



STARTRADER LIMITED
(FORMERLY IV Markets Limited)

Complaint Handling Policy

Document Updating Record

Date	Document	Amendments and insertions
May/2020	Original Document	
September/2022	Version 2022	<ol style="list-style-type: none"> 1. Change the Company Name as approved by FSA, to STARTRADER LIMITED 2. Change the email address for submitting the complaints to support@startrader.com 3. Change the telephone number for submitting the complaints to +886 933279445 4. Remove the contact person for complaints

Document Approval

Document Name	Complaint Handling Policy (Version 2022)
Prepared by	The Senior Management – Compliance Team
Approved by	Mr. Peter Karsten
Position	Director
Signature	
Date	20 th September 2022

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 Laws, Rules and/or Regulations.

1.1. 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.

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:

i. by mail,

- I. Postal Address: IV Markets Limited
Block B, Room 2, No 2
Global Village
Jivan's Complex
Mont Fleuri
Mahe,
Seychelles

II. Postal Address: Financial Services Authority
PO.Box 991
Bois de Rose Avenue
Roche Caiman
Mahe,
Seychelles
Phone: (+248) 438 08 88
Fax: (+248) 438 08 88
Email Address: complaints@fsaseychelles.sc

ii. by e-mail,

All complaints should be directed to:

Email address: support@startrader.com
Telephone Number: +886 933279445

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 in the Contact Us in the app from 5:00 to 18:00 (GMT+4, Seychelles time). If employees at Customer Services are unable to settle the complaint efficiently or within 48 hours (2 business day), they forward the complaint to the Compliance officer of the Company.

If the Complainant calls the telephone number of the Company to submit his/her complaint, he/she will be redirected to the Customer Service and is required to submit a written request. If you wish to submit your complaint personally, you can visit the head office of the Company in office hours (8:00 -17:00 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.

1.2. Registration of Complaints

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

- i description of the complaint,
- ii description of the event or fact subject of the complaint,
- iii date of submitting the complaint,
- iv measures implemented to settle or solve the complaint,
- v in case of rejection, the reasoning of the rejection,
- vi deadline of managing the complaint,
- vii name of the person responsible for the execution,
- viii 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 written submitted complaints. For this purpose, the Company is entitled to use a complaint format or to register the complaint electronically.

The Company records all telephone conversations between the Customer Service and the Complainant and keeps the voice record for the period of one year. 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.

1.3. 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 rejects 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 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 fourteen (14) business days depending on the nature of the complaint and ensure that the maximum time to respond to complaints do not exceed 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 forward the complaint to the Compliance officer of the Company. The Complainant, if he/she does not accept the solution offered by Customer Service, is also entitled to approach the Compliance officer 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.

1.4. 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 a correct, clear and unanimous reasoning to every decision brought down in order to settle complaints, which are emailed 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.

1.5. 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 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.

1.6. 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 Financial Services Authority ("FSA") through. FSA will evaluate the complaints received and will review the case and will make the necessary arrangements for resolving the complaint.