HF Markets (SV) Ltd

COMPLAINTS HANDLING POLICY

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1. Introduction

1.1. **HF Markets (SV) Ltd** (hereinafter referred to as the "**Company"**), is incorporated under the laws of Saint Vincent and the Grenadines with Registration 22747 IBC 2015, having its registered office at Suite 305, Griffith Corporate Centre, P.O. Box 1510, Beachmont, Kingstown, Saint Vincent and the Grenadines. The Company is registered as a Business Company under the Business Companies (Amendment and Consolidation) Act, Chapter 149 of the Revised Laws of Saint Vincent and Grenadines, 2009 (herein the "**Act**").

1.2. The objects of the Company are all subject matters not forbidden by the Business Companies (Amendment and Consolidation) Act, Chapter 149 of the Revised Laws of Saint Vincent and the Grenadines, 2009, in particular but not exclusively all commercial, financial, lending, borrowing, trading, service activities and the participation in other enterprises as well as to provide brokerage, training and managed account services in currencies, commodities, indexes, CFDs and leveraged financial instruments.

1.3. The Company is committed to conducting its business with integrity and professionalism and to having in place fair, transparent and well-documented complaint management processes, in keeping with international best practices and the laws of Saint Vincent and the Grenadines, as applicable.

1.4. Accordingly, the Company has implemented and maintains a Complaints Handling Policy (the "**Policy**"), which is described in this document. The Company recognises that complaints provide valuable information about its products, services, employees, systems and business practices. Complaints will therefore be treated as an opportunity to address and/or correct problems, improve service quality and aid in operational risk management.

2. Interpretation of Terms

2.1. Unless the context requires otherwise, all terms included in this Policy shall have the meaning given to them herein. Where the context requires, (a) words importing the singular shall include the plural and vice versa and (b) words importing the masculine shall include the feminine and vice versa.

3. Purpose of the Policy

3.1. The Company will seek to maintain an effective, accessible and transparent process for receiving, recording, investigating, resolving and monitoring complaints relating to its services, trading platform, account administration, client communications and relevant related services.

3.2. The purpose of the Policy is to establish a formal complaint handling framework which clearly sets out the internal complaint resolution system and procedures which the Company has established, maintains and follows for the resolution of complaints.

3.3. The objectives of the Policy are to provide Clients with an accessible means of making a complaint; to ensure that complaints are properly recorded, investigated and resolved fairly, consistently and without undue delay; to provide appropriate remedies where a complaint is upheld; and to identify recurring or systemic issues so that they may be escalated to senior management and used to improve the Company's services and internal processes.

3.4. General enquiries and routine service requests (for example, a request for an update on the status of a withdrawal) are handled by the Company's Customer Support team and are not treated as complaints, unless the Client expresses dissatisfaction with the Company's service or response.

4. Definition of a Complaint and a Complainant

4.1. A complaint is an expression of dissatisfaction by a Client regarding the services provided to him by the Company, where a response, investigation, explanation or resolution is expected. A complaint does not need to contain the word "complaint", or to be legally justified, in order to be treated as a complaint.

4.2. A Complainant is the person, natural or legal, who has lodged a complaint with the Company, or on whose behalf a complaint has been lodged.

4.3. A complaint may be lodged by a current or former account holder in relation to his trading account(s). The Company may also accept a complaint lodged by a third party (such as a legal representative, an Authorized Person or an Introducer) acting on behalf of a Client, provided that the Client has granted written authorization, which must be presented to the Company as evidence of such authorization. The Company may verify the authorization directly with the Client before disclosing any information and, unless the Client instructs otherwise in writing, will communicate its findings and decision directly to the Client.

4.4. A complaint shall include:

(a) the Client's name and surname;

(b) the Client's trading account ID;

(c) the affected transaction/order (ticket) number(s), if applicable;

(d) the date(s) and, for trading-related complaints, the approximate time (platform server time) that the alleged issue arose, and a detailed description of the alleged issue;

(e) any tangible evidence: emails, screenshots, documents and/or relevant material.

4.5. A complaint must not include offensive language directed either to the Company or a Company employee. Where a complaint contains such language, the Company will nonetheless consider its substance, but may ask the Client to communicate in a respectful manner and reserves its rights under the Client Agreement.

4.6. A complaint will not be treated as vexatious merely because the Complainant is persistent, disagrees with the Company's decision or the complaint is strongly worded. Where a Complainant engages in threatening, abusive or unreasonable conduct, or repeatedly raises a matter on which the Company has already issued its final response without providing any new information or evidence, the Company may set proportionate limits on further communication on that matter and refer the Client to its final response. Such limits shall not prevent a new or legitimate complaint from being properly considered.

