

March 2024

License no. GB24202825

ICM Brokers Ltd

Customer Complaint Policy

Version 1.0

This Policy regulates effective, clear and fast handling of complaints and disputes submitted to the Company in relation to the performance and procedures of the Company.

ICM Brokers Ltd is an Investment Dealer (Full-Service Dealer, excluding Underwriting), regulated by the **Financial Services Commission ('FSC') in Mauritius** under the license number **GB24202825** (hereinafter referred to as "**ICM Brokers**" or the "**Company**").

1. Introduction

The Company is committed to providing high-quality services to its clients. In the event that a client is dissatisfied with any aspect of our services, the Company has established a comprehensive Complaints Resolution System to address and resolve such concerns promptly and fairly.

2. Quality Control Officer (QCO)

The Company shall designate a Quality and Control Officer ("**QCO**") who reports directly to the Board. The QCO will be responsible for overseeing the handling of complaint reviews and ensuring the effective resolution of all client complaints. All clients' complaints against the Company shall be directed to [insert email]. Initially, the DMLRO of the Company shall act as the QCO until the Board Members of the Company shall subsequently appoint an alternative officer based on their seniority, access rights and functions.

3. Complaint Handling Timeframe

Upon receipt of a complaint, the Company will acknowledge it promptly and commit to resolving it within thirty (30) days. The QCO shall oversee the transparent, independent, courteous, and efficient handling of all complaints, ensuring their resolution within the specified timeframe.

Formal complaints shall be formally acknowledged within five working days.	5 working days
Full reply will be made	21 working days
<i>*In case a full reply cannot be made within 21 working days of receipt, we shall advise the complainant accordingly and let the complainant know when a reply in full will be made.</i>	
Resolution of complaint	30 working days

4. Complaints Register

The Company shall maintain a Complaints Register to record all complaints received. The register will include the date of the complaint, acknowledgment date, category of complaints, and actions taken. No complaint shall be left unresolved, and the closure date shall be noted on the complaint filing.

5. Review and Amendment

This Complaint Policy shall be reviewed annually to ensure its effectiveness. Any necessary amendments will be made to enhance the Company's commitment to handling complaints transparently and improving overall service quality.

The Company must develop and put into practice an independent and objective complaints resolution system, as provided below.

6. Standards for handling complaints

- (a) All complaints shall be dealt with due attention, whether they are formal or informal.
- (b) Complaint(s) will be treated in confidence, whatever such complaints.
- (c) Complaint(s) shall be dealt promptly. Formal complaints shall be formally acknowledged within five working days and a full reply will be made within 21 working days of receipt. In case a full reply cannot be made within 21 working days of receipt, we shall advise the complainant accordingly and let the complainant know when a reply in full will be made.

All complaints shall be taken seriously, handled transparently and promptly investigated. The RCO shall ensure that all complaints be dealt with in an independent courteous and efficient manner and resolved within the delay as stated in paragraph above. No complaint should be left unresolved and the date the complaint is “closed” should be noted on the complaint filing.

7. Confidentiality

All complaints received will be dealt with confidentially and in accordance with the requirements of the Data Protection Act 2017.