

StoneX[®]

StoneX Europe Ltd

Complaints Management Policy

September 2024

StoneX Europe Ltd Complaints Management Policy v.09.24

1. Introduction

StoneX Europe Ltd (the 'Company' or 'we' or 'us') is a Cyprus Investment Firm ('CIF') licensed and regulated by the Cyprus Securities and Exchange Commission ('CySEC'). The Company has adopted this Clients' Complaints Management Policy (the 'CCMP' or the 'Policy') which sets out the procedures to be followed, whenever a client files a complaint against the Company regarding any aspects of its activities and services. The CCMP provides clear, accurate and up-to-date information about the complaints handling process.

The Company has adopted this Policy specifically designed for Clients to ensure a fair and quick process for handling Client Complaints that may arise from the Company's relationship with its Clients. The Company must deal with any expression of dissatisfaction about any financial services activity provided or withheld by the Company in accordance with this Policy.

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.

The Company will deal with your complaint or enquiries in a prompt, fair and efficient manner. The Company will follow the procedure outlined hereunder to ensure that your complaint or enquiry is resolved within reasonable time frames.

2. Legal and Regulatory Requirements

The Company operates under the provisions of the 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, as the same may be in force from time to time and modified or amended from time to time (the '**MiFID II**'), which was transposed in to Cypriot Law, the Investment Services and Activities and Regulated Markets Law of 2017 (the '**Law**'). The Complaints Management Policy has been drafted considering the content requirements set out in Article 26 of the Commission Delegated Regulation 2017/565 (the '**Delegated Regulation**').

In accordance with the abovementioned legislation as well as any directives issued by CySEC pursuant to it, the Company is required to establish, implement and maintain effective and transparent complaints management policies and procedures for the prompt handling of clients' or potential clients' (the '**Client**' and/or '**You**') complaints.

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. The CMP provides clear, accurate and up-to-date information about the complaints handling process.

It is noted that the CMP is defined and endorsed by the Company's Senior Management and Board of Directors, who will be responsible for its implementation and monitoring.

4. General Terms and Explanations

- 4.1. A '**Complaint**' is a statement of dissatisfaction addressed to the Company by a natural or legal person relating to an investment and/or ancillary service provided by the Company.

All Clients' **inquiry/concern/issue/problem** points are handled initially at the front office, Client Management level, in order to ensure the timely satisfaction of Client requirements. Usually, such inquiry/concern/issue/problem points are handled within three (3) business days.

In general, the Client Management team/member shall escalate to the Compliance department/function any potential Complaint that cannot be resolved and/or the Client has requested such escalation (as per the procedure mentioned further below in this policy) and/or are considered important due to their nature.

- 4.2. In the case that the Company receives a notice, either via email, or via telephone communication, through the line of communication established by the Company to receive complaints, as per this policy and as mentioned further below, but which does not fall within the definition of Complaint above, please note that this will be

characterized as an **enquiry**. This shall be categorized as an enquiry rather than a Complaint and will be forwarded to the relevant operational department to be handled accordingly.

- 4.3. The Complainant maintains the right to request for the **reclassification** of the enquiry as a Complaint by submitting the Complaints Form as indicated in the below mentioned Appendix A.
- 4.4. A '**Complainant**' is a natural or legal person who is eligible to have a Complaint considered by us and who has already lodged a Complaint.

5. Submission of a Complaint

- 5.1. If You are dissatisfied with the service provided by the Company, please note that initially you should contact the Client Management Team, via telephone at +35722090062 or by any other available communication means, as indicated in the Company's website, which is responsible to resolve your inquiry / concern / issue / problem.

In the instance You feel that Our Client Management Team has not met Your satisfaction, You should make it clear that You remain unhappy with the outcome and request the matter to be escalated as a Complaint. In this respect, You are entitled to submit a formal Complaint as explained below.

- 5.2. Without prejudice to Section 4.4., You may submit Your Complaint in writing and address it to the Company by completing the relevant Complaint Form as included in **Appendix A** of the Policy and submit it electronically via the communication means as stated below along with any relevant attachments.

The completed Complaint Form shall be submitted via email to the Company at *eucomplaints@forex.com* or send a copy of the Complaint via post to *Nikokreontos 2, 5th Floor, 1066 Nicosia, Cyprus*.

- 5.3. Complaints communicated to the Company, via the communication means as stated above, must be received from the registered email of the Client as soon as possible after the subject matter of the complaint arose. We aim to provide a high standard of service to all Our Clients on every occasion.

It is noted that, only if You submit a complaint in accordance with points 5.1 and 5.2 above, the relevant Complaint will be considered as an Official Complaint by the Company and will be given a Unique Reference Number (the **URN**). The Company may not be able to accept Your Complaint submitted via any other means/channels.

6. Complaints Handling Procedure

6.1. Upon the receipt of Your Complaint, a written acknowledgment by the Client Management team of the Company should be sent to You **within five (5) days** confirming the receipt of Your complaint and the estimated time under which the Client shall be given a reply and providing the URN as mentioned above.

The URN shall be used in all future correspondence with the Company, CySEC and Financial Ombudsman. Once the written acknowledgment is sent, Your complaint will be escalated to the Company's Compliance department for further evaluation.

6.2. It is to be noted that Clients can submit complaints to the Company, free of charge. When handling a Complaint, this should be communicated to the Client clearly, in plain language that is easy to understand, and the Company shall reply to the Complaint without undue delay.

