

trader**x**lab

COMPLAINTS HANDLING PROCEDURE POLICY



1. Introduction

Camaroz Group LTD (**hereafter “the Company”**) is a company incorporated under the laws of Saint Vincent and the Grenadines that owns and operates the brand “**TraderXlab**” and the domain www.TraderXlab.com.

2. Scope and Purpose

The Company is required to establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints or grievances received from existing or potential clients as well as recording for the complaints/grievances received and the measures taken for its resolution.

Accordingly, the Company has adopted this Complaints Handling Procedure Policy (**hereafter “the Policy”**) in order to ensure a fair and quick process for the effective and efficient handling of complaints or grievances that may arise from the business relationship between the Company and its existing or potential Clients. This Policy sets out the method for the submission and handling of the complaints as well as the procedure to be followed by the Company’s personnel.

This Policy is applicable to all existing and potential clients and trading accounts opened with the Company.

3. Definitions

“Complaint” is defined as a statement of dissatisfaction, addressed to the Company by a complainant, relating to the provision of any investment and/or ancillary service(s) provided by the Company.

“Complainant” is defined as any person, natural or legal, who is eligible for lodging a complaint to the Company and who has lodged a complaint.

4. Submission Method

If a Client has a complaint against the Company, then his/her complaint should be submitted to the Back-Office Department of the Company which is duly authorized to handle and investigate complaints that may be submitted to it from our Clients.

The Company considers having a complaint when the Complainant has completed the *Complaints Form* attached herein as Appendix A and submits it to the Company in any of the following ways:



1. By submitting the Complaints Form electronically at the following email addresses: complaints@TraderXlab.com .

A Complainant shall be classed as eligible to lodge his/her complaint against the Company in the event that includes the following information:

- Name, surname and personal details of the client;
- Trading account number of the client;
- Date and time that issue occurred;
- Description of issue and complaint;
- Transaction numbers and/or financial instruments (if applicable);
- The services provided by the Company and related to the complaint;
- The employee responsible for the provision of those services and his/her department (if applicable);
- The magnitude of the claimed damage;
- Reference to any material correspondence relating to the complaint (i.e. the actual correspondence exchanged between the Company and the Client or ticket numbers)

The Company will not handle or investigate a complaint if the Complainant does not complete the Complaints Form hereto attached as Appendix A and/or does not provide sufficient information or evidence for the resolution of the complaint.

In such an event, the Company will revert to the Complainant and request him/her to provide the Company with additional information and/or further clarifications. The Company needs the Complainant's cooperation for the resolution of the complaint.

In the event that the complaint was not received in the manner described above (i.e. via post or the designated email), and was received through other channels of communication (i.e. via email, fax or chat to the sales agent or account manager or by another department or employee of the Company) then the complaint, in the form it has been received, will be forwarded by the recipient to the Back-Office Department within the same working day and a member of the Back Office Department will duly inform the client.

5. Complaint Handling Procedure

The Back-Office Department is responsible for the handling of clients' complaints or grievances. Their duties include the effective and efficient handling of client complaints or grievances so as to enable the Company to adopt and apply the required actions to prevent the repetition of the same complaints or grievances.

Upon receipt of a complaint or grievance, the Back-Office Department shall gather all relevant evidence and information regarding the said complaint/grievance and thoroughly examine the grounds of the complaint/grievance received (taking into account all the facts, information and/or documents received by the Complainant as well as any information and data contained in



the Company's archives/records and the Client's trading account) in order to reach a fair outcome.

If the Complainant is unsatisfied with the response he/she receives from the Back-Office Department or deems that the Complaint needs to be raised further, then the Complainant may escalate his/her complaint to the Compliance Department which will independently and impartially investigate it.

If the complaint involves the Back-Office Department then it is handled by the General Manager. If the complaint is against the Compliance Department, it will be handled by a member of the Senior Management.

The procedure which shall be followed by the Company following the submission of a complaint is as follows:

5.1. Acknowledging your Complaint

Upon receiving the complaint, a member of the Back-Office Department will register the complaint to an Internal Register by giving it a unique reference number and then send an electronic acknowledgement of receipt, within five (5) business working days from the day of the receipt, to the Complainant's registered email address and provide him/her with the following information:

- The Company's complaints handling process.
- The unique reference number.
- How to lodge a complaint and the type of information required by the Complainant.
- The person/department who is handling the client's complaint and their contact details.
- What is the indicative handling time (i.e. 14 working days)
- Any further information and/or clarifications required from the client for the successful resolution of the complaint.
- The fact that the complaints procedure is free of charge.

If the grievance does not fall within the definition of "complaint" (as specified in paragraph 3 above) or is not considered by the Company to be a complaint, it will be categorised as an "enquiry" and will be forwarded to the relevant department to be handled accordingly. Nonetheless, the Complainant reserves the right to request for the reclassification of his/her enquiry as a complaint.