5. Procedure

5.1. All complaints must be in writing and shall be addressed to the Company's dedicated email address for complaints to ensure proper handling. A Client who wishes to proceed with filing a complaint is requested to address it to: complaints@hfm.com.

5.2. Upon receiving the complaint, the Company shall promptly acknowledge its receipt and notify the Client via email.

5.3. Within five (5) business days of receiving the complaint, the Company will provide the Client with a unique reference number to be used in all future correspondence related to this specific matter. In the same communication, the Company will confirm that the complaint is being examined and inform the Client that an official response will be provided once the internal investigation has been completed.

5.4. The Company shall thoroughly examine all complaints as required (taking into account any information contained within the books and records of the Company, including but not limited to the Client's trading account history) without undue delay.

5.5. The Company will not be able to properly handle or investigate a complaint, if the requirements included in paragraphs 4.3 and 4.4 above are not fulfilled. In such an event, the Company shall revert to the Client and request him to send any additional information. In any event, one of the Company's officers may contact the Client directly in order to obtain further clarifications and information relating to his complaint. The Company shall need the Client's cooperation in order to handle the complaint.

5.6. Upon completion of the investigation, the Company shall send its final response to the Client within fifteen (15) business days from the date of the receipt of the complaint.

5.7. If the complaint requires further investigation and cannot be resolved within fifteen (15) business days, the Company will issue a holding response outlining the reasons why the matter has not yet been concluded and indicating when further communication can be expected. In such cases, a final response will be provided within thirty (30) business days of receiving the complaint.

5.8. If the Company does not manage to conclude its investigation and/or respond to the complainant within thirty (30) business days from the date of receipt of the complaint, the Company shall send a written notice explaining the reasons for not reaching a decision and/or concluding the investigation yet, the reasons for the delay as well as indicate the period of time within it shall be able to complete the investigation. It is noted that the Company shall not provide its response later than two (2) months from the date of the submission of the complaint.

5.9. The Company's response will set out its findings, its decision (whether the complaint is upheld, partially upheld or not upheld), any remedy offered and the reasons for its decision, with reference to the relevant provisions of the Client Agreement.

6. Guiding Principles of the Policy

6.1. The Company will manage complaints in accordance with the following principles:

a) **Accessibility:** Clients are able to make complaints free of charge, through a clearly published channel and without unnecessary barriers.

b) **Fairness:** complaints are considered objectively, consistently and on the basis of the available evidence.

c) **Independence:** where reasonably practicable, a complaint is investigated by a person who was not directly involved in the matter giving rise to the complaint.

d) **Timeliness:** complaints are acknowledged, investigated and resolved without undue delay and within the timeframes set out in Section 5.

e) **Transparency:** the Company explains its complaints process and, where appropriate, the reasons for its decision.

f) **Confidentiality:** all complaints are treated confidentially, in accordance with the Client Agreement and the Company's Privacy Policy.

7. Client's Rights

7.1. While the Company encourages clients to resolve any concerns directly through its comprehensive internal complaint handling process, clients retain the right to seek alternative dispute resolution or legal remedies independently if they remain dissatisfied with the outcome. In accordance with the Client Agreement, any legal proceedings shall be brought before the competent courts of Saint Vincent and the Grenadines.

8. General Conditions

8.1. A complaint will be considered closed if four (4) weeks have passed since its submission and the Client has not responded to the Company's investigating officer's requests, preventing further investigation.

8.2. Clients' complaints will be assessed in accordance with the Client Agreement and the Company's legal documentation forming part of it, which the Client had to read, agree and accept prior to establishing a business relationship with the Company, as well as all relevant information about the Company's services and procedures, which have been specifically or otherwise duly or publicly disclosed.

9. Maintenance of a Complaints Register and Record Keeping

9.1. The Company has established, maintains and updates a Complaints Register with details of all the complaints received per month for a period of seven (7) years. The following information is recorded in the Complaints Register:

(a) Unique Reference Number
(b) Date of the complaint;
(c) Client's full name;
(d) Client's trading account ID;
(e) Client's country of residence;
(f) Disputed amount;
(g) Complaint cause;

(h) any comments thereof.

9.2. The Company retains the complaint file, including all correspondence, the evidence reviewed and the reasons for its decision, for the same period.

10. Policy Review and Internal Use of Complaints Data

10.1. The Policy and the procedures set out herein shall be reviewed annually, or earlier, where there are any applicable changes in the law or legal requirements, and/or based on the Company's analysis of complaint trends.

10.2. The Company shall regularly review complaints to identify what, if any, of the following issues arise: systemic operational problems or other issues of concern, product or service weaknesses, need for greater employee training, and/or emerging compliance risks. Trend analysis of complaints will be utilized to help prevent future complaints. Complaints data will also be utilized by the Company as part of its operational risk assessments and management and aid in compliance monitoring.

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