



COMPLAINT HANDLING POLICY

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Contents

1. Introduction.....	1
2. Definitions.....	1
3. Company’s Internal Escalation Procedure.....	1
4. Escalation to FSA	2
5. Client Records.....	3
6. Consumer Awareness.....	3
7. Discrimination against Clients who have lodged complaints	3
8. Confidentiality and Conflict of Interest	3
Complaint Form.....	4

1. Introduction

Trinota Markets (Global) Limited (hereinafter the “Company”) aims to provide superior services to all of its clients.

The Company has appointed a Compliance Officer to oversee the proper handling of any complaints from Clients, in compliance with the Financial Consumer Protection (Complaint Handling) Regulations 2024. The Compliance Officer does not directly handle routine complaints, but ensures that the complaints-handling process is carried out effectively, and intervenes only in complex or high-risk matters.

2. Definitions

The Company classifies complaints as follows:

- **Complaint:** means any objection and/or dissatisfaction that the Client may have with regards to the provision of the products or services provided by the Company or the conduct of the Company in the provisioning of products or services. A complaint form is enclosed at the end of this policy.
- **Frivolous Complaint:** A complaint which has no serious purpose or value.
- **Vexatious Complaint:** A complaint intended to cause inconvenience, harassment, or unnecessary expenditure.

3. Company’s Internal Escalation Procedure

1. Primary Handling

All complaints will be handled in the first instance by the Complaints Handling Unit established for this purpose. The person assigned will ensure that complaints are logged, acknowledged, investigated, and resolved in accordance with this policy and applicable regulations.

2. Oversight & Escalation

The Compliance Officer will monitor and review the complaints register and supporting documentation to ensure regulatory compliance and identify trends or systemic issues.

Where a complaint is assessed as complex (e.g., involving multiple issues, requiring in-depth investigation) or high-risk (e.g., potential regulatory breach, significant financial impact, reputational damage), the matter will be escalated to the Compliance Officer for direct involvement.

3. Conflict of Interest

If a complaint involves any of the individuals responsible for handling it, the matter will be reassigned to another designated officer or escalated to the Compliance Officer for independent oversight.

4. Lodging a Complaint

A client can lodge a complaint by completing the complaint form using any of the following methods:

- **Email:** complaints@m4markets.com
- **By post:** *Trinota Markets (Global) Limited JUC Building, Office No. F4, Providence Zone 18, Mahé, Seychelles*

5. Acknowledgement & Response Times

When the Company receives the Client's complaint then a written acknowledgement will be sent to the Client within 2 business days. The acknowledgement will include:

- a) the timeframe by when the client will receive a response;
- b) details of a designated person to contact regarding the complaint; and
- c) reference number for the complaint.

A response will be provided within 21 business days. For grossly complicated complaints requiring extended investigation, the Client will be informed in writing, with an extended timeline of 90 business days.

In the case where the client is still not satisfied with the Company's final response, then the client can refer his/her complaint with a copy of the Company's final response to the Financial Services Authority (FSA) in Seychelles for further examination.

4. Escalation to FSA

1. Prior lodging the complaint to the FSA

- In order for the Client to be able to contact the FSA for further examination it is required to demonstrate to the FSA that all possible options have been exhausted to resolve the matter directly with the Company. For this purpose, the Client should follow the Company's escalation procedure as indicated above for the investigation of the complaint by the Company before lodging a complaint to the FSA.
- It is further noted, that the FSA shall not attend to any complaint, unless it is satisfied that the matter has been brought to the attention of the Company and both the Client and the Company have failed to reach a mutually agreeable solution on the matter.

2. Lodging the complaint to the FSA

The contact details for the FSA in Seychelles are set out below:

Address:	PO Box 991 Bois de Rose Avenue Roche Caiman Victoria, Mahe, Republic of Seychelles
Phone:	(+248) 438 08 00
Fax:	(+248) 438 08 88
Website:	https://fsaseychelles.sc/complaint-handling

5. Client Records

The Client should provide all relevant documentation as well as any additional information requested by the Company in order to ensure all records are collected and the complaint is properly resolved on time.

All records will be kept safe as per local requirements and for a period of seven (7) years. The Company shall provide all complaint related information to the FSA within 1 business day from the date of receipt of the request from the FSA.

6. Consumer Awareness

The Company shall provide clear information on complaint-handling procedures to all Clients at the time of onboarding and ensure this information is accessible through leaflets, the Company website, and other appropriate means.

7. Discrimination against Clients who have lodged complaints

The Company will not penalize or discriminate against Clients who exercise their rights by lodging complaints.

8. Confidentiality and Conflict of Interest

The Company will maintain strict confidentiality when handling all Clients' complaints. Complaints involving a conflict of interest will be handled by a designated independent officer.

[The complaint form can be found on the next page]

Complaint Form

A. Client Information:

Name:	Account Number:
Address:	Telephone Number:

B. Type of Complaint

1. Execution of Orders	<input type="checkbox"/>
2. Quality or lack of information provided	<input type="checkbox"/>
3. Terms and Conditions/Fees/Charges	<input type="checkbox"/>
4. General admin/Client Services	<input type="checkbox"/>
5. Unauthorized business being offered	<input type="checkbox"/>
6. Issue in relation to withdrawal of funds	<input type="checkbox"/>
7. Other (specify)	<input type="checkbox"/>

C. Brief Summary of the Complaint:

Please describe the product or service you are complaining about (*description, evidence, amount and suggested way to be solved*):

- *Please enclose any other relevant documentation that may help us to handle the complaint.*
- *Possible documentation to be provided (client statement, correspondence with the Company as well as any other supporting documentation to be requested by the Company which is relevant to the Client's complaint)*

Date and place

Client Signature

<i>For internal use only:</i>	
Complaint Received By:	Date:
Acknowledgement sent to Client:	<input type="checkbox"/> Yes - <input type="checkbox"/> No
Informed Client of initial action:	<input type="checkbox"/> Yes - <input type="checkbox"/> No
Final response provided to Client:	<input type="checkbox"/> Yes - <input type="checkbox"/> No
Holding response provided to Client:	<input type="checkbox"/> Yes - <input type="checkbox"/> No - <input type="checkbox"/> N/A