

## **COMPLAINTS POLICY**

#### **1. POLICY STATEMENT**

E-Global Trade & Finance Group, Inc. (hereinafter referred to as "E-Global") is committed to provision of high quality and professional services to all clients on a continuous basis. E-Global strives to resolve cases timely and provide courteous, helpful, open and informative responses to every inquiry made by its clients or general public. E-Global is always keen to hear feedback from its clients on service quality and general performance.

However, should a case occur, where provided services reasonably did not meet the expectations of clients of E-Global, or where E-Global upon misconduct or gross negligence failed to provide the service as such, or other issue where the client of E-Global had a negative experience, the client has the right to submit a complaint with E-Global and expect a formal, fair and just investigation to be conducted into the matter and respective resolution provided.

This Complaints Policy outlines the process of submitting a complaint and what activities shall E-Global perform to provide a resolution.

### 2. MAKING A COMPLAINT

E-Global clients are welcome to address their issues to Customer Support Department at first to acquire prompt solutions towards them. Should the Customer Support Department provide a response, which the client deems as unsatisfactory, or is unable to resolve the issue, or if the client is willing to undergo the formal complaints resolution process at once, then the client is recommended either to request the Customer Support Department to forward his issue to Complaints Department or submit his complaint directly to complaints@markets4you.com.

. .

telephone. While submitting the complaint in writing the complainant (i.e. the client) should ensure to provide the following information to Complaints Department to enable faster resolution:

- The client's name and surname;
- The client's trading account number;
- The affected transaction numbers, if applicable;
- The date and time when the issue had been experienced; and
- A detailed description of the issue.

When submitting the complaint by telephone, the operator might read the complaint back to the client to ensure that the complaint details have been captured accurately. On some occasions, Customer Support Department may still ask to submit the complaint in writing, in order to properly collect and record the relevant information for complaint's resolution.

#### 3. INITIAL RESPONSE AND ACKNOWLEDGEMENT

E-Global shall provide an initial response to the complainant within 2 business days. The initial response shall include the following information:

- Acknowledgment that the complaint has been received by the Complaints Department;
- Name of the employee further handling the complaint;
- Any findings so far, or any other information that might be relevant to the issue;
- Complaint resolution time frames;
- A copy of Complaints Policy attached.

#### 4. HOLDING RESPONSE

Should E-Global fail to conclude the investigation and provide the complainant with the final response within 15 business days from the date the complaint had been acknowledged,



#### E-Global shall issue a Holding Response.

This Holding Response shall inform the complainant of the reasons why E-Global has been unable to issue a Final Response to the submitted complaint as well as provide further indication of progress made on the complaint investigation and when the complainant may expect to hear from E-Global next.

#### 5. FINAL RESPONSE

Once E-Global concludes its investigation an email containing the summary of the investigation shall be sent to the complainant. Where appropriate such e-mail may include a final offer of redress.

Should E-Global fail to resolve the complaint to the complainant's satisfaction, or the complainant finds the offer of redress insufficient or inappropriate, the Final Response will hold contact information of BVI FSC for further mediation of the complaint.

### 6. FINANCIAL SERVICES COMMISSION (FSC) BVI

The FSC is an autonomous regulatory authority responsible for the regulation, supervision and inspection of all financial services in and from within the BVI. To contact the FSC, customers of E-Global are advised to write, telephone, fax or e-mail their complaint to:

#### British Virgin Islands Financial Services Commission

Pasea Estate P.O. Box 418 Road Town, Tortola, VG 1110 British Virgin Islands Tel: 284-494-1324 or 284-494-4190 Fax: 284-494-5016 Email: <u>commissioner@bvifsc.vg</u>

Customers are not obliged to accept any decision made by the Commission in respect to their complaint and remain the right to further seek redress in court. However, should the decision made by the Commission be accepted, it immediately shall become binding both on the complainant and E-Global.

#### 7. UNACCEPTABLE ACTIONS

Occasionally, the behavior or actions of individuals may create a situation where E-Global may find it difficult to provide proper complaints handling. E-Global understands that some issues that are complained of may raise frustration of the complainant, however, if this escalates into any aggression (regardless the form and method) towards E-Global staff, it will be considered unacceptable. Any violence or abuse towards staff will not be accepted.

Violence is not restricted to acts of aggression that may result in physical harm. It also includes behavior or language (whether verbal or written) that may cause staff to feel afraid, threatened or abused, and may include threats, personal verbal abuse, derogatory remarks and rudeness. E-Global also considers inflammatory statements and unsubstantiated allegations to be abusive behavior.

E-Global also recognizes unreasonable demands to be a form of abusive behavior, where the demand becomes unreasonable, when it starts to impact substantially the work of the Complaints Department. Examples may include:

- Repeatedly demanding responses within an unreasonable timescale;
- Insisting on speaking to a particular representative of the company, when that is not possible;
- Repeatedly changing the substance of a complaint or raising unrelated concerns.

Should E-Global identify the actions of the complainant as unacceptable it shall act to protect its employees. Examples of such actions may include restricting communication to written form, or refusing further communication as such, should abusive or offensive language be used in correspondence. In cases of threats involving physical violence E-Global may file a report to the respective law enforcement institutions.

Nevertheless, E-Global shall always inform the



# 8. POLICY REVIEW (QUALITY CONTROL)

In its effort to improve the provided services E-Global shall have the Compliance Officer review all complaints on a quarterly basis for the identification of systemic or recurring issues. Should such issues be identified, E-Global shall consider what actions it may take to address or have them rectified.

The Compliance Officer, or appropriate appointee, shall review the Complaints Policy periodically, and at least annually, to enhance its delivery of efficient and effective outcomes. E-Global shall observe the recommendations made and consider what actions can be taken to address the identified deficiencies.