

MAGNUM INTERNATIONAL MARKETS LTD

COMPLAINTS HANDLING POLICY

CONTENTS

1. INTRODUCTION	PAGE 3
2. SCOPE OF POLICY	PAGE 3
3. DEFINITION OF COMPLAINT	PAGE 3
4. PROCESS TO LODGE A COMPLAINT	PAGE 3
4.1 HOW TO FILE A COMPLAINT	PAGE 3
4.2 HANDLING COMPLAINTS	PAGE 3
4.3 REJECTING COMPLAINTS	PAGE 4
5. ESCALATION OF COMPLAINTS	PAGE 4
6. TIMELINE TO RESOLVE COMPLAINTS	PAGE 5
7. RECORD KEEPING REQUIREMENTS	PAGE 5
8. UNRESOLVED COMPLAINTS	PAGE 5
9. REVIEW AND TESTING OF THE COMPLAINT HANDLING POLICY	PAGE 5
10. TRAINING	PAGE 5
COMPLAINTS FORM	PAGE 6
INTERNAL USE FORM	PAGE 7

1. INTRODUCTION

Magnum International Markets Ltd (the “Company”) regulated by the Seychelles Financial Services Authority (FSA) (License No.SDL 132 aims to provide all its customers/clients (the “clients”, the “customer”) with the highest standard of service.

As part of our commitment to providing the best possible service to our clients, the Company upholds effective and transparent procedures for prompt complaint handling for existing and potential retail clients and the Company maintain records of complaints and measures taken for complaint resolution, in line with applicable Seychelles laws.

2. SCOPE OF POLICY

The Complaints Handling and Disputes Policy sets out the processes followed when dealing with Complaints received by customers/clients.

3. DEFINITION OF A COMPLAINT

A “Complaint” is a statement of dissatisfaction formally addressed by the Client to the Company regarding the provision of investment and/or ancillary services provided by the Company.

A “Complainant” is any client which is eligible for filing a complaint.

4. PROCESS TO LODGE A COMPLAINT

4.1 HOW TO FILE A COMPLAINT:

- a. If a client wishes to lodge a complaint, he/she must provide the following information to the Company in writing to the following email address: legal@intermagnum.email. All complaints must be in writing and shall be addressed, in the first instance, to the Customer Support Department.

All clients shall provide the following details when submitting their complaints via email and use the form in the link: [INTERMAGNUM-COMPLAINT-FORM.pdf](#)

- 1) the client’s name and surname;
- 2) the client’s trading account number;
- 3) the affected transaction(s) numbers
- 4) the date and time of the disputed issue/trade;
- 5) a brief description of the issue.
- 6) reference of any correspondence exchanged between the Company and the client.

4.2 HANDLING COMPLAINTS:

- Upon receipt of the complaint, the client shall receive a formal written acknowledgement (via email or by phone call) within five (5) business days by the relevant Department in which it will advise the client the complaint was received and is under review.
- The complaint will be reviewed and if deemed necessary it will be escalated to the Compliance

Department, where the complaint will be addressed to be further verified and investigated.

- The events leading to the complaint or grievance and all the information provided by the client, will be examined and assessed for the purpose of reaching a fair outcome for both sides.
- The client will be constantly informed by the Company regarding the handling process of his/her complaint. Particularly, about the findings and proposed solutions that shall be clearly explained in written form to the client within the agreed time frame.
- If an issue cannot be resolved within the specified period due to the complicated nature of the complaint or if further clarification of circumstances is required, the complainant shall be notified about the new timeframes of response for the complaint. In the event that the Company is unable to respond within a certain time period, it informs the complainant about the reasons for the delay and indicates the period of time within it is possible to complete the investigation.
- In case the Support Department is unable to respond within a certain time period, it informs the complainant of the reasons for the delay and indicates the period of time within it is possible to complete the investigation.

4.3 REJECTING COMPLAINTS:

- The Company has the right to refrain from reviewing a complaint when:
 - The complaint does not comply significantly with the format requirements as outlined in Section 4.1 – How to file a complaint.
 - It does not enable us to identify the applicant's identity.
 - It includes offensive language directed either to the Company or towards an employee of the Company.

In such a case, the client shall be notified with the reasoning for why the complaint was not taken into the review process.

