complaints@neotrades.com within the same working day, in order to be handled accordingly.

Once the Complainant submits its complaint with any of the abovementioned methods, the Company will acknowledge receipt of his/her complaint within five (5) days from the receipt of the complaint, by sending the relevant acknowledgment letter and/or email electronically to the Complainant’s registered email.

Handling of the received Complaint

Once the Company acknowledges receipt of the complaint it will review it carefully, investigate the circumstances surrounding the complaint and will try to resolve it without undue delay.

Upon the Company’s investigation if, based on the information provided, the grievance does not fall within the definition of “**complaint**” or is not considered to be a complaint it will be categorized as an enquiry and will be forwarded to the relevant department to be handled appropriately.

The Company shall make every effort to investigate the complaint and provide the Complainant with the outcome of its investigation within two (2) months from the date he/she has submitted his/her complaint.

During the investigation process the Company will keep the Complainant updated on the handling process of the complaint. One of the Company’s officers may contact the Complainant directly (including communication by email or phone) in order to obtain, where needed, further clarifications and information relating to his/her complaint.

In the event that the complaint requires further investigation, and the Company cannot resolve it within two (2) months, it will issue a holding response in writing or another durable medium. When a holding response is sent, it will indicate the causes of the delay and when the Company’s investigation is likely to be completed. In any event, the Company shall provide the Complainant with the outcome of its investigation no later than one (1) month from the issuing of the holding response, depending on the complexity of the case and his/her cooperation.

Please note that the Company shall consider any complaint as closed and cease the relevant investigation in case the Complainant fail to respond to its officers within the period of three (3) months from the date of the submission of his/her complaint.

Final Decision

The Company upon examining the complaint and reaching a decision to this respect shall inform the Complainant about its decision, in writing and in plain language, which is clearly understood, together with the reasoning of the Company's decision and any remedial measures (if applicable) it intends to take.

However, in order for the Company to take its final decision regarding the complaint, at least the following information should be provided by the complainant:

- a) **Name of the Complainant**
- b) The email the Complainant used to registered with the Company (**Registered Email**)
- c) The number of the Complainant's Trading Account which the complaint refers to (**Account No.**)
- d) A summary of the Complaint
- e) The amount that the Complainant's claims (**Disputed Amount**)

Record Keeping of Complaints

The Company shall maintain record of all complaints for a minimum period of seven years after the closure of the client's trading account.

Appendix A

COMPLAINT FORM

This is the form you need to fill in if you wish to submit your complaint to Neotrades Capital Ltd (the “**Company**”). Complete, up to date as well as accurate information is required to be provided to the Company for the proper investigation and evaluation of your complaint.

Please note that the below Complaint Form is only indicative and not exhaustive. The Company may request further information and/or clarifications and/or evidence as regards to your complaint.

Date:

Client's Information

Name:

Surname:

ID or Passport Number:

Legal Entity Name:

(in case the Client is a legal person)

Country of Nationality *(in case of Natural Person)* **or** Incorporation Country *(In case of Legal Person)*

Registered Address:

Account Trading Number:

Contact details of the client

Postal Address:

City/Province:

Code:

Country:

Telephone Number:

Email:

(Please advise your most convenient method of communication)

Details of the complaint

Date when the Complaint was created (date of the incident):

Disputed Amount (currency & amount):

Description of the Complaint:

(use a separate sheet if necessary)



Please enclose any relevant evidence and supporting documentation such as: screenshots, reports, error messages and error codes (if any) Submit the form to **complaints@neotrades.com**

