



ICLOUDFX

**COMPLAINTS
HANDLING
POLICY**



COMPLAINTS HANDLING POLICY

1. Introduction

This Complaints Handling Policy (the “Policy”) establishes procedures for IcloudFX Limited (“the Company”) to effectively manage and resolve complaints received from clients.

1.1. Control Objective

This Policy’s objective is to maintain the confidence of the company’s clients when they have a complaint and, therefore, minimize the potential risk of damage to our reputation and reduce the risk of litigation by handling complaints from our customers or prospects in a timely, effective and consistent manner.

1.2. Responsible Persons

The Compliance Officer of the Company is designated as responsible for complaints management function, namely the application of this policy, and to review this policy on a regular basis to ensure that it continues to comply with industry laws, regulations, guidelines and best practices and investigation. The Compliance Officer of the firm is also responsible to communicate this firm’s policy to all employees, officers, directors, representatives and advisors of the firm.

All complaints will be forwarded to the Compliance Officer, regardless of how they originate. The Fraud & Security Manager will screen all complaints and forwarded them to the relevant delegated person who will operate on behalf of the Compliance Officer and who are responsible for reporting any resultant action and the outcome to the Compliance Officer.

The Customer Service (CS) Manager is responsible for monitoring and reporting minor complaints to the Compliance Officer. The CS Manager shall maintain a record of all complaints that may be required to be produced at any time without notice. The record shall include information identifying the complainant, the reason for the complaint and the progress of the matter.

The Fraud & Security Manager is responsible for handling serious complaints, working together directly with the Compliance Officer.



2. Purpose

The purpose of our Complaints Handling Policy is to:

- Recognise, and protect customers' rights, including the right to comment and complain
- Provide an efficient, fair and accessible mechanism for resolving customer's complaints;
- Provide information to customers on the complaints handling process

3. Definitions

Complaint means 'a genuine expression of dissatisfaction or concern regarding the Company's services, or the complaints handling process itself.' A complaint may be made by, fax, email, in writing and via the Company's website. Verbal complaints should be documented immediately by the employee who receives the complaint.

'Complainant' means the person or organization making the complaint.

'Client' or 'Customer' means a person or organization receiving a service, or engaged in a business relationship.

Dispute means a customer's formal disagreement with the products and services of the Company which leads to some type of internal or external review or determination.

4. Commitment

We are committed to efficient and effective complaints management. Our commitment involves:

- encouraging an organizational culture that welcomes complaints as an opportunity to improve services
- the development and maintenance of a computerized Complaints System to manage complaints;
- the adoption and dissemination of this policy Easy Forex Group Complaints Handling Policy'; and
- Reporting information about complaints management in executive and Board reports.



5. Fairness

We recognise the need to be fair to both the complainant, the Company and employee against whom a complaint may be made.

If a customer complains, we will:

- treat the complainant with tact, courtesy and fairness at all times;
- maintain appropriate confidentiality of the complaint at all times;
- not victimize or harass the complainant as a result of any complaint he/she makes against us;

6. Resources

We have resources committed to the handling of complaints by way of a customized, computerized Complaints Log System that is available only to the Compliance Officer and Customer Service Support for handling and monitoring the complaints.

7. Visibility of the complaints process

We promote the existence of our Complaints Handling Policy through:

- A direct link to 'Complaints' on the Contact Us Page of the Company's website
- and the Legal Page on the website.

8. Procedure

8.1. Filing Complaints

The clients willing to submit a complaint are advised to complete a Complaint Form and to send it to the Company through the following options:

- To send an email with a brief explanation of the subject of complaint at complaints@icloudfx.com
- To send by post a complaint at: Lietuva Corporate Headquarters Saltoniškių g.7 08100 Vilnius – Lietuva
- To send by fax a complaint at: +357 25 25817183



8.2. How your complaint will be handled

- Upon receipt of a client complaint, the Company will register the complaint directly to our Complaints Log System, giving it a unique reference number. The unique reference number will be communicated to the complainant on our initial response letter to the within a reasonable time, and generally within 5 business days of receipt of the complaint. The unique reference number should be used in all future contact with our Company, the Financial Ombudsman and/or the FSCR regarding the specific complaint.
- We shall then thoroughly examine all complaints, our procedures for handling complaints are ruled to be fair and unbiased. We will then review the complaint and determine whether there is enough sufficient information to proceed with resolving it. We may ask you for further information or clarification.
- We aim to resolve any complaint within two weeks from the date on which we received your complaint. This may not always be possible, as sometimes the

complexity of the complaint may require more time to investigate fully. If we are unable to resolve your complaint within two weeks of receipt, we will contact you to explain why we are not in a position to resolve your complaint and give you an indication of when we will make further contact.

- In the unlikely event that your complaint has not been resolved within two months of original receipt, we will send you a letter explaining why we have still not resolved your complaint and provide you with an expected finalization timeframe.
- Our final response will advise of our findings and, where appropriate, what action is being taken to resolve the matter. We will address the subject matter of your complaint, and where the complaint is upheld, we will offer a resolution that is consistent with treating all of our customers fairly.
- If you telephone us during our investigation and the member of staff handling your complaint is not available, then another member of our team will be able to help you.

8.3. Appealing a decision - external review

When providing a final decision that does not fully satisfy the complainant's demands, we will notify the complainant in writing with a thorough explanation of our position on the complaint and set out the complainant's option to maintain the complaint e.g through the Commission or the relevant Courts.



9. Charges

Complainants shall be able to file complaints and receive the above procedures for complaints free of charge.

10. Employee training and counseling

Where a complaint is made about an employee, whether it is about the employee's general manner or about the employee providing wrong information, and after investigation if we consider the complaint is justified, the employee will be provided with training and/or counselling.

11. Information of the relevant authorities

11.1. Cyprus Securities and Exchanges Commission

- Website: <https://www.FSCR.com/>
- Telephone Number: +32 2 588 70 00
- Address: Rue de la Loi/ Wetstraat 223
- 1040 Bruxelles Belgium

11.2. Financial Ombudsman Cyprus

- Website: www.financialombudsman.gov.cy
- Telephone Number: +357 22848900
- Address: Kypranoros 15, 1061 Nicosia, P.C. 257351311

12. Storage of complaint records

The Company shall maintain all complaints or grievances for a minimum period of five years. Records of all complaints will be retained in our Complaints Log System, for confidentiality, monitoring and evaluation purposes. Access to the complaints records will be restricted to authorized staff only.

13. Review

The Complaints Handling Policy will be reviewed at regular intervals to ensure it meets the needs of the Company and its customers by the Compliance Officer and will be approved by the Board of Directors of the Company.



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