



COMPLAINT HANDLING AND PROCESSING POLICY

Complaint handling and Processing Policy

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ATG is committed to providing every individual or legal entity that has an active trading or investment account with the Firm (hereinafter referred to as the “**Client**”) with the best customer service experience. However, the Clients are aware of the Firm’s Risk Disclosure Policy, and they acknowledge, recognize and understand that trading and investing in leveraged and non-leveraged products may come with a high risk of losing money.

ATG strongly advises its Clients to consider seeking professional advice before opening an account, as online trading carries the potential risk of financial losses.

This complaint handling and processing policy (hereinafter referred to as the “**Policy**”) will serve as an outline for the procedures and guidelines for effectively managing and resolving the Complaints from previous and current Clients of the Firm.

The Firm’s Compliance Officer will oversee the implementation of the Policy and will endeavor to resolve all Complaints within a convenient timeframe.

In the event of any inconsistency between versions of all terms and conditions, the English version shall prevail.

1. Complaint Types

- 1.1. A “**Complaint**” is an expression of discontent, whether conveyed verbally or in written form, and whether justified or not and submitted by either a previous or current Client (hereinafter referred to as the “**Complainant**” in subsequent sections) and pertains to ATG’s delivery or failure to provide a financial service, which has resulted in or has the potential to result in financial loss, significant distress, or considerable inconvenience for the Complainant.
- 1.2. The above definition should be interpreted in its broadest terms and the Complaint includes but is not limited to:
 - Misleading Information
 - Poor administration
 - Breach of applicable laws and regulations
 - Incorrect calculation of fees and equity
 - Platform Reliability
 - Account Management
 - Trades’ execution delays
 - Account Closure
- 1.3. It is imperative to take every Complaint seriously, irrespective of how minor it may appear to the Firm’s employees (hereinafter referred to as the “**Staff**”) who receive them.

2. Complaint Submission

- 2.1. All Complaints could be addressed by hand (in writing) to the address mentioned in section 7 of this Policy, or via email at compliance.intl@atfx.com or via telephone on +230 467 2000.
- 2.2. The Staff will provide the Complainant automatically with a copy of the "Policy".
- 2.3. The Complaint should include as much information and details as possible to help the Compliance Officer investigate and resolve the Complaint as appropriately as possible, including but not limited to:
 - The Complainant's ATG account number;
 - The Complainant's name and surname;
 - A description of the problem;
 - The date and time that the issue arose;
 - Any other supporting materials for the Complaint.
- 2.4. The Staff will adhere to the following protocol when addressing Complaints, prior to forwarding them to the Compliance Chief Officer:
 - Record the Complaint details and reassure the Complainant within 48 hours of receiving such Complaint of the Firm's dedication to promptly resolving the issue.
 - Forward the Complaint details to the Compliance Department, which will then conduct an analysis and provide the Staff with their findings.
 - Communicate with the Complainant, within 7 days of receiving the Complaint either to address the issue (following consultation with the Compliance Department) or to provide an estimated timeframe for resolving the Complaint within a maximum of 30 working days.
 - Conduct a detailed and complete report on the Complaint, utilizing all the information provided by the Complainant during the submission of his Complaint, in conjunction with any additional data accessible to the Compliance Officer.

3. Investigation

- 3.1. The Compliance Chief Officer will ensure that the Complaint is dealt with in an appropriate manner. He will conduct a comprehensive evaluation of the Complaint, including a thorough analysis of the issue, and collaborate with other relevant departments within the Firm when necessary.
- 3.2. After receiving the Complaint details from the Staff, the Compliance Chief Officer will follow the following steps:
 - Log the Complaint into the Firm's complaints register (hereinafter referred to as the "**Register**") (**Appendix 1**)
 - Report the Complaint to the Country Manager
 - Decide, with the engagement of the Country Manager, the course of actions necessary to resolve the Complaint and record these actions into the Register
 - Assign the agreed actions to the appropriate department in the Firm
 - Set the dates necessary to complete the actions and achieve the agreed timeframes to complete the investigation (hereinafter referred to as the "**Investigation**") within 30 working days.
 - Keep the Complainant informed of the progress of the Investigation.

- In rare circumstances, when the Investigation cannot be concluded within the initial 30 working days, the Compliance Officer will issue a formal apology letter to the Complainant. This letter will provide a detailed explanation for the delay and request an extension of time, not to exceed an additional 30 working days.
- After the conclusion of the investigation, a comprehensive written response will be provided and sent by email to the Complainant which will explain the outcome of the investigation (hereinafter referred to as the “**Outcome**”).

3.3. The Outcome will aim to:

- Accept the Complaint, accompanied by suitable redress or remedial measures;
- Give effect to any offer of redress accepted by the Complainant
- Rejection of the Complaint, with transparent justification for the grounds of such dismissal.
- If the Complaint involves serious violations of laws or regulations, the Compliance Officer may involve legal authorities or regulatory agencies to resolve the issue.

4. Closing Complaints

4.1. A Complaint is considered as closed in the following circumstances:

- Once the Compliance Officer provide a final response to the Complainant
- Where the Complainant has indicated in writing his acceptance of the Outcome

4.2. When resolved/closed, the Compliance Officer will confirm that the Complaint has been resolved/closed and the appropriate procedures have been followed and finalize the entry of the details in the Register.

5. Monitoring the Complaints

5.1. The Compliance Officer will manage all Complaints and Complainants equally, without any discrimination, in harmony with the procedure regulated by this Policy.

5.2. All Complaints shall be treated confidentially.

5.3. Records of Complaints are securely retained for a duration of seven years from the date of their receipt.

5.4. The Compliance Officer shall be entitled to prepare statistics and reports about Complaints (hereinafter referred to as the “**Complaints Report**”), which will be aimed at improving the efficiency of administering Complaints. (**Appendix 2**)

5.5. The Complaints Report shall form an integral component of the annual report (hereinafter referred to as the “**Annual Compliance Report**”) prepared by the Compliance Officer and presented to the Board of the Firm.

6. Conflicts of Interest

6.1. ATG must verify that the Staff, who has received the Complaint, had no prior involvement in the management or provision of the financial services related to the subject of the Complaint.

6.2. It is imperative to confirm that the Staff possesses the requisite competence to address the Complaint in a fair, impartial, and proficient manner.

7. Contact Details

7.1. The contact details to where the Complaints should be directed are:

- In writing (by hand):
- G08, Ground Floor, The Catalyst, Silicon Avenue, 40 Cybercity, 72201 Ebène, Republic of Mauritius.
- By telephone: +230 467 2000
- By e-mail: compliance.intl@atfx.com

Appendix 1 – Complaints Register

<u>SL No.</u>	<u>Date Registered</u>	<u>Phone / Email / Other</u>	<u>Name of Client / Business Partner</u>	<u>Final Action Date</u>	<u>Business Area</u>	<u>Resolution Details</u>	<u>External Action</u>	<u>Status</u>

Appendix 2 – Complaints Report

Number of Complaints for Period _____

Closed Cases _____

Outstanding Cases _____

Business Area(s) Impacted _____

Regulators Contacts: Yes / No

Key Details of Cases:

Compliance Officer _____