

AC Capital Market Complaint Handling Policy

**AC Capital Market (S) Ltd
(the “Company”)**
Securities Dealer licence no: SD198

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1. 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 Laws, Rules and/or Regulations.

2. QUERIES, COMPLAINTS AND DISPUTES

2.1 Definitions

- a. Complaint:
 - i. Complaints are defined as 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.
 - 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.
- b. Complainant
 - i. 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.
 - ii. 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.

2.2 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 live chat access,
- by mail,
- by telephone,
- by e-mail,
- in writing, or
- verbally, both delivered personally

Complaints should be addressed to the following:

- i. Front Office

Name:	Customer Service ("CS")
Email ID:	cs@accapital-syc.com

ii. Compliance

Name:	Compliance Officer ("CO")
Email ID:	compliance@accapital.com

iii. Financial Services Authority

Name:	Financial Services Authority in Seychelles ("FSA") Complaint Handling (fsaseychelles.sc)
Email ID:	complaints@fsaseychelles.sc
Contact Number:	+248 4 380 800
Address	The Chief Executive Officer CC. Policy (Information & Communication Unit) Financial Services Authority Bois De Rose Avenue P.O Box 991, Victoria Mahé, Seychelles

Front Office Responsibilities:

The CS team shall receive and manage - first of all - complaints within the Company. The CS team 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 CS team of the Company. Updated contact of the CS team is available at the homepage of the Company all the time.

The live chat access on the Company's website provides Complainant 24 hours direct access to the CS team. If the CS team is unable to settle the complaint efficiently or within 48 hours, they will forward the complaint to the Company's CO.

If you wish to submit your complaint personally, you can visit the office of the Company during office hours (9:00 -16:00 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.

2.3 Registration of Complaints

The Company, until dealt with, shall register all complaints. This register shall record at least the following information:

- description of the complaint,

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- 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.

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 live chat conversations between the CS team and the Complainant and keeps the record for the period of one year. The Complainant shall be informed about this at the beginning of the conversation.

2.4 Managing Complaints

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

Responsible for Handling Complaints:

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 rejects the solution offered on the spot, the CS team of the Company shall record the complaints and the Company's position in a memorandum and forwards them to the CO, unless the complaint was submitted directly to the CO. Similarly, the Company employees will forward all complaints submitted in writing to the CO.

The CS team shall be responsible for settling complaints. The officers of the CS team will inform you of the appropriate process to follow.

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 thirty (30) days.

b. Compliance Officer

If the CS team is 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/she does not accept the solution offered by the CS team, 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 CO of the Company.

The employee of the Company who participated in the measure related to the complaint or made a decision that is 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.

3. 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 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, 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 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 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.

4. MONITORING OF COMPLAINTS

After settling the procedure, the Company shall preserve every written or electronic document 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 at improving the efficiency of administering complaints.

5. 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 at the Financial Services Authority Seychelles ("FSA"). FSA will then evaluate the complaints received and will review the case and will make the necessary arrangements for resolving the complaint.

6. RECORDS

Copies of all written communications sent to a complainant in relation to the complaint shall also be provided to the CO who will note his record accordingly. A file will be opened for each client in relation to any complaints.

The CO shall also be notified of complaints which have been settled and the terms on which settlement has been achieved. For this purpose a complaint is deemed to be settled when a full reply has been sent to the complainant and no response has been received after a period of four weeks has elapsed from the date on which the reply was dispatched, or if the complainant has confirmed that they are satisfied with the settlement and consider the complaint to be rectified.

The record of complaints will be maintained by the CO for a minimum period of 7 Years prior to archiving or destruction in accordance with the Company's policy.