The Company considers as an "enquiry", including but not limited, the following: change of password/email/personal details, losing the credential login details, closing down the trading account, client does not wish to receive newsletters/promotional material/advertising emails, client cannot see his/her deposit amount/financial instruments/transaction history etc.



5.2. Handling of your Complaint

Once the Company acknowledges receipt of the Complainant's complaint it will be reviewed carefully, investigate the circumstances surrounding his/her complaint and will try to resolve it without undue delay.

The Company shall make every effort to investigate the Complainant's complaint and provide him/her with the outcome of its investigation within two (2) months from the date of submission of his/her complaint. During the investigation process, the Company will keep the Complainant updated of the process of his/her complaint. One of the Company's officers may contact the Complainant directly (including communication by email or phone) in order to obtain further clarifications (where needed) and information relating to his/her complaint.

Please note that the Company shall consider the Complainant's complaint as closed and cease to act further on the relevant investigation in the event he/she fail to respond to the Company's officers within the period of three (3) months from the date of the submission of his/her complaint. The Company requires the Complainant's full cooperation in order to expedite the investigation and reach an outcome.

In the event that the Company is unable to provide a response to the Complainant within the handling time given (i.e. because his/her complaint requires further investigation) and cannot be resolved 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 our 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. This period of time cannot exceed three (3) months from the submission of the complaint.

5.3. Final Decision

When the Company reaches an outcome, it will inform the Complainant of its decision in writing and in plain language which is clearly understood, together with an explanation of the Company's position and any remedy measures it intends to take (if applicable).

If a situation arises which is not expressly covered by the Back-Office Department, then the parties agree to try to resolve the matter on the basis of good faith and fairness and by taking the necessary actions which are consistent with the current market practices.

6. Verbal Complaints



It is the Company's Policy not to accept any verbal complaints or grievances. Should any of the Company's employees (regardless of department) or associates or affiliates or business partners/ introducers receive a verbal complaint, then the recipient will duly inform the Complainant of the following:

- The Company's Complaints Handling Policy;
- That all the complaints must be made in writing by completing the *Complaints Form* hereto attached as Appendix A; and
- By submitting the complaint with one of the submission methods outlined above (i.e. via email or post).

Once the Complainant completes and submit his/her complaint in the manner described above, then the Complaints Handling Procedure shall be followed as described in Paragraph 5 herein.

7. Monitoring and Reporting

On a monthly basis, the Head of the Back-Office Department will:

- (a) Send a report to the Company's Compliance Department with an analysis of the complaints' handling data regarding the complaint causes and/or any recurring or systematic problems and/or any potential legal, operational or compliance risks. Accordingly, the Compliance Function will identify whether there is any failure/weakness of the procedures followed or in the internal controls and take relevant corrective action, if necessary. All suggested procedures/corrective action shall be sent for approval to the Board of Directors following completion of the investigation procedure.

8. Record Keeping

Once the complaint is concluded the Company shall maintain a Complaints' Register outlining all complaints for a minimum period of 5 (five) years, after the closure of the client's trading account, including the following information:

- Name/surname and personal details of the complainant;
- Trading account number of the complainant;
- Identification documents of the complainant;
- Complaint cause;
- Date and time the issue arose;
- The service/department to which the complaint refers to;
- The employees responsible for the services rendered to the client and their position;
- Description/content of the complaint;
- The capital and value of the affected financial instrument(s);
- The disputed amount;
- The magnitude of the claimed damage;



- Date of receipt and date of registration of the complaint;
- Course of action(s) taken;
- Information, data, evidence gathered;
- The department(s) involved in the complaint investigation along with the names of the responsible employees;
- Complaint outcome and how it was reached;
- Resolution date;
- Any remedial measures taken;
- Any conflicts of interests identified;
- Any comments/settlements/notes;
- Any correspondence exchanged between the Company and the Client in relation to the complaint.

The responsible department shall be the Back-Office Department.

9. Amendments and Review

The Company will review this Policy at least annually and/or whenever a material change occurs in the law or in the Company's internal procedures/arrangements regarding the handling of complaints or whenever the Company deems it necessary in order for the Policy to reflect its actual procedures in place and take any relevant corrective measures.

10. FAQs

Should you have any questions about this Policy or require further clarifications please direct your request to complaints@TraderXlab.com.



APPENDIX A: COMPLAINTS FORM



COMPLAINT FORM

Name and Surname:

Account Number:

Residential Address:

Telephone Number:

ID or Passport Number:

Country of Nationality: Email:

Other Information:

Date of which Complaint was created: Employee who offered the services to the Client
(if applicable):

Affected Transaction:

Claimed Damage: Time at which issue arose: Services provided by the Company and related
to the Complaint:

Brief Description

Please enclose any other relevant evidence and supporting documentation such that may be applicable and assist us with your complaint.



With my signature below, I hereby confirm and certify that to the best of my knowledge, the information furnished above is true, accurate, correct and complete.

Signature:

Date:

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 your complaint.

FOR INTERNAL USE ONLY

Received on:

Received by:

Assigned to:

To reply by: