



Website Complaint Handling Policy

OCTOBER 2020



General

The Company established and implemented effective internal procedures to ensure the prompt and reasonable handling of complaints or grievances received from clients and to ensure that any appropriate remedial action on those complaints is promptly taken.

The Company ensures that any written complaint it receives in relation to the conduct of its business is:

- a. acknowledged and entered into a register of complaints
- b. brought to the attention of a person having the appropriate authority to deal with complaints within the licensee
- c. investigated promptly and thoroughly, and
- d. appropriately dealt with and recorded accordingly.

The Company maintains a client complaint register that contains copies of all client complaints and the measures taken for the complaints resolution. The register of complaints must also contain:

- a. the date the complaint was made
- b. the date the complaint was reported to the person with authority to deal with complaints
- c. details of the nature of the complaint and the name and address of complainant, and
- d. details of how and when the complaint was investigated and the actions that were taken.

The Clients' complaints or grievances are handled by the Compliance Officer, and the final settlement of complaints or grievances are approved by a Senior Manager.

The Company contemplates that any complaints to be received might relate to platform surface, trading orders or client's funds. However, the Company will make sure that it will not get to this point and grievances will be avoided or arise only in exceptional circumstances.

If the provided investigation results do not fully satisfy the complainant's demands, the Company provides to the complainant in writing a thorough explanation of its position on the complaint and set out the complainant's option to maintain the complaint e.g. through FSA, FIU, or the relevant Courts.

GLOFSA Contact Details:

In a formal letter addressed to the Global Financial Services Authority sent to:



The Chief Executive Officer
CC. Policy (Information & Communication Unit)
Global Financial Services Authority,
Majuro,
Majuro Atoll 96960,
The Republic of the Marshall Islands

By Email ID: compliance@baxiamarkets.com
By Tel: +357 22 222033
By Fax: +1 214 269 5922

Procedure

The procedure which shall be followed by the Company when handling client's complaints or grievances is as follows:

1. Filing Complaints

Any client who wishes to submit a complaint or grievance is advised to complete a Complaint Form and to send it to the Company in one of the following ways:

- By email to the Company, which will be procured.
- By post to the Company's business address, which will be procured.

The clients can submit complaints free of charge.

2. Complaint Form

In order to ensure the correct details are obtained from the complainant, a copy of the 'Complaints Form' and Complaint Policy are provided on the Company's website [<https://baxiamarkets.com/>].

Upon receiving a written complaint or grievance, the following details shall be obtained and recorded by the Compliance function:

- The identification particulars of any client having made a complaint or grievance.
- The service provided by the Company and related to the complaint or grievance.
- Date of receipt and registration of complaint or grievance.



- Content of the complaint or grievance.
- The capital and the value of the financial instruments which belong to the client.
- The magnitude of the damage claimed by the client.
- Reference to any correspondence exchanged between the Company and the client.

The Clients' complaints or grievances are handled by the Compliance Officer, and the final settlement of complaints or grievances are approved by a Director. The average estimated time for a complaint that is expected to be resolved is an average of 10 working days from the day of the submission of the complaint. However, it is the Company's aim to proceed with the resolution of the relevant complaint as soon as possible.

The Company shall maintain all the record of the client's complaints for a minimum period of seven years. Responsible Department shall be the Back-Office Department.

This policy does not indicate specific types of complaints that are expected to be reported as the Company does not expect for any complaints to occur. However, in the case that a complaint is reported the Company will treat each complaint separately.



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