

Complaint Handling Policy

TABLE OF ACRONYMS

CO	Compliance Officer
FSA	Seychelles Financial Services Authority

TABLE OF DEFINITIONS AND INTERPRETATIONS

“**Board**” means the Board of Directors of INGOT SC LTD;

“**Business Relationship**” shall have the meaning set out under Section 2 of the Anti-Money Act 2006;

“**Companies Act**” means the Companies Act 1972;

“**Company**” shall mean INGOT SC LTD which is formed and registered in the Republic of Seychelles under the Companies Act 1972;

“**Complaints**” mean (i) specific requests or claims related to the performance, services or products of the Company, which objects the performance or expresses negligence of the Company and lodges a relevant, specific and clear demand and/or (ii) 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;

“**Complainant**” includes 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;

“**Customer**” shall have the meaning set out under Section 2 of the Anti-Money Laundering Act 2006;

“**Employee**” means a person employed by INGOT SC LTD at non-executive level;

“**Person**” includes a natural person and a legal person;

“**Policy**” means INGOT SC LTD’s Complaint Handling Policy; “**Republic**” means the Republic of Seychelles;

Words importing one gender include all other genders and words importing the singular include the plural and vice versa.

1.0 INTRODUCTION

This Policy regulates effective, clear and fast handling of complaints submitted to the Company in



relation to the performance and procedures of the Company.

The Company maintains Records of Complaints and measures taken for expedient complaint resolution, in line with applicable Legislation, Rules and/or Regulations.

2.0 SUBMITTING A COMPLAINT

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.

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 the Company:

- i. By company website dedicated customers' area
- ii. Through the client's trading account internal mail using Metatrader 4 or 5
- iii. by mail;
- iv. by telephone;
- v. by e-mail;
- vi. in writing.

All complaints should be directed to the following persons:

Front Office:	
Name:	INGOT SC LTD
Email address:	Customerservice@ingotbrokers.com
Telephone Number:	002484345580

Compliance Officer:	
Name:	Hazel Rita Porice
Email address:	h.rita@ingotbrokers.com

Telephone Number:	002484345580
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Financial Services Authority (FSA):	
Name:	Financial Services Authority
Email address:	complaints@fsaseychelles.sc
Telephone Number:	+248 4 380 800
Formal letter addressed	The Chief Executive Officer CC. Policy (Information & Communication Unit)Financial Services Authority Bois De Rose Avenue P.O Box 991, VictoriaMahé, Seychelles
Link to complaint handling form	Complaint Handling (fsaseychelles.sc)

2.1 RESPONSIBILITIES OF FRONT OFFICE IN RECEIVING COMPLAINTS

Employees of the Customer Service shall receive and manage; first of all, complaints within the Company. Employees of the Customer Service 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 Customer Service of the Company. Contact of the Customer Service is available at the homepage of the website of the Company at all times. If employees at Customer Services are unable to settle the complaint efficiently or within 14 days, the Head of Dealing and Operations Department shall forward the complaint to the CO of the Company.

The telephone line of the Customer Service is available for submitting complaints by telephone. If the Complainant calls another telephone number of the Company to submit his complaint, he will be redirected to the Customer Service. If possible, the Company provides twenty-four (24) hours direct telephone line to the Customer Service.

If the Complainant wishes to submit the 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.

3.0 REGISTRATION OF COMPLAINTS

The Company, shall register all complaints until they are dealt with. This register shall record at least

the following information:

- i. the identity of the Customer who filed the complaint;
- ii. the identity of the employee who initially received the Customer complaint;
- iii. the department to which the relevant employee relates to;
- iv. the date of receipt of the complaint;
- v. the details of the complaint – full description;
- vi. the extent in financial terms of the potential loss that the Customer claims has suffered;
- vii. The date and in summary, the content of the reply of the Company to the said complaint.
- viii. The date and in summary, the content of the reply of the Company to the said 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 not be deleted from records nor made unsuitable for identification for a period of not less than seven years.

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

Unless settled on the spot, the Company records a written memorandum on all verbally 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 Customer Service and the Complainant and keeps the voice record for the period of seven (7) years. 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.

CLASSIFICATION OF COMPLAINTS

All complaints must be classified by and then analysed to identify systemic, recurring and single incident problems and trends.

Level 1 – the least serious complaints. The complaint could not be resolved at first contact with the client. The complaint can be resolved without escalating it to the Managing Director.

Level 2 – more serious complaints. The CO must be informed of the complaint and may provide input where necessary to help resolve the complaint.

Level 3 – the most serious complaints. This type of complaint will require the involvement of the Managing Director.

4.0 MANAGING COMPLAINTS

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

The Complaints are handled by:

A) Customer Service

If possible, all complaints must be settled without delay. If immediate settlement of a verbal complaint is not possible or the Complainants reject the solution offered on the spot, an employee of the Company shall record the complaints and the Company's position in a memorandum and forward them to Customer Service, unless the complaint was submitted directly to Customer Service. Similarly, Company employees forward all complaints submitted in writing to Customer Service. Customer Service shall be responsible for settling complaints. The officers of the Customer Support Department will inform the complainant of the appropriate process to follow.

If the complainants are contacting the company on behalf of another person, they may be asked to provide a proof of that person's consent to the complainants handling their Complaint. The company aims to respond to the matter within seven (7) business days depending on the nature of the complaint and ensure that the maximum time to resolve the complaints do not exceed thirty (30) business days.

B) Compliance Officer

If employees at Customer Services are unable to settle the complaint efficiently or within a short period of time, they will forward the complaint to the CO of the Company. The Complainant, if he does not accept the solution offered by Customer Service, is also entitled to approach the CO directly.

C) 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.

5.0 RESPONSE TO COMPLAINTS

The Company follows the outlined procedures to ensure that the complainant's complaint is resolved within a period of a maximum of thirty (30) business days. This response, including the reasoning, is always mailed 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, the company will communicate the reasons for the delay. Sometimes the complainant is requested to supply additional information required for investigating the complaint.

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.

6.0 MONITORING OF COMPLAINTS AND RECORD KEEPING

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

7.0 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 an appeal to the FSA of the case so that the required enforcement action may be taken.

