



COMPLAINT HANDLING PROCEDURE

Table of Contents

- 1. Introduction..... 2
- 2. Interpretation of Terms 2
- 3. Scope of the Complaints Handling Procedure 2
- 4. Definition of a Complaint..... 2
- 5. Procedure 2
- 6. Principles of the Procedure..... 3
- 7. Frequently Asked Questions (FAQs)..... 3
- 8. Record-Keeping..... 3
- 9. Contacts..... 3

1. Introduction

- 1.1. CM Index LTD (hereinafter referred to as the 'Company'), is incorporated under the laws of Saint Vincent and the Grenadines with Registration 26493 BC 2021 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 Account Opening Agreement (herein the "Agreement") sets out the terms and conditions for the provision of investment services under the International Business Companies (Amendment and Consolidation) Act, Chapter 149 of the Revised Laws of Saint Vincent and Grenadines, 2009, by CM Index LTD (herein the "Company") to the Clients.
- 1.3. 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 instrument.

2. Interpretation of Terms

- 2.1. Unless the context requires otherwise, all terms included in this Procedure 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 Complaints Handling Procedure

- 3.1. The purpose of the Procedure 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. A complainant is a person, natural or legal, which is eligible for lodging a complaint to a Company and who has already lodged a complaint.
- 4.2. A complaint received by a Client shall include:
 - (a) the Client's name and surname;
 - (b) the Client's trading account number;
 - (c) the affected transaction numbers, if applicable;
 - (d) the date that the issue arose and a description of the issue.
- 4.3. A complaint must not include offensive language directed either to the Company or a Company employee.

5. Procedure

- 5.1. All complaints or grievances must be in writing and shall be addressed, to the Customer Support Department of the Company via email at support@cmindex.com (for any issues other than trading issues) or the Trading department reachable at support@cmindex.com for any trading issues.
- 5.2. If the client receives a response from the Customer Support or Trading Department but deems that the complaint or grievances need to be raised further for an independent review, the client may either ask the Customer Support or Technical Department to escalate it to the Finance Department, which will independently and impartially investigate it.
- 5.3. 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 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 to obtain further clarifications and information relating to his complaint. The Company shall need the Client's cooperation to handle the complaint.

- 5.4. Upon receipt of the complaint the department which has received the complaint shall record the complaint in the complaints registered maintained by the Company as per Par. 8 of the Procedure.
- 5.5. 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.
- 5.6. The Company will treat each complaint with reasonable care and reach a fair outcome.
- 5.7. Upon receiving the complaint, the Company will inform the complainant within five (5) business days that it had received the complaint and provide him with a unique reference number, which shall correspond solely to his complaint and it must be used throughout his correspondence with the Company regarding the specific matter and/or complaint.
- 5.8. The Company shall send its initial response to the Client within ten (10) business days from the actual receipt of the complaint. If the complaint requires further investigation and it cannot be resolved within ten (10) business days, it will issue a holding response in writing or another durable medium. When a holding response is sent, it will indicate when the Company will make further contact and inform the Client on the progress of the investigation.
- 5.9. The Company shall investigate and reply to the complainant within three (3) months from the date of reception of the complaint.
- 5.10. Upon completion of the investigation the Company shall send a written notice to the complainant informing him:
 - (a) Of the outcome of the investigation along with the reasons for reaching such a decision; or
 - (b) If applicable, the nature and terms of any offer and/or settlement.
- 5.11. If the Company does not manage to conclude its investigation and/or respond to the complainant within three (3) months 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 within it shall be able to complete the investigation. It is

noted that the Company shall not provide its response later than three (3) months from the submission of the complaint.

6. Principles of the Procedure

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

7. Frequently Asked Questions (FAQs)

- 7.1. Questions regarding this procedure should be sent to the Customer Support Department.

8. Record Keeping

- 8.1. The Company has established, maintains and updates the complaints register with details of all the complaints received per month for five (5) years. The following information is recorded in the complaints register:
 - (a) date of the complaint;
 - (b) wallet number;
 - (c) identification of the complainant;
 - (d) complaint cause;
 - (e) the financial instrument;
 - (f) the disputed amount;
 - (g) settlement date if applicable; and
 - (h) any comments thereof.

9. Contacts

- 9.1. Support Department:
- 9.2. Technical Department:
- 9.3. Finance Department: