

AXITRADER

Complaints Handling Policy

SOLARIS EMEA Limited

COMPLAINT HANDLING POLICY

1. Complaint or grievance handling

The purpose of this Policy is to set out the procedure to be followed and the appropriate action required to be taken by Solaris EMEA Ltd (the “Company”) in the case of a complaint by any client to ensure the Company’s compliance with the Law and Operating Conditions of the Cyprus Investment Firms.

Definitions

“**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.

“**FOS**” means Financial Ombudsman Service.

“**the CySEC**” means Cyprus Securities and Exchange Commission.

The Company established, implemented and maintains effective and transparent procedures for the reasonable and prompt handling of complaints or grievances received from clients or potential clients, and to keep a record of each complaint or grievance and the measures taken for the complaint’s resolution.

In addition, the Company:

- Applies a complaint handling policy, which is defined and endorsed by the senior management and the board of directors, who is responsible for its implementation and for monitoring the Company’s compliance with it.
- Ensures that it has a complaints management function, which enables complaints to be investigated fairly and possible conflicts of interest to be identified and mitigated.

1.1 Policy

Clients’ complaints or grievances can be received by any member of staff, however are usually handled by the Customer Support Department. The final settlement of non-trivial complaints or grievances needs to be approved by the Senior Management and Compliance of the Company.

1.2 Submitting a Complaint

A complainant shall complete the Complaint Form developed by the Company (available on **Appendix 1** of this Policy). The complaint must provide details to the Company in writing, specifying the nature of the complaint, providing us with specific details of the desired outcome or action of the Company that would satisfy the complainant.

Once the form is completed and signed, it should be sent either in a hard or soft copy to the Company's head offices which are situated at Agios Athanasios 58, El Greco Building, 2nd floor, Office 202, 4102 Limassol, Cyprus or by e-mail to Compliance.cy@axitrader.com. The Company may request from the complainant to provide relevant material to support the complaint.

1.3 Complaint Handling

The Company confirms, within five days, the receiving of the complaint to the complainant and provides the complainant with a unique reference number which will be used for all future communication with the Company and/or the CySEC and/or the Financial Ombudsman regarding the complaint. The Company investigates the complaint and replies, within two months, to the complainant whether the complaint has been successfully resolved or whether further time will be needed for an outcome. During the investigation of the complaint, the Company informs the complainant of the handling process of his/her complaint.

In the event that the Company is unable to respond within two months, the Company informs the complainant of the reasons for the delay and indicates the period of time within which it is possible to complete the investigation. This period of time cannot exceed three months from the period of submission of the complaint.

If after a period of three months, the Company has not completed its investigation and provided a final response, the Company must either:

- A) Provide a final response in writing which:
 - a. accept the complaint, and where appropriate, offer redress or remedial action; or
 - b. offer redress or remedial action without accepting the complaint; or
 - c. reject the complaint and give our reasons for doing so, and, which
 - i. Provides the website address of the Financial Ombudsman Service;
 - ii. Informs the complainant that he or she may refer the complaint to the FOS if dissatisfied and, if so, do so within four (4) months of the date of our final response;
- and

iii. Indicates whether or not we consent to waive the relevant time limits.

- B) Provide a written response:
 - a. Explaining why we are not in a position to make a final response and provide an indication as to when we expect to be able to do so;
 - b. Inform the complainant that he or she may now refer the complaint to FOS;
 - c. Indicate whether or not we consent to waive the relevant time limits;
 - d. Provide the website address of the FOS.

If the provided investigation results do not fully satisfy the complainant's demands, the Company should provide to the complainant in writing a thorough explanation of its position on the complaint and set out the complainant's option to maintain the complaint e.g. through CySEC, the Financial Ombudsman, or the relevant Courts. The Financial Ombudsman Service is an independent service in Cyprus for settling disputes between businesses providing financial services and their customers. The complainant may contact the FOS within four months of receiving a final response from the Company, otherwise the Financial Ombudsman may not be able to deal with the complaint.

Contact Details of the Financial Ombudsman:

Address: Kipranoros 15, 1061 Nicosia, Cyprus

Phone: +357 22848900

Complaints: complaints@financialombudsman.gov.cy

Website: <http://www.financialombudsman.gov.cy>

The Company advises that the FOS will not consider a complaint until the Company has had the opportunity to address the complaint, and any reference to FOS should not be made by the complainant until he/she receives a final response from the Company or four months after the date of the complaint, whichever is sooner.

The Company maintains all complaints or grievances for a minimum period of five years.

2. Updates of the Complaint Handling Policy

The Company assess and periodically reviews, on at least annual basis, the Policy and takes all appropriate measures to address any deficiencies. In the event that the Company materially changes this Policy, the revised Policy is uploaded in the Company's website. In this respect, the Clients are requested to hereby accept the revised Policy electronically. Any dispute over the Company's Policy is subject to this notice and the Client Agreement. The Company encourages its Clients to periodically review the Policy and a report is provided to the senior management.

Any updates and/or changes in the Policy of the Company is approved by the Board of Directors of the Company. Policy is required to be reviewed annually a report is provided to the senior management.

3. Appendices

Appendix 1 – Complaint Form



COMPLAINT FORM

Unique Identification Number: _____
(this will be provided to you by the Company)

Client's Name: _____

Account ID: _____

Address: _____

Email: _____

Description: _____

Date: _____

Signature: _____

Please enclose any evidence and relevant documentation. Submit the form to Compliance.cy@axitrader.com or by fax at +357 25255567 or via post to Agios Athanasios 58, El Greco Building, 2nd floor, Office 202, 4102 Limassol, Cyprus

Internal Use Only

Employee handling the complaint: _____

Position: _____

Date of Receipt: _____ Date of response: _____

Result and Date of final resolution:
