



ZX Capital Markets Ltd

Complaint Handling Policy and Procedures

ZX Capital Markets Ltd (Saint Lucia)
Registered in Saint Lucia under company number 2023-00378
Unit 1, La Place Creole, Rodney Bay Village, Gros-Islet, Saint Lucia

Table of Contents

1.	Introduction	2
2.	Definitions.....	2
3.	Submitting a Complaint	3
4.	Registration of Complaints.....	4
5.	Managing Complaints	5
6.	Disputes with Customers and participants	5
7.	External dispute resolution options	5
8.	Response to Complaints.....	6
9.	Monitoring of Complaints	6
10.	Settlement of Disputes.....	6

1. Introduction

ZX Capital Markets Ltd with the trade name ('ZXCM') is a company registered in Saint Lucia, (hereinafter 'the company'). The Company is registered under company number 2023-00378 with its registered offices at Ground Floor, The Sotheby Building, Rodney Village, Robney Bay, Gros-Islet, Saint Lucia.

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.

The Company maintains Records of Complaints and a structured dispute resolution process. The Company will must develop and put into practice an independent and objective complaints and dispute resolution system that includes:

- a. A written Policy that sets out how complaints and disputes will be handled, including:
 - i. How to lodge a complaint or dispute regarding the Company actions or decisions;
 - ii. Time frames for decisions regarding complaints;
 - iii. Information to be provided to complainants;
 - iv. Options available when a complaint or dispute is not resolved
- b. Effective communication of the Company Complaint Handling and Dispute Resolution Policy to clients
- c. Complaints register that records details of complaints and disputes and their progress;
- d. Referral arrangements to external dispute resolution resources for disputes that cannot be resolved through the internal resources of the Company

2. Definitions

A. Client

- i. Any person that is registered with the Company.

B. Complaint:

- i. Complaints are defined as specific requests or claims related to the performance, services or products of the Company, which objects the performance or expresses negligence of the Company and lodges a relevant, specific and clear demand.
- ii. Asking an opinion or position about any specific case or requesting general information about the operation and services of the Company shall not constitute a complaint.
- i. An official complaint is only received by e-mail at support@zxcn.com and complaints@zxcn.com.

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C. Complainant:

- i. The Complainant could be a natural or legal person, a company without legal entity or other organization that requires services of the Company or the addressee of information or offer related to the service.
- ii. A person who lodges an official complaint through e-mail to support@zxcn.com and complaints@zxcn.com.
- ii. When the complaint is submitted by a representative or other duly authorized person, the Company will investigate the legal basis of the submission, which must be presented by the Complainant in a format required by law. If no authorization is available, the Company will approach the Complainant directly in order to accelerate the procedure.

D. Dispute

Means an unresolved complaint. In other words, it is a matter that has been dealt with as a complaint under this Policy, but where the complainant is still not satisfied with the outcome.

E. Dispute Resolution

Dispute resolution refers to the processes by which disputes are brought to an end. This can occur through:

- i. A negotiated outcome, where the parties concerned sort out things themselves;
- ii. A mediated outcome, where the parties use the services of an independent mediator to help them arrive at their own agreement; or
- iii. An arbitrated or adjudicated outcome, where an independent arbitrator or court determines how the dispute is to be resolved and makes a binding decision or order to this effect

F. Support Issue

- iii. Any issue that was made known to the Company through customer support.
- iv. Any issue that did not arrive through email to support@zxcn.com and complaints@zxcn.com.

3. Submitting a Complaint

The Complainant, if possible, should report the event or the date of the occasion subject of the complaint to the Company as soon as possible. This is necessary to enable the Company to investigate the complaint as efficiently as possible.

- i. A complaint will only be considered as being official, if the complainant sends the complaint by e-mail to: support@zxcn.com and complaints@zxcn.com.

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The following opportunities are also available to clients for submitting a support issue to our Company:

- i. by mail,
- ii. by telephone,
- iii. in writing, or
- iv. verbally, both delivered personally.

Please note that if any of the alternative options above is used to bring a support issue to the Company attention, then the support issue will be handled as a support ticket.

- i. Employees of the Customer Service can assist the Complainant in compiling and submitting the complaint. The Complainant must submit complaints related to services rendered on the basis of the online trading agreement to support@zxcn.com and complaints@zxcn.com.

For any other support issues, the client may contact Customer Service of the Company. Contact of the Customer Service is available at the homepage of the Company all the time.

