

## HF Markets (SV) Ltd

# COMPLAINTS HANDLING POLICY

## Table of Contents

1.	Introduction .....	3
2.	Interpretation of Terms.....	3
3.	Scope of the Policy.....	3
4.	Definition of a Complaint .....	4
5.	Procedure.....	4
6.	Principles of the Policy .....	5
7.	Client’s rights.....	5
8.	General Conditions .....	6
9.	Record Keeping.....	6

## **1. Introduction**

- 1.1. **HF Markets (SV) Ltd** (hereinafter referred to as the “**Company**”), is incorporated under the laws of Saint Vincent and the Grenadines with Registration 22747 IBC 2015 having its registered office at Suite 305, Griffith Corporate Centre, P.O. Box 1510, Beachmont, Kingstown, Saint Vincent and the Grenadines. The Company is authorised as an International Business Company under the International Business Companies (Amendment and Consolidation) Act, Chapter 149 of the Revised Laws of Saint Vincent and Grenadines, 2009 (herein the “**Law**”).
- 1.2. The objects of the Company are all subject matters not forbidden by International Business Companies (Amendment and Consolidation) Act, Chapter 149 of the Revised Laws of Saint Vincent and the Grenadines, 2009, in particular but not exclusively all commercial, financial, lending, borrowing, trading, service activities and the participation in other enterprises as well as to provide brokerage, training and managed account services in currencies, commodities, indexes, CFDs and leveraged financial instruments.
- 1.3. The Company has implemented and maintains a Complaints Handling Policy (the “**Policy**”), which is described in this document.

## **2. Interpretation of Terms**

- 2.1. Unless the context requires otherwise, all terms included in this Policy shall have the meaning given to them herein. Where the context requires, (a) words importing the singular shall include the plural and vice versa and (b) words importing the masculine shall include the feminine and vice versa.

## **3. Scope of the Policy**

- 3.1. The purpose of the Policy is to set out the internal complaint resolution system and procedures which the Company has established, maintains and follows for the resolution of complaints.

#### **4. Definition of a Complaint**

- 4.1. A complaint is an expression of dissatisfaction by a client regarding the provision of investment and/ or ancillary services provided to him by the Company. Complainant is the person, natural or legal, which is eligible for lodging a complaint to the Company and who has already lodged a complaint.
- 4.2. A complaint received by a client (herein “the **Client**”) shall include:
  - (a) the Client’s name and surname;
  - (b) the Client’s trading account ID;
  - (c) the affected transaction number(s), if applicable;
  - (d) the date(s) that the alleged issue arose and a detailed description of the alleged issue;
  - (e) any tangible evidence: emails, documents and/or relevant material.
- 4.3. A complaint must not include offensive language directed either to the Company or a Company employee.

#### **5. Procedure**

- 5.1. All complaints must be in writing and shall be addressed to the Company’s dedicated email address for proper handling. A Client who wishes to proceed with filing a complaint is requested to address it to: [complaints@hfm.com](mailto:complaints@hfm.com).
- 5.2. Upon receiving the complaint, the Company shall promptly acknowledge its receipt and notify the Client via email.
- 5.3. Within five (5) working days of receiving the complaint, the Company will provide the Client with a unique reference number to be used in all future correspondence related to this specific matter. In the same communication, the Company will confirm that the complaint is being examined and inform the Client that an official response will be provided once the internal investigation has been completed.
- 5.4. The Company shall thoroughly examine all complaints as required (taking into account any information contained within the books and records of the Company, including but not limited to the Client’s trading account history) without undue delay.

- 5.5. The Company will not be able to handle or investigate a complaint, if the requirements included in paragraphs 4.2 and 4.3 above are not fulfilled. In such an event the Company shall revert back to the Client and request him to send any additional information. In any event, one of the Company's officers may contact the Client directly in order to obtain further clarifications and information relating to his complaint. The Company shall need the Client's cooperation in order to handle the complaint.
- 5.6. Upon completion of the investigation, the Company shall send its initial response to the Client within fifteen (15) business days from the date of the receipt of the complaint.
- 5.7. If the complaint requires further investigation and cannot be resolved within fifteen (15) business days, the Company will issue a holding response outlining the reasons why the matter has not yet been concluded and indicating when further communication can be expected. In such cases, a final response will be provided within thirty (30) business days of receiving the complaint.
- 5.8. If the Company does not manage to conclude its investigation and/or respond to the complainant within thirty (30) business days from the date of receipt of the complaint, the Company shall send a written notice explaining the reasons for not reaching a decision and/or concluding the investigation yet, the reasons for the delay as well as indicate the period of time within it shall be able to complete the investigation. It is noted that the Company shall not provide its response later than two (2) months from the date of the submission of the complaint.

## **6. Principles of the Policy**

- 6.1. All complaints shall be treated confidentially.
- 6.2. The Company shall deal with Client's complaints without undue delay.
- 6.3. The company will resolve all complaints in a fair manner.

## **7. Client's rights**

- 7.1. While the Company encourages clients to resolve any concerns directly through its comprehensive internal complaint handling process, clients retain the right to seek

alternative dispute resolution or legal remedies independently if they remain dissatisfied with the outcome.

## **8. General Conditions**

- 8.1. A complaint will be considered closed if four (4) weeks have passed since its submission and the Client has not responded to the Company's investigating officer's requests, preventing further investigation.
- 8.2. Only the account holder may lodge a complaint related to his trading account. The Company may, however, accept complaints from third parties (such as legal representatives) acting on behalf of the Client, provided that the Client has granted written authorization, which must be presented as evidence to the Company.
- 8.3. Clients' complaints will be addressed, *inter alia*, as per the provisions of the Company's legal documentation that the Client had to read, agree and accept prior to establishing a business relationship with the Company.

## **9. Record Keeping**

- 9.1. The Company has established, maintains and updates the complaints register with details of all the complaints received per month for a period of five (5) years. The following information is recorded in the complaints register:
  - (a) Unique Reference Number
  - (b) Date of the complaint;
  - (c) Client's full name;
  - (d) Client's trading account ID;
  - (e) Client's country of residence;
  - (f) Disputed amount;
  - (g) Complaint cause;
  - (h) any comments thereof.

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