

COMPLAINTS HANDLING POLICY

1. INTRODUCTION

1.1. JFD Overseas Ltd (herein "the Company") is incorporated in the Republic of Vanuatu. The Company is authorized and regulated by the Vanuatu Financial Services Commission ('VFSC'). VFSC number is 17933. Its registered office and Headquarters are at I Count Building, 1st floor, PO Box 211, Kumul Highway, Port Vila, Vanuatu.

1.2. This Complaints Handling Policy (herein "the Policy") is intended to ensure that the Company handle complaints fairly, efficiently and effectively.

1.3. This policy provides guidance to the Company's clients who wish to make a complaint on the key principles and concepts of our complaint management system. JFD Overseas maintains effective and transparent procedures for the reasonable and prompt handling of complaints or grievances received from clients and keeps a record of each complaint or grievance and the measures taken for the complaint's resolution.

2. GENERAL

2.1. JFD Overseas maintains effective and transparent procedures for the reasonable and prompt handling of complaints or grievances received from clients and keeps a record of each complaint or grievance and the measures taken for the complaint's resolution.

2.2. For the purposes of this Policy:

- «complainant» means any person, natural or legal, which is eligible for lodging a complaint to the Company and who has already lodged a complaint.
- «complaint» means a statement of dissatisfaction addressed to the Company by a complainant relating to the provision of investment services.

3. COMPLAINTS AND DISPUTES

3.1. In the event that an alleged breach, argument, claim, dispute or difference ("a Dispute") arises between the client and the Company out of or in connection with the terms applicable between the Company and the client (including but not limited to the validity, performance, breach or termination thereof), the parties shall seek to resolve the matter by negotiation by referring the matter first to:

- in case of legal persons to any member of your executive management or you personally if you are acting as a natural person;
- in the case of the Company to the Company's Customer Support Department.

3.2. The complaints must be submitted to the Company by email to the following address: support@jfdbrokers.com.

3.3. When a client wishes to submit a complaint, the below information needs to be included:

- name and surname;
- e-mail address (or other recognition details);
- detailed enquiry description;
- the date and time that the issue arose;

3.4. Clients' complaints or grievances are initially handled by the Customer Support Department. However, the final settlement of complaints or grievances is approved by the Compliance Department.

3.5. Upon receiving a complaint, the Company registers the complaint directly to an internal register, giving it a unique reference number.

4. HANDLING PROCEDURE

4.1. The procedure which is followed by the Company, when handling clients' complaints or grievances, is the following:

4.1.1. A complaint is initially handled by a member of the Customer Support Department. The employee receiving the complaint confirms within 5 days the receiving of the complaint to the complainant, so that the complainant is aware that his complaint is currently under investigation and communicates to the complainant the unique reference number of his complaint to use for all future contact with the Company or any relevant authority.

4.1.2. Furthermore, the employee takes all the necessary actions and addresses the complaint with its unique reference number to the relevant Department where the complaint is addressed. The Customer Support Department with the relevant Department should make all best efforts to ensure that in case the complaint is being of such a nature that can be resolved immediately, to do so that the client will be satisfied and will not have to pursue the filling of a formal complaint.

4.1.3. Upon receiving the written formal complaint, the Customer Support Department shall forward to the Compliance Department and accordingly the Compliance Department shall commence the investigation by forwarding the complaint to the head of the department where the complaint is addressed.

4.1.4. The facts as stated by the client are examined and verified and whether any additional information needed, these are retrieved from the Company's archive (electronic mail, recorded telephone calls, IT data, etc).

4.1.5. Upon completion of the investigation, a response is prepared by the Compliance Department, brought to Management's attention and Management gives the final approval for the formal response to the client and the actions to be taken.

4.1.6. The Company shall provide a response to the complainant within two months from the date the complaint was received. If the Company is unable to respond within two months, it informs the complainant of the reasons for the delay and indicates when the Company's investigation is likely to be completed. If needed, during the investigation of the complaint, the Company informs the Complainant of the handling process of his complaint.

4.2. Additionally, the clients must inform the Company about any trading error within 24 hours from the error time, otherwise the Company will not be able to investigate the error. Any trading error coming from the Company will be amended where possible. If a situation arises which is not expressly covered by these Terms, the parties agree to try to resolve the matter on the basis of good faith and fairness and by taking such action as is consistent with market practice.