EDGEWATER

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Edgewater Markets International

COMPLAINTS HANDLING AND DISPUTE RESOLUTION POLICY

Company No 235030 | Licence No GB26206104

1.0 Introduction

This policy regulates effective, clear and fast handling of complaints and disputes Edgewater Markets International, hereinafter referred to as 'the Company' or 'we', in relation to the performance and procedures of the Company.

The Company maintains Records of Complaints and a structured dispute resolution process. The Company must develop and put into practice an independent and objective complaints and dispute resolution system that includes:

- A written Policy (made available on the Company's official website) that sets out how complaints and disputes will be handled, including:
    - How to lodge a complaint or dispute regarding the company's actions or decisions;
    - Time frames for decisions regarding complaints;
    - Information to be provided to complainants;
    - Options available when a complaint or dispute is not resolved
- Effective communication of the company's Complaint Handling and Dispute Resolution Policy to clients,
- A complaints register that records details of complaints and disputes and their progress;
- Referral arrangements to external dispute resolution resources for disputes that cannot be resolved through the internal resources of the company.

1.1. Definitions

A. Complaint:

- Complaints are defined as specific requests or claims related to the services or products of the Company, which objects the performance or expresses negligence of the Company and lodges a relevant, specific and clear demand.

- Asking an opinion or position about any specific case or requesting general information about the operation and services of the Company shall not constitute a complaint.

B. Complainant:

- The Complainant could be a natural or legal person, a company without legal entity or other organization that requires services of the Company or the addressee of information or offer related to the service.
- When the complaint is submitted by a representative or other duly authorized person, the Company will investigate the legal basis of the submission, which must be presented by the Complainant in a format required by law. If no authorization is available, the Company will approach the Complainant directly in order to accelerate the procedure.

C. Dispute:

Means an unresolved complaint - In other words, it is a matter that has been dealt with as a complaint under this Policy, but where the complainant is still not satisfied with the outcome.

D. Dispute Resolution:

Dispute resolution refers to the processes by which disputes are brought to an end. This can occur through:

- A negotiated outcome, where the parties concerned sort out things themselves;
- A mediated outcome, where the parties use the services of an independent mediator to help them arrive at their own agreement; or
- An arbitrated or adjudicated outcome, where an independent arbitrator or court determines how the dispute is to be resolved and makes a binding decision or order to this effect

1.2. Submitting a Complaint

The Complainant, if possible, should report the event or the date of the occasion subject of the complaint to the Company as soon as possible. This is necessary to enable the Company to investigate the complaint as efficiently as possible.

The following opportunities are available for submitting a complaint to our Company:

- by mail,
- by e-mail, or
- in writing.

The Customer Service Representative (CSR) shall help the Complainant in compiling and submitting the complaint. The Complainant must submit complaints related to services rendered on the basis of online trading agreement to the CSR. Contact of the Customer Service Department is available at the homepage of the Company all the time. CSRs shall forward the complaint to the Compliance officer of the Company.

The Company does not provide direct telephone line to the customers but does provide an 24/5 LiveChat and email services which can be used to submit complaints in writing. Should the customer request a telephone conversation, CSR may make the outbound calls to the relevant customer and the recordings are stored.

If you wish to submit your complaint personally, you can visit the head office of the Company in office hours (8:00 -17:00 hours on working days).

If you wish to submit your complaint in writing, please attach - if possible - copies of documents supporting your complaint to your application. The Company receives complaints submitted by e-mail on an ongoing basis.

1.3. Registration of Complaints

The Company shall register all complaints until they are resolved. This register shall record at least the following information:

- description of the complaint,
- description of the event or fact subject of the complaint,
- date of submitting the complaint,
- measures implemented to settle or solve the complaint,
- in case of rejection, the reasoning of the rejection,
- deadline of managing the complaint,
- name of the person responsible for the execution,
- date of responding to the complaint.

The Company pays special attention to avoid collection of data about the complainant with the exception of recording data aimed to settle the complaint. All personal particulars obtained in relation of managing the complaint shall be deleted from records or made unsuitable for identification.

The Company manages complaints within a transparent system; they could be traced and administered in each and every stage of the procedure.