The telephone line of the Customer Service is available for any issues by telephone. If the client calls another telephone number of the Company, he/she will be redirected to the Customer Service. the Company shall provide 24 hours direct telephone line to the Customer Service.

4. Registration of Complaints

- v. The Company shall register all complaints received at support@zxcn.com and complaints@zxcn.com. they are dealt with. This register shall record at least the following information:
 - i. description of the complaint,
 - ii. description of the event or fact subject of the complaint,
 - iii. date of submitting the complaint,
 - iv. measures implemented to settle or solve the complaint,
 - v. in case of rejection, the reasoning of the rejection,
 - vi. deadline of managing the complaint,
 - vii. name of the person responsible for the execution,
 - viii. date of responding to the complaint.

The Company pays special attention to avoid collection of data about the client with the exception of recording data aimed to settle a complaint. All personal particulars obtained in relation to managing the complaint shall be deleted from records or made unsuitable for identification. The Company manages complaints within a transparent

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system; they could be traced and administered in each and every stage of the procedure.

The Company records all telephone conversations between the Customer Service and the client regarding any support issues and keeps the voice record for the period of one year. The client shall be informed about this at the beginning of the conversation. The Company shall make this record available for listening to the client.

5. Managing Complaints

The Company manages all complaints and Complainants equally, without any discrimination, in harmony with the procedure regulated by this Policy.

6. Disputes with Customers and participants

To maximize the chance of a successful resolution the Company will:

- a. Listen to what the complainant has to say
- b. Request documentary evidence if required to verify the facts;
- c. Understand the Company legal obligations seeking advice from the relevant consumer organization depending on the nature of the dispute;
- d. Provide accurate information on the options available to the complainant for resolution of the issue.

7. External dispute resolution options

The Company will have the available options for external dispute resolution and the appropriate option for any particular dispute. Successful use of external dispute resolution will involve a number of steps, as set out below:

Step 1 - Understand the Dispute

Step 2 - Understand Dispute Resolution Options

Step 3 - Select the Appropriate Dispute Resolution Method

Step 4 - Access an Alternative Dispute Resolution Provider

Step 5 - Prepare for the Alternative Dispute Resolution Process

Step 6 - Working Towards a Successful Resolution Outcome

A) Customer Service

If possible, all support issues must be settled without delay. If immediate settlement of a verbal support issue is not possible or the client rejects the solution offered on the spot, an employee of the Company shall record the complaints and the Company position in a memorandum and forward them to Customer Service, unless the support issue was submitted directly to Customer Service. Similarly, Company employees forward all support issues submitted in writing to Customer Service. Customer Service shall be responsible for settling complaints. The officers of the Customer Support Department will inform you of the appropriate process to follow.

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If you are contacting us on behalf of another person, we may ask you to provide proof of that person's consent to your handling of their Complaint. We aim to resolve the matter within five

(5) business days depending on the nature of the complaint and ensure that the maximum time to respond to complaints does not exceed 30 days.

B) Compliance Officer

If employees at Customer Services are unable to settle the issue efficiently or within a short period of time (48 hours), they forward it to the Compliance officer of the Company. The client, if he/she does not accept the solution offered by Customer Service, is also entitled to approach the Compliance officer directly.

c) Directors of the Company

Within the organization of the Company, Directors of the Company represent the highest level of authority in deciding the settlement of complaints. Directors of the Company shall settle those complaints which cannot be managed with the procedures mentioned in this document; they shall take into account the opinion of the Compliance officer of the Company.

8. Response to Complaints

The Company follows the outlined procedures to ensure that your Complaint is resolved within a period of thirty (30) business days. This response, including the reasoning, is always mailed to the Complainant. Some Complaints can be resolved more quickly depending on the facts and the nature of the Complaint. If the Complaint is more complex and takes longer than thirty (30) business days to resolve, we will communicate the reasons for the delay. Sometimes you are requested to supply additional information required for investigating the complaint. In this case, please respond at your earliest convenience.

9. Monitoring of Complaints

After settling the procedure, the Company shall preserve every written or electronic document related to complaints for a period of 7 years. The Company shall be entitled to prepare statistics and reports about complaints, which will be aimed to improve the efficiency of administering complaints.

10. Settlement of Disputes

When disputes between the Company and the Complainant cannot be settled by the official procedure, the Complainant may use a third-party dispute resolution provider, should one be available to them. The Company will do its best to resolve all disputes in a fair and honest manner.

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