

Complaints Management Policy

Version 3

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Applies to:

StoneX Europe Ltd (“**SEL**” or “**The Firm**”)

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1. Introduction

StoneX Europe Ltd (the “Company”, “SEL”, “we”, “us” or “our”) is a Cyprus Investment Firm (‘CIF’) authorised and regulated by the Cyprus Securities and Exchange Commission (“CySEC”). This Complaints Management Policy (the “Policy”) explains how clients and potential clients may submit a complaint to the Company and how such complaints are handled. The Company is committed to handling complaints promptly, fairly, consistently and transparently, and to communicating with clients in clear and plain language throughout the complaints-handling process. This Policy provides clear, accurate and up-to-date information on the Company’s complaints handling arrangements, including how complaints may be submitted, the information that should be provided, the applicable response timeframes, and the options available where a client remains dissatisfied with the Company’s response.

For your benefit and protection, you should take sufficient time to carefully read this policy as well as any other additional documentation and information available to you via the Company’s website and client portal prior opening a trading account and/or engaging to any trading activities with the Company.

2. Legal and Regulatory Framework

This Policy has been prepared in accordance with the requirements applicable to Cyprus Investment Firms under Directive 2014/65/EU on Markets in Financial Instruments (“MiFID II”), as transposed into Cyprus law by the Investment Services and Activities and Regulated Markets Law of 2017, as amended.

In particular, this Policy takes into account Article 26 of Commission Delegated Regulation (EU) 2017/565, which sets out requirements relating to complaints handling by investment firms, including the establishment and maintenance of effective and transparent complaints management arrangements.

3. Purpose

The purpose of Policy is to set out the method for the submission of complaints within the Company from a Client as well as the procedures to be taken with the aim of resolving promptly and transparently any potential misunderstandings and inconveniences that may occur during the business relationship. In this respect, the Company is committed to deal and handle Clients’ complaints, disputes or any grievances received with confidentiality and fairness and will take all reasonable and necessary measures to efficiently resolve any matter arising from the provisions of its investment and/or ancillary services. This Policy is approved by the Company’s management body and is subject to periodic review to ensure that it remains appropriate and effective.

4. Definitions and General Principles

- 4.1. For the purposes of this Policy, references to “Client”, “You” or “Your” mean a client or potential client of the Company, as applicable.
- 4.2. “Complaint” is a statement or expression of dissatisfaction, whether made orally or in writing, submitted by a natural or legal person in relation to the provision of investment and/or ancillary services by the Company.
- 4.3. “Complainant” means a natural or legal person who is eligible to have a Complaint considered by the Company and who has submitted a Complaint.
- 4.4. The Company shall assess communications based on their substance and circumstances when determining whether they should be treated as a Complaint under this Policy.
- 4.5. General enquiries, service requests, technical support issues or other routine communications that do not express dissatisfaction may be treated as enquiries and forwarded to the appropriate department for handling.
- 4.6. Where a matter is initially treated as an enquiry, service request or routine communication, but You remain dissatisfied with the outcome or request that the matter is escalated as a Complaint, the

Company shall assess whether the matter should be recorded and handled as a Complaint under this Policy.

5. Submission of a Complaint

- 5.1. If You are dissatisfied with the service provided by the Company, You may contact the Company through the available communication channels as indicated in the Company's website or client portal.
- 5.2. Where Your concern cannot be resolved to Your satisfaction, or where You wish the matter to be treated as a Complaint, You should make this clear to the Company. The Company will assess the matter in accordance with Section 4 of this Policy and determine whether it should be recorded and handled as a Complaint.
- 5.3. Complaints may be submitted orally or in writing. However, in order to assist the Company in investigating Your Complaint effectively and without undue delay, You are encouraged to submit the Complaint in writing by completing the Complaint Form included in Appendix A of this Policy and providing any relevant supporting information or documentation.
- 5.4. The completed Complaint Form and any supporting documents shall be submitted via email to the Company at eucomplaints@forex.com or via post to *Nikokreontos 2, 5th Floor, 1066 Nicosia, Cyprus*. Where a Complaint is initially submitted orally or through another communication channel, the Company may request that You provide additional information or complete the Complaint Form to facilitate the investigation. This does not prevent the Company from assessing and recording the matter as a Complaint where sufficient information is available.
- 5.5. The Company may request additional information, clarifications or supporting documentation from You where this is necessary to assess and investigate the Complaint. Failure to provide sufficient information may affect the Company's ability to investigate the Complaint properly or within the applicable timeframes.

6. Complaints Handling Procedure

- 6.1. Upon receipt of a Complaint, the Company will acknowledge receipt of the Complaint in writing **within five (5) days** and provide You with a Unique Reference Number ("URN"). **The URN shall be used in all future correspondence with the Company, CySEC and/or the Financial Ombudsman of the Republic of Cyprus in relation to the Complaint.**
- 6.2. Complaints may be submitted to the Company free of charge. The Company will communicate with You in a clear and plain language that is easy to understand and will respond to the Complaint without undue delay.
- 6.3. The Company will assess and investigate the Complaint fairly, independently and with due care, taking into account the information and supporting documentation provided by You and any relevant information available to the Company.
- 6.4. In order to assist the Company in investigating and resolving the Complaint as efficiently as possible, You are encouraged to complete the Complaint Form included in Appendix A of this Policy and provide the following information, where applicable:
 - Your full name, address and trading account number;
 - a clear description of the Complaint, including relevant dates, transactions, trading positions and any relevant details;

- the amount of any loss or damage claimed, where applicable;
- copies of any relevant documents or correspondence); and
- a telephone number or other contact details through which the Company may contact You.

- 6.5. Following receipt and registration of the Complaint, the Company will provide You with its final response within two (2) months from the date on which the Complaint was received by the Company.
- 6.6. During the investigation process, the Company will keep You updated of the handling process of Your Complaint, where appropriate.
- 6.7. Where the Company is unable to provide a final response within two (2) months, it will inform You in writing, or through another durable medium, of the reasons for the delay and indicate when the Company expects to provide its final response.

In any case, the final response shall be provided no later than three (3) months from the date on which the Complaint was received by the Company.

- 6.8. Please note that the Company may consider the Complaint closed when a period of three (3) months has elapsed from the date of submission of the Complaint and You have failed to respond to the Company's requests for information, clarifications or supporting documentation, where such response is necessary for the Company to continue or complete its investigation.
- 6.9. The Company's final response will be provided in writing and will set out the outcome of the investigation. Where applicable, the final response may include a summary of the Complaint, the matters reviewed by the Company, the Company's findings, whether the Complaint has been upheld or rejected, and any remedial action or redress proposed by the Company.
- 6.10. When the Company sends the final response to You, You shall be given a period of two (2) months to respond.
- 6.11. If no response is received within this timeframe, the Company may consider the Complaint as settled and shall not be obliged to take the Complaint further, unless further correspondence is received from You indicating that You remain dissatisfied with the Company's final response. If You are not satisfied with the outcome of the Company's final response, or where no final response has been provided within three (3) months You may refer Your Complaint to the [Financial Ombudsman of the Republic of Cyprus](#), quoting the URN provided by the Company.
- 6.12. The contact details of the Financial Ombudsman of the Republic of Cyprus are set out below:

<i>The</i>	<i>Financial</i>	<i>Ombudsman</i>	<i>Service</i>
<i>Website:</i> http://www.financialombudsman.gov.cy			
<i>Email:</i> complaints@financialombudsman.gov.cy			
<i>Address:</i> 15 Kypranoros, 1061 Nicosia or P.O. Box. 26722, 1647 Nicosia			
<i>Telephone:</i> +35722848900			
<i>Fax:</i> +35722660584, +35722660118.			

- 6.13. Alternatively, You may submit Your Complaint to [CySEC](#).
- 6.14. Your right to take legal action remains unaffected by the existence or use of the complaints-handling process described in this Policy.
- 6.15. The Company will analyse, on an on-going basis, Complaints-handling data, to ensure that it identifies and address any recurring or systemic problems, and potential legal and operational risks, for example by:

- Analysing the causes of individual Complaints 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.

6.16. Kindly note that any dispute arising shall be subject to the exclusive jurisdiction of the Cyprus Courts.

7. Record Keeping

- 7.1. 7.1. All decisions related to Complaints shall be communicated to Complainants in writing and copies of such correspondence shall be retained by the Company.
- 7.2. The Company shall maintain records of Complaints received, the measures taken for their resolution, relevant correspondence, supporting documentation, investigation records and final responses.
- 7.3. All records relating to Complaints shall be retained for a period of at least five (5) years following the conclusion of the Complaint process and/or the termination of the business relationship with the Client, as applicable.

Appendix A

Complaint Form		
Please complete this form as fully and accurately as possible to assist the Company in assessing and investigating Your Complaint. The Company may request additional information, clarifications or supporting documentation where necessary.		
Client Details		
1.	Full Name:	
2.	Trading Account Number(s)	
3.	ID or Passport Number:	
4.	Nationality:	
5.	Telephone number:	
6.	Email address:	
7.	Residential Address:	
Complaint Details		
8.	Please describe Your Complaint clearly, including all relevant facts, dates, transactions, trading positions and any other information that may assist the Company's investigation.	

9.	When did the issue You are complaining about take place?	
10.	When did You first become aware of the issue?	
11.	Have You communicated your complaint previously to StoneX Europe Ltd and/or its associates (Yes/No)?	
12.	If your answer to question 11 above is YES, then please state the date you first informed StoneX Europe Ltd and/or its associates of your complaint and the name of the person you discussed your complaint with:	
12.1	Please enter the date of contact.	
12.2	StoneX Europe Ltd Representative's Name and email address	
12.3	Method of Communication.	
13.	Please attach any supporting documentation or evidence relevant to Your Complaint, such as correspondence, screenshots, account statements, transaction details, chat records, call details or other relevant records.	
14.	I hereby certify and confirm that to the best of my knowledge, the information provided in this form is true, accurate, correct and complete. ☐	
Signature.....		
Date.....		