



COMPLAINTS HANDLING PROCEDURE

***Risk Warning:** CFDs are complex instruments and come with high risk of losing money rapidly due to leverage. 89% of retail investor accounts lose money when trading CFDs with their provider. You should consider whether you understand how CFDs work and whether you can afford to take the high risk of losing your money.*

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1. INTRODUCTION

UBK Markets Ltd is incorporated in the Republic of Cyprus with registration number HE293861. The Company is authorized and regulated by the Cyprus Securities and Exchange Commission (CySEC), with license No. 186/12. The Company's office is located at Kyriakides Business Center, 2d floor, Leoforos Spyrou Kyprianou, 67, 4003, Limassol, Cyprus.

The Customer acknowledges that the Company's official language is English.

The Company is operating under Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on Markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU (the "Markets in Financial Instruments Directive (2014/65/EU)" or "MiFID II") and amending Directive 2002/92/EC and Directive 2011/61/EU, as last amended by Directive (EU) 2016/1034 of the European Parliament and of the Council, of 23 June 2016 and under Regulation (EU) No. 600/2014 of the European Parliament and the Council of 15 May 2014 on markets in financial instruments and amending Regulation (EU) No. 648/2012 (the "MiFIR") which was implemented in Cyprus by the Investment Services and Activities and Regulated Markets Law of 2017 (Law 87(I)/2017), which provide for the provision of Investment Services, the exercise of Investment Activities, the operation of Regulated Markets and other related matters (the "Investment Services and Activities and Regulated Markets Law"), as the same may be modified and amended from time to time.

2. CUSTOMER COMPLAINTS

As per the Directive DI144-2007-01 of 2012 for the Authorization and Operating Conditions of CIFs (the "Directive"), UBK Markets Ltd (the "Company") is required to "establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints or grievances received from retail Customers or potential retail Customers, and to keep a record of each complaint or grievance and the measures taken for the complaint's resolution".

DEFINITION OF A COMPLAINT

UBK Markets Ltd declares a complaint as any grievance and/or objection and/or criticism against the Company concerning the activities of those persons under the control of the Company (the employees) in connection with the provision by the Company of the investment and/or ancillary services it offers.

3. COMPLAINT HANDLING PROCEDURE

The Compliance Officer shall be responsible for handling Customer complaints, except in the case where the complaint involves the Compliance Officer, whereby the complaint shall be handled by the Managing Director.

The Company tries to ensure independence via the Compliance Officer, which enables complaints to be investigated fairly and possible conflicts of interest to be identified and mitigated.

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If a Customer has any objection with respect to the provision of investment and ancillary services and/or the performance of investment activities, he/she is encouraged to submit a complaint form at complaints@ubkplatform.com and/or to send an email to complaints@ubkplatform.com.

The complaint form is attached as the *Appendix I*.

Any Customer's complaints received will be forward to the Compliance Officer.

The complaints handling arrangements established by the Company should be known and easily accessible to Customers.

The Company will endeavor to ensure all communication is in plain language which is clearly understood.

The Company shall send a written acknowledgment to the Customer within forty-eight (48) hours (2 working days, as mentioned above) from the time the complaint is received, describing the procedure and who is responsible for handling it, confirming that the complaint has been received and that it will take all required actions to resolve the complaint, as well as the approximate time required to do so.

This acknowledgement will confirm the necessary action required to resolve the complaint and will contain details of our Complaints Handling Procedure, and of your right to refer the Complaint to the Financial Ombudsman if you are dissatisfied with our assessment and ruling.

When the Compliance Officer receives the Complainant's complaint, a written acknowledgement will be sent to the Complainant confirming:

- the Complaint Reference Number;
- the name and job title of the person dealing with the complaint;
- the Complaint Handling Process.

The Company will gather and investigate all relevant evidence and information regarding the complaint and provide an Initial response without any unnecessary delay and within 14 (fourteen) working days from the date that the Compliance Officer receives the complaint, including any offer of redress if applicable.

When an answer cannot be provided within the expected time limits, the Company shall inform the complainant about the causes of the delay and indicate when the Company's investigation is likely to be completed.

Within 4 weeks, and no later than 3 months, from the date that we receive a complaint, the Company will endeavor to provide a final response, including any offer of redress if applicable, or a holding response will be sent to the Complainant explaining the findings of the investigation.

In the case where a holding response is sent to the Complainant, an explanation shall be given stating the reasons why the Company has not been able to resolve the complaint and indicate an estimated time to resolve the issue.

If after 3 months of receiving the complaint, the Company is still not able to resolve the issue, the Compliance Officer will notify the Complainant, stating the reasons.

If the Complainant is not satisfied, the Complainant may then refer the complaint to the Cyprus Securities and Exchange Commission (CySEC) and/or the Financial Ombudsman.

If the Complainant does not indicate further dissatisfaction within 8 weeks from our Compliance Officer's final response, the complaint will be considered resolved.

4. COMPLAINTS REGISTER

For the purposes of compliance with paragraph 13(5) of the Directive the Company must register the complaints it receives, as soon as possible, in an internal register with an appropriate manner, as well as for easy reference and retrieval. Also the Company must apply the following:

- Upon receiving the complaint, the Company will register the complaint directly to an internal register, giving it a **unique reference number** which will be considered of ten digits.
- The unique reference number is communicated to the Complainant.
- The Company stores all complaints it receives on an internal archive, as quickly as possible, and in an appropriate manner.
- The Company is required to provide to the CySEC information regarding the complaints it receives via an electronic form on a monthly basis.

The Complainant should use the said reference number in all future contact with the Company, the Financial Ombudsman and/or the CySEC regarding the specific complaint.

5. FAQs

Questions regarding this Procedure should be addressed, in the first instance, to the Customer Support Department.

AMENDMENTS

The Company analyses, on an on-going basis, complaints handling data to ensure that they identify and address any recurring or systemic problems, and potential legal and operational risks, for example by:

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- analyzing the causes of individual complaints so as to identify root causes common to types of complaints;
- considering whether such root causes also affect other processes or financial means, including those not directly complained of; and
- correcting, where reasonable to do so, such root causes.

MONITOR AND REVIEW

The Company shall monitor on a regular basis the effectiveness of this Policy. In addition, the Company shall review the Policy at least annually. A review will also be carried out whenever a material change occurs that affects the ability of the Company to continue to obtain the best possible result for the execution of its Complainant's orders on a consistent basis using the venues included in this Policy. The Company shall notify its affected Complainants on any changes in its Policy.

APPENDIX I

CUSTOMER COMPLAINT FORM

A. Customer Information:

Name:	Account Number:
Address:	Telephone Number:

B. Brief Summary of the Complaint:

Name of Employee:	Department:
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Please describe the product or service you are complaining about (description, evidence, amount and suggested way to be solved):

Please enclose any other relevant documentation that may help us to handle the complaint.

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Date and Place

Customer Signature

For internal use only:

Complaint received by:

Date of reception:

Reference number:

Department involved:

Initial response to the Customer: Yes No

Date:

Initial action taken:

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The Customer has been informed of initial action taken: Yes No

Date:

Further action taken: Yes No

Date:

Further action taken:

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File has been handed on to General Manager: Yes No

Date:

Settlement of complaint: Yes No

Date:

Summary of how the complaint has been settled:

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Signature of Responsible Officer:

Date: