

KQ Markets Europe Ltd Complaint Management Policy

1. Purpose

KQ Markets Europe Ltd is a limited company by shares incorporated and registered under the laws of the Republic of Cyprus under registration number HE 427857. KQ Markets Europe Ltd is a tied agent of StoneX Europe Ltd and acts under the full and unconditional responsibility of StoneX Europe Ltd, on whose behalf it promotes investment and/or ancillary services, attracts clients or prospective clients and transmits clients orders in relation to one or more financial instruments. StoneX Europe Ltd (the 'Company' or 'we' or 'us') is a Cyprus investment Firm licensed and regulated by the Cyprus Securities and Exchange Commission. The Company has adopted this Clients' Complaints Management Policy (the 'CCMP' or the 'Policy') which set out the procedures to be followed, whenever a client files a complaint against the Company regarding all aspects of its activities and services. The CCMP provides a clear, accurate and up-to-date information about the complaints handling process.

The Company has adopted this Complaints Policy specifically designed for Clients to ensure a fair and quick process for handling Client Complaints that may arise from the Company's relationship with Clients. The Company must deal with any expression of dissatisfaction about any financial services activity provided or withheld by the Company in accordance with this Policy.

For your benefit and protection, you should take sufficient time to carefully read this policy as well as any other additional documentation and information available to you via the Company's website and client portal prior opening a trading account and/or engaging to any trading activities with the Company.

The Company will deal with your complaint or enquiries in a prompt, fair and efficient manner. The Company will follow the procedure outlined hereunder to ensure that your complaint or enquiry is resolved within reasonable time frames.

2. Definitions

- 2.1. A 'complaint' is a statement of dissatisfaction addressed to the Company by a natural or legal person relating to an investment service provided by the Company.
- 2.2. A complainant is any person, natural or legal person who is presumed to be eligible to have a complaint considered by a firm and who has already lodged a complaint.
- 2.3. In case the Company receives a notice through the line of communication established by the Company to receive complaints, but which does not fall within the definition of 'complaint' above and can be characterized as an enquiry; this shall be categorized as an enquiry rather than a complaint and will be forwarded to the relevant department to be handled accordingly. The complainant maintains the right to request for the reclassification of his enquiry as a complaint.

3. Correspondence

- 3.1. You may submit your complaint in writing and addressed it to the Company completing the relevant Complaint form as indicated in the Section further below and submit it electronically via the communication means as stated here below along with any relevant attachments.

Contact the Client Management Team on +35722090062 or email the company at eucomplaints@forex.com or send a copy of the complaint, filling out and sending the 'Complaint Form' (**Appendix A**) to the:

Client Management Team at Hadjikyriakion Building 1, 121 Prodromou Avenue, 2064 Strovolos 1st Floor, Nicosia, Cyprus

- 3.2. Complaints communicated to the Company, via the communications means as stated above, must be received from the registered email of the Client or the Client's appointed representative as soon as possible after the subject matter of the complaint arose. We aim to provide a high standard of service to all our clients on every occasion.

4. Complaints Handling Procedure

- 4.1. Upon the receipt of your official complaint, a written acknowledgment should be sent to you within five (5) days confirming the receipt of your complaint and the estimated time under which the client shall be given a reply and providing a unique reference number for the specific complaint. The unique reference number shall be used in all future correspondence with the Company and with the relevant competent authorities (CySEC and Financial Ombudsman – as the case may be).
- 4.2. It is to be noted that Clients can submit complaints to the Company, free of charge. When handling a complaint, this should be communicated to the client clearly, in plain language that is easy to understand, and the Company shall reply to the complaint without undue delay.
- 4.3. The Company usually aim to resolve issues within 3 business days following receipt of the complaint. However, in order to help us investigate and resolve the client's complaint as quickly as possible and with minimum inconvenience to the client, the following information is requested and submitted via the communications means as stated above, otherwise please proceed with the submission of Appendix A:
 - The Client's name, address and client reference number;
 - A clear description of the complaint;
 - Details of client's expectations on our actions to do to put things right;
 - Copies of any relevant documents, such as letters; and
 - A daytime telephone number where we can contact the client
- 4.4. If the Client Management Team are unable to resolve the matter with the client to the Client's satisfaction, the complaint must be referred to the Compliance Department who will:
 - Send the client a prompt written acknowledgement of receipt; and
 - Issue a final response within eight weeks of the complaint logged date setting out the Firm's view and the client's options.
- 4.5. The Company's officers shall analyze complaints and complaints-handling data to ensure that they identify and address any risks or issues.
- 4.6. The Firm has established a Complaints Committee, that is also responsible for reviewing the Complaints handling process, advising the Board of Directors the necessary amendments to the Complaints management policy, reviewing the complaints and ensures that complaints are investigated fairly, and possible conflicts of interest are identified and mitigated.
- 4.7. In case that the Firm is not able to respond within two (2) months, we should immediately inform the complainant about the reasons of the delay and indicate where the Company believes will be in a position to provide an outcome/decision. This time period cannot exceed three (3) months from the period of submission of

the complaint.