The Company records a written memorandum on all submitted complaints. For this purpose, the Company is entitled to use a complaint format or to register the complaint electronically. The Company hands over or mails one copy of the complaint to the Complainant. The Company records all telephone conversations between the CSR and the Complainant and keeps the voice record for the period of one (1) year. The Complainant shall be informed about this at the beginning of the conversation. The Company shall make this record available for listening and shall make the certified memorandum registered about this voice record available to the Complainant.

1.4. Managing Complaints

The Company manages all complaints and Complainants equally, without any discrimination, in harmony with the procedure regulated by this Policy.

1.5. Disputes with Customers

To maximize the chance of a successful resolution the Complaint Handling and Dispute Resolution will:

- Listen to what the complainant has to say
- Request documentary evidence if required to verify the facts;
- Negotiate in a calm and professional manner;
- Understand the company's legal obligations seeking advice from the relevant consumer organization depending on the nature of the dispute;
- Provide accurate information on the options available to the complainant for resolution of the issue.

1.5.1. Dispute Provisions in Contracts or Letters of Engagement

We will include clauses that address the joint problem of solving disputes provision in contracts/ letters of engagement:

- Early notification of issues and informal discussion to seek a resolution;
- A process for raising continuing issues with the other party more formally in writing, setting out grounds and preferred solutions, and requiring the party to make every effort to resolve disputes fairly;
- The use of an informal negotiator (such as an industry association, business adviser or employee representative) to assist in finding a solution;
- Provision for the use of alternative dispute resolution, such as mediation or conciliation.

1.6. External Dispute Resolution Options

The Company will have the available options for external dispute resolution and the appropriate option for any particular dispute. Successful use of external dispute resolution will involve a number of steps, as set out below:

Step 1 - Understand the Dispute

Step 2 - Understand Dispute Resolution Options

Step 3 - Select the Appropriate Dispute Resolution Method

Step 4 - Access an Alternative Dispute Resolution Provider

Step 5 - Prepare for the Alternative Dispute Resolution Process

Step 6 - Working Towards a Successful Resolution Outcome

If you are contacting us on behalf of another person, we may ask you to provide a proof of that person's consent to your handling of their Complaint. We aim to resolve the matter within five (5) business days depending on the nature of the complaint and ensure that the maximum time to respond to complaints do not exceed 30 days.

A. Compliance Officer

All complaints are handled by the Compliance Officer, who is also the complaint handling person.

B. Directors of the Company

Within the organization of the Company, Directors of the Company represent the highest level of authority in deciding the settlement of complaints. Directors of the Company shall settle those complaints which cannot be managed within the above procedure; they shall take into account the opinion of the Compliance officer of the Company.

The employee of the Company who participated in the measure related to the complaint or made a decision subject of the complaint must not participate in making any decision related to the complaint. Such employee must provide every reasonable help to the Company in the procedure aimed to settle the complaint as soon as possible and in the interest of the Complainant.

1.7. Response to Complaints

The Company follows the outlined procedures to ensure that your Complaint is resolved within a period of thirty (30) business days. This response, including the reasoning, is always provided to the Complainant. Some Complaints can be resolved more quickly depending on the facts and the nature of the Complaint. If the Complaint is more complex and takes longer than thirty (30) business days to resolve, we will communicate the reasons for the delay.

Sometimes you are requested to supply additional information required for investigating the complaint. In this case please respond at your earliest convenience.

When the complaint is submitted by another person or with a method unsuitable for establishing proper authorization of the submission, The Company may ask the person authorized to submit the complaint to confirm the complaint in question.

The Company adds a correct, clear and unanimous reasoning to every decision brought down in order to settle complaints, which are mailed to the Complainant in writing. If the decision refers to a legislation, not only the legislation, but its relevant regulations must also be included in the above reasoning. In parallel with informing the Complainant about the decision in question, the Company informs the Complainant about the opportunities of appeal and possible damage compensation.

1.8. Monitoring of Complaints

After settling the procedure, the Company shall preserve every written or electronic documents related to complaints for a period of 7 years. The Company

shall be entitled to prepare statistics and reports about complaints, which will be aimed to improve the efficiency of administering complaints.

1.9. Settlement of Disputes

When disputes between the Company and the Complainant cannot be settled by the official procedure, regulations of chapter "Settlement of Disputes" of the Company Rules and Regulations shall be applicable. When the complaint is rejected, the Complainant may lodge a complaints at the Financial Services Commission (Mauritius), or with the other competent authorities.