All complaints will be treated strictly confidential.

4.4 POST TERMINATION COMPLAINT RIGHTS

Notwithstanding the termination or expiration of the agreement between the Client and the Company, the Client shall retain the right to submit a formal complaint for a period of up to two (2) years from the effective date of such termination or expiration. All complaints must be submitted via the official communication channels as specified by the Company at the time of submission. Complaints submitted outside of the aforementioned period, or through unauthorized channels, may be disregarded and shall not be subject to review or resolution. This provision shall survive the termination or expiration of the agreement.

For the purposes of this clause, "termination or expiration" of the agreement shall include, but is not limited to, the following scenarios:

- Reclassification of the account as Dormant;
- Issuance of a full refund to the Client;
- Proactive termination of the agreement, whether initiated by the Client or by the Company, at its sole discretion;
- Complete depletion of the account balance.

5. ESCALATION OF COMPLAINT

If complaints are sent to the any other Department, the complaint needs to be escalated to the Customer Support Department, which will in dependently and impartially investigate it.

Both the Customer Support Department and the Compliance Department shall thoroughly examine any complaints as required (taking into account any information contained within the books and records of the Company).

6. TIMELINE TO RESOLVE COMPLAINTS

The Company shall make every effort to investigate your complaint and provide you with the outcome of our investigation within not more than one month (30 days) from the date you have submitted your complaint to us. During the investigation process you will be kept updated of the handling process of your complaint. In case the Company are unable to respond you in this period of time, you will be informed for the reasons of the delay and the period of time when the investigation will be completed which will be no more than three months from the submission of the complaints.

7. RECORD KEEPING REQUIREMENTS

The Company is required to keep the complaints records for a duration of 7 years under the AML laws of Seychelles.

8. UNRESOLVED COMPLAINTS

If you believe that your complaint has not been handled in a fair and equitable manner by the Company you have the right to refer the matter to the authority being the Financial Service Authority (FSA).

If you wish to escalate your complaint you are advised to submit your complaint to the FSA complaints@fsaseychelles.sc with all relevant information/documentation and evidence of your complaint.

9. REVIEW AND TESTING OF THE COMPLAINT HANDLING POLICY

This policy will be reviewed and/or amended annually or as needed when considered necessary by the board of directors or when changes or amendments to operating requirements are imminent and it will be based on statistic compiled and received on complaints logged. All Records will be kept as prescribed by the law and same will be circulate to staff.

10. TRAINING

As part of Magnum core values is treating customer fairly and the Company expects this culture to be imposed in all of its employees to maintain a good market reputation. Thus the Company has a planned yearly training to refresh its staff; what is good market conduct, customer care and what benefit it bring for the business as a whole.

COMPLAINTS FORM

Ways of Communication: Fax / Telephone/ Email/ Letter

Client details:				
Name:		Surname:		
AccountNumber:				
Legal Entity Name (ifapplicable):				
Address:				
Post Code:		City:		Country:
Telephone Numbers:	Home:	Work:	Mobile:	Fax:
Email:				
Brief Summary of the complaint				
Please answer in details the questions below:				
<ul style="list-style-type: none"> • The affected transaction(s) numbers • The date and time of the disputed issue/trade: • a brief description of the issue 				
Please enclose any other relevant documentation that may enable us to handle and resolve the complaint.				
I hereby certify and confirm that to the best of my knowledge, the information furnished above is true, accurate, correct and complete.				
Signature:			Date:	

COMPLAINTS HANDLING POLICY MAGNUM INTERNATIONAL MARKETS LTD

For internal use only

Complaint received by:

.....

Date of reception:

...../...../.....

Reference

number:.....

.....

Date:...../...../.....

Department involved:

.....

Employee involved:

.....

Date:...../...../.....

Initial response to client:

___Yes, ___No

Initial Action Taken:

.....
.....
.....

Informed Client Of Initial Action taken:

___Yes, ___No

Date:...../...../.....

Further Action Taken: ___Yes, ___No

FurtherActionTaken:.....

.....
.....

File handed on to ComplianceOfficer:___Yes, ___No

Date:...../...../.....

Settlement of complaint: ___Yes, ___No

Date:...../...../.....

Summary of how the complaint was settled:

.....
.....

Signature of Responsible Officer:.....

Date:...../...../.....