

# Complaint Handling Policy

Version: January 2019

## 1. GENERAL

Exinity Limited, hereinafter referred to as the “Company” or “ALPARI INTERNATIONAL”, maintains effective and transparent procedures for the reasonable and prompt handling of complaints/grievances received from Clients and keeps records of each complaint/grievance as well as the actions taken to remedy the situation.

## 2. DEFINITION

A complaint/grievance, is an expression of dissatisfaction regarding the investment and/or ancillary services provided to the Clients by the Company.

The complaints/grievances must be directed by the Client to the Company’s Compliance Department by filling out the relevant forms (Form in **Appendix 1** for Trading Operations complaints/ grievances, and Form in **Appendix 2** for Non-Trading Operations complaints/grievances) and submit to the Company by email: [complaint@alpari.org](mailto:complaint@alpari.org).

In case the Company receives a notice through the line of communication established by the Company to receive complaints, but which does not fall within the definition of 'complaint' above and can be characterized as an enquiry; this shall be categorized as an enquiry rather than a complaint and will be forwarded to the relevant department to be handled accordingly. The complainant maintains the right to request for the re-classification of his enquiry as a complaint.

## 3. PROCEDURE

The Compliance Department shall efficiently handle any complaint/ grievance received by the Clients. In case that the complaint/ grievance involves the Compliance Department, the complaint/grievance shall be handled by a member of the Senior Management.

Further to the above, the Compliance Department shall follow the procedure depicted below when handling Client complaints/ grievances:

- a) Once the Client files a complaint, an electronic acknowledgement of receipt will be sent to the email address of the Client to ensure that the Company has received the complaint and is currently working on a resolution. The Company should also provide to the Client via this email a reference number of the complaint for future reference.
- b) The Company upon examining the complaint/grievance and upon reaching a decision in this respect, shall reply to the Client with the remedial actions to be taken or provide further clarifications, and the reasoning behind the Company’s decision, as applicable.
- c) The Company shall reply to the said complaint/grievance (depicting also the remedial measures or clarifications furnished to the complainant)
- d) The Company shall document and keep in its records the following information:
  - i. the identity of the Client who filed the complaint/ grievance;

- ii. the name of the employee who undertook to provide the service to the Client;
- iii. the date of receipt of complaint/enquiry/grievance;
- iv. the subject and full description of the complaint/enquiry/grievance;
- v. the remedial action taken and/or further clarifications provided to the Client.

The Compliance Department shall make every effort to resolve the complaint/grievance within five (5) business days. When deemed necessary, the Compliance Department shall submit to the Senior Management the aforementioned details, for further investigation. In this case, the Company might take additional time to finalize the reply and therefore it shall duly notify the complainant about the causes of the delay and indicate when the Company's investigation is likely to be completed.

The Senior Management shall investigate further and coordinate with relevant heads of departments to attend to the subject of the complaint/grievance. A final response or a holding response will be sent to the complainant explaining the findings of the investigation. Where a holding response is warranted, the Company shall state the reasons why it has not been able to resolve the complaint/grievance and provide an indication of the time needed to resolve the issue.

#### **4. REPORTING AND RECORD KEEPING**

All decisions related to Clients' complaints/grievances shall be communicated to Clients in writing and copies shall be retained by the Compliance Department.

#### **5. COMPLAINT FORMS**

##### **Appendix 1**

##### **Type: Trading Operations**

Name:

Surname:

Email:

Account number:

Date/Time of the disputed situation (in EET, MetaTrader server time):

Number of all contested positions and/or pending orders:

Brief description of disputed situation:

How you feel this dispute could be settled:

**Please accompany this form with a screenshot of your Trading Terminal if you feel it would further support your claim request.**

## Appendix 2

### **Type: Non-Trading Operations**

Name:

Surname:

Email:

Account number:

Date/Time of the disputed situation (in EET, MetaTrader server time):

Brief description of disputed situation:

Clause(s) in the regulations on Non-Trading Operations, which in the complainant's opinion, have been breached:

How you feel this dispute could be settled:

**Please accompany this form with a screenshot of your Trading Terminal if you feel it would further support your claim request.**