

LeadCapital Markets Limited
CIF License No. 227/14

**Complaints Handling &
Disputes Policy**

Copy Number:	1
Issue:	Version 1.3
Date:	29 th June 2017

Owner: Compliance
Prepared by: Compliance
Approved by: Board of Directors

Complaints Handling and Disputes Policy

Introduction

Lead Capital Markets Limited (the “**Company**”) regulated by the Cyprus Securities & Exchange Commission (License No. 227/14) aims to provide all its customers/clients (the “**clients**”, the “**customer**”) with the highest standard of service.

As part of our commitment to providing the best possible service to our clients, the Company upholds effective and transparent procedures for prompt complaint handling for existing and potential retail clients and the Company maintain records of complaints and measures taken for complaint resolution, in line with applicable MiFID legislation and guidelines of the CySEC.

Scope of the Policy

The Complaints Handling and Disputes Policy sets out the processes followed when dealing with Complaints received by customers/clients.

Definition of a Complaint

A complaint is an expression of dissatisfaction by a client regarding the provision of investment and/or ancillary services provided by the Company.

If a client wishes to lodge a complaint, he/she must provide the following information to the Company:

- 1) the client's name and surname;
- 2) the client's trading account number;
- 3) the affected transaction (s) numbers
- 4) the date and time of the disputed issue/trade;
- 5) a brief description of the issue.
- 6) Please note that a complaint must not include: Offensive language directed either to the Company of any of its employees.
- 7) Name of Company's employee that you had contact with and/or the relevant department

Procedure

All complaints must be in writing and shall be addressed to the Compliance Department in the first instance. If complaints are sent to the Customer Support Department, the complaint needs to be escalated to the Compliance Department, which will independently and impartially investigate it. The client can submit the complaint also by hand or by post as mentioned below.

The Company will acknowledge receipt of your complaint within five (5) business day(s) from the receipt of your complaint and provide you with a unique reference number which should be used in all your future contact with the Company, the Financial Ombudsman and/or Cyprus Securities and Exchange Commission (CySEC) regarding the specific complaint.

Both the Customer Support Department and the Compliance Department shall thoroughly examine any complaints as required (taking into account any information contained within the books and records of the Company)

The Company shall make every effort to investigate your complaint and provide you with the outcome of our investigation within not more than two (2) months from the

date you have submitted your complaint to us. During the investigation process you will be kept updated of the handling process of your complaint. In case the Company are unable to respond you in this period of time, you will be informed for the reasons of the delay and the period of time when the investigation will be completed which will be no more than three months from the submission of the complaint.

The client may submit complaints through the following options:

1. By post or by hand the attached Complaints Form at the below address:

Address: 9 Kafkasou Street, Treppides Towerr, 5th Floor, 2112 Nicosia, Cyprus

2. By submitting the Complaints Form electronically at the below address:

Email: compliance@leadcapitalmarkets.com

All complaints will be treated strictly confidential.

If you believe that your Complaint has not been handled in a fair and equitable manner by the Company you have the right to refer the matter to the Financial Ombudsman of the Republic of Cyprus, ADR Mechanism, or the relevant Courts.

The Financial Ombudsman is an independent service for settling disputes between the financial firms and their clients. For more information, please go to: <http://www.financialombudsman.gov.cy>.

**Escalation &
Financial
Ombudsman**

If wish to escalate your complaint you are advised to submit your complaint to the Financial Ombudsman at: complaints@financialombudsman.gov.cy with all relevant information/documentation and evidence of your complaint.

You may also maintain your complaint with the Cyprus Securities and Exchange Commission. However please note that the Cyprus Securities and Exchange Commission does not have restitution powers and therefore does not investigate individual complaints.

Contact Details of the CySEC: The Company website: <http://www.cysec.gov.cy>
General email: info@cysec.gov.cy

COMPLAINTS FORM

Way of Communication:	FAX <input type="checkbox"/>	Email <input type="checkbox"/>	Tel <input type="checkbox"/>	Letter <input type="checkbox"/>
-----------------------	------------------------------	--------------------------------	------------------------------	---------------------------------

Client details

Name:	Surname:
-------	----------

Account Number:

LegalEntityName (if applicable):

Address:

Post Code:	City:	Country:
------------	-------	----------

Telephone Numbers:	Home:	Work:	Mobile:	Fax:
--------------------	-------	-------	---------	------

Email:

Brief Summary of the complaint Please answer in details the questions below:

1. the affected transaction(s) numbers:
2. the date and time of the disputed issue/trade:
3. a brief description of the issue:

Please enclose any other relevant documentation that may enable us to handle and resolve the complaint.

I hereby certify and confirm that to the best of my knowledge, the information furnished above is true, accurate, correct and complete.

Signature:	Date:
------------	-------

For internal use only

Complaint received by:

Date of reception: / /

Reference number:

Department involved:

Employee involved:

Initial response to client: Yes, No

Date: / /

Initial Action Taken:

.....

.....

Informed client of initial action taken: Yes, No

Date: / /

Further Action Taken: Yes, No

Date: / /

Further Action Taken:

.....

.....

File handed on to Compliance Officer: Yes, No

Date: / /

Settlement of complaint: Yes, No

Date: / /

Summary of how the complaint was settled:

.....

.....

Signature of Responsible Officer:

Date: / /