6.3. The Company usually aims to resolve your Complaint as soon as practically possible following receipt of the Complaint. However, in order to help us investigate and resolve the Client's Complaint as quickly as possible and with the minimum inconvenience to the Client, the following information is requested and submitted with the submission of the Complaint Form included in Appendix A:

- The Client's full name, address and trading account number;
- A clear description of the Complaint, including dates, trading positions and any relevant details;
- The damage claimed by the Complainant;
- Copies of any relevant documents, such as letters (i.e. correspondence exchanged between the Company and the Complainant); and
- A daytime telephone number where we can contact the Client.

6.4. The Compliance Department will issue a final response **within two (2) months** of the Complaint logged date setting out the outcome/decision of the investigation.

6.5. The Company's officers shall analyse Complaints and Complaints-handling data to ensure that they identify and address any risks or issues.

6.6. During the investigation process, the Company will keep You updated of the handling process of Your Complaint.

6.7. The Company has established a Complaints Committee, that is also responsible for reviewing the Complaints-handling process, advising the Board of Directors the necessary amendments to the CMP, reviewing the Complaints and ensuring that

Complaints are investigated fairly, and any possible conflicts of interest are identified and mitigated.

- 6.8. In the case that the Company is not able to respond within two (2) months, we should immediately inform the Complainant in writing or any other durable medium about the reasons for the delay and indicate when the Company believes will be in a position to provide an outcome/decision.

This time period cannot exceed three (3) months from the period of submission of the Complaint.

- 6.9. **Please note that the Company shall consider the Complaint as closed when a period of three (3) months has elapsed from the date of submission of the Complaint and the Client has failed to respond to the Company's officers' requests and due to this, the investigation cannot be carried forward.**

- 6.10. **When the Company sends the final response to the Client, the Client shall be given a period of two (2) months to respond.**

If a response is not received within the timeframe as indicated above, then the Company shall consider the Complaint as settled and shall not be obliged to take the Complaint further, unless further correspondence is received from the Client indicating that (s)he is still dissatisfied with the Company's final response.

- 6.11. If the Client is not satisfied with the outcome of the final response or in the instance where no response is received in the three (3) months' timeframe, the Client has the right to address his/her Complaint to the [Financial Ombudsman of the Republic of Cyprus](#) as outlined below:

The Financial Ombudsman Service

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

Email: complaints@financialombudsman.gov.cy

By hand or by post to the address: 15 Kypranoros, 1061 Nicosia or P.O. Box. 26722, 1647 Nicosia

Telephone: +35722848900

Fax: +35722660584, +35722660118.

- 6.12. Alternatively, You may submit Your Complaint to [CySEC](#).

- 6.13. It is understood that a Client's right to take legal action remains unaffected by the existence of use of any Complaint procedures referred to above. In addition, if the Client remains dissatisfied with the Final Response of the Company or in case of no Final Response within the three (3) months' timeframe, he/she may be entitled to take his/her complaint to the Financial Ombudsman of the Republic of Cyprus, by quoting his/her Complaint's unique reference number.

- 6.14. 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.
- 6.15. Kindly note that any dispute arising shall be subject to the exclusive jurisdiction of the Cyprus Courts.

7. Record Keeping

- 7.1. All decisions related to Complaints shall be communicated to Complainants in writing and copies shall be retained by the Company.
- 7.2. All the documentation related to Complaints shall be maintained for a period of at least five (5) years after the execution of the Complaint and/or termination of the business relationship with the Client.

8. Appendix A

Complaint Form		
<p>Complete, up to date as well as accurate information is required to be provided to StoneX Europe Ltd, for the proper investigation and evaluation of your complaint. Please note that the below Complaint Form is only indicative and not exhaustive.</p> <p>StoneX Europe Ltd may request further information and/or clarifications and/or evidence as regards your complaint. Moreover, StoneX Europe Ltd may request from you to re-submit a new Complaint Form in the case it considers that you have incorrectly and/or falsely completed your Complaint Form. StoneX Europe Ltd will try to resolve your complaint on the basis of good faith, fairness and by taking such action as is consistent with market practice.</p>		
Client Details		
1.	Title:	
2.	First Name:	
3.	Last Name:	
4.	ID or Passport Number:	
5.	Nationality:	
6.	Mobile Phone Number (include the country code):	
7.	Work phone number:	
8.	Email address:	
9.	Residential Address (Address/City/State-Province/ ZIP code/ Country):	
Complaint Details		
10.	Trading Account Number(s):	
11.	Please provide a summary of your complaint in the space provided below. Please try to justify the disputed amount and/or to include details that will facilitate the Company in investigating your complaint. Please use a separate sheet if necessary.	

12.	When did the issue are you complaining about take place (DD/MM/YYYY)?	
13.	When did you first notice that there might be a problem (DD/MM/YYYY)?	
14.	Have you communicated your complaint previously to StoneX Europe Ltd and/or its associates (Yes/No)?	

15.	If your answer to question 14 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:	
15.1	Please enter the date (DD/MM/YYYY)	
15.2	StoneX Europe Ltd Representative's Name and email address	
15.3	Method of Communication.	
15.4	Have you reported your complaint to any authority (YES/NO)?	
15.5	Please complete if your answer to point 15.4 is 'Yes' – please state which financial authority have you contacted.	
16.	Please attach with this form any supporting evidence to your claim that will facilitate the Company's investigation of your complaint. Supporting evidence may consist of any documentation (screenshots, chats, phone records etc) relevant to the complaint.	
17.	I hereby certify and confirm that to the best of my knowledge, the information furnished above is true, accurate, correct and complete (please tick the box). <input type="checkbox"/>	
Signature.....		
Date.....		
FOR OFFICIAL USE ONLY		
18.	Received on:	
19.	Received by:	
20.	Assigned to:	
21.	To reply by:	