- 4.8. Please note that the Company shall consider the complaint as closed when a period of three (3) months has elapsed from the date of submission of the complaint and the client has failed to respond to the Company's officers' requests and due to this the investigation cannot be carried forward.
- 4.9. Upon the Company sends the final response to the Client, the client shall be given a period of two (2) months to respond. If a response is not received within the timeframe as indicated above, then the Company shall not be obliged to take the complaint further, unless further correspondence is received from the client indicating that (s)he is still dissatisfied with the Company's final response.
- 4.10. If the Client is not satisfied with the outcome of the complaint, can request a review from the Financial Ombudsman Service. The Financial Ombudsman Service has been established to review eligible complaints which the Company are unable to resolve.
- 4.11. In the Firm's final response, the Company will confirm the eligibility of the client to refer the complaint to the Financial Ombudsman Service.

The Financial Ombudsman Service's contact details are outlined below:

The Financial Ombudsman Service

Website: <http://www.financialombudsman.gov.cy>

Email: complaints@financialombudsman.gov.cy

By hand or by post to the address: 15 Kypranoros, 1061 Nicosia or P.O.

Box. 26722, 1647 Nicosia

Telephone: +35722848900

Fax: +35722660584, +35722660118

- 4.12. It is understood that Clients' right to take legal action remains unaffected by the existence of use of any complaint's procedures referred to above. In addition, Clients have the right to address their complaints to the Financial Ombudsman of Cyprus (as stated above), provided that each complaint does not exceed the amount of one hundred and seventy thousand-euro (170,000), within four (4) months after the Company provides its final response.
- 4.13. The Firm will analyse, on an on-going basis, complaints handling data, to ensure that they identify and address any recurring or systemic problems, and potential legal and operational risks, for example by:
 - Analyzing the causes of individual complaints to identify root causes common to types of complaints,
 - Considering whether such root causes also affect other processes or financial means, including those not directly complained of; and
 - Correcting, where reasonable to do so, such root causes.

- 4.14. Client may refer their complaints to CySEC, using the unique reference number provided by the Company during the initiation of the complaints' procedure. It is to be noted that CySEC does not have restitution powers and therefore does not investigate individual complaints.

5. Record Keeping

- 5.1. All decisions related to complaints shall be communicated to complainants in writing and copies shall be retained by the Company.
- 5.2. All the documentation related to complaints shall be maintained for a period of at least five (5) years calculated after the execution of the complaint and/or termination of the business relationship with the Client.

6. Appendix A

Complaint Form	
<p>Complete, up to date as well as accurate information is required to be provided to StoneX Europe Ltd, for the proper investigation and evaluation of your complaint. Please note that the below Complaint Form is only indicative and not exhaustive.</p> <p>StoneX Europe Ltd may request further information and/or clarifications and/or evidence as regards your complaint. Moreover, StoneX Europe Ltd may request from you to re-submit a new Complaint Form in case it considers that you have incorrectly and/or falsely completed your Complaint Form. StoneX Europe Ltd will try to resolve your complaint on the basis of good faith, fairness and by taking such action as is consistent with market practice.</p>	
Client Details	
1.	Title: <input type="text"/>
2.	First Name: <input type="text"/>
3.	Last Name: <input type="text"/>
4.	ID or Passport Number: <input type="text"/>
5.	Nationality: <input type="text"/>
6.	Mobile Phone Number (include the country code): <input type="text"/>
7.	Work phone number: <input type="text"/>
8.	Email address: <input type="text"/>
9.	Residential Address (Address/City/State-Province/ ZIP code/ Country): <input type="text"/>
Complaint Details	
10.	Trading Account Number(s): <input type="text"/>
11.	Please provide a Summary of your complaint in the space provided below. Please try to justify the disputed amount and/or to include details that will facilitate the Company in investigating your complaint. Please use a separate sheet if necessary.

12.	When did the issue are you complaining about take place (DD/MM/YYYY)?	
13.	When did you first notice that there might be a problem (DD/MM/YYYY)?	
14.	Have you communicated your complaint previously to StoneX Europe Ltd and/or its associates (Yes/No)?	
15.	If your answer to question 14 above is YES, then please state the date you first informed StoneX Europe Ltd and/or its associates of your complaint and the name of the person you discussed your complaint with:	
15.1	Please enter the date (DD/MM/YYYY)	

15.2	StoneX Europe Ltd Representative's Name and email address	
15.3	Method of Communication.	
15.4	Have you reported your complaint to any authority (YES/NO)?	
15.5	Please complete if your answer to point 15.4 is 'Yes' – please state which financial authority have you contacted.	
16.	Please attach with this form any supporting evidence to your claim that will facilitate the Company's investigation of your complaint. Supporting evidence may consist of any documentation (screenshots, chats, phone records etc) relevant to the complaint.	
17.	I hereby certify and confirm that to the best of my knowledge, the information furnished above is true, accurate, correct and complete (please tick the box). <input type="checkbox"/>	
Signature.....		
Date.....		
FOR OFFICIAL USE ONLY		
18.	Received on:	
19.	Received by:	
20.	Assigned to:	
21.	To reply by:	