

Complaints or Grievances Policy

Exinity UK Ltd

Version 2.0 June 2021

TABLE OF CONTENTS

1. INTRODUCTION	3
2. DEFINITIONS.....	3
3. SCOPE.....	3
4. PROCEDURE.....	3
HOW TO SUBMIT A COMPLAINT.....	4
HOW THE COMPANY WILL HANDLE THE COMPLAINT.....	4
DETAILS REQUIRED FOR EACH COMPLAINT.....	5
5. RECORD-KEEPING OF COMPLAINTS OR GRIEVANCES RECEIVED	5
6. SUBMISSION OF COMPLAINTS TO FINANCIAL OMBUDSMAN SERVICE	6

1. INTRODUCTION

Exinity UK Ltd (Company) is authorized and regulated by the Financial Conduct Authority (FCA) with registration number 777911. The Company's business address is at 1 St Katharine's Way, London E1W 1UN.

2. DEFINITIONS

"Complainant" means any person, natural or legal, which is eligible for lodging a complaint to the Company and who has already lodged a complaint.

"Complaint" means any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of, a person about the provision of, or failure to provide, a financial service or a redress determination.

3. SCOPE

The purpose of the Complaints or Grievances Policy (Policy) is to set out the procedure to be followed and the appropriate action required to be taken by the Company in the case of a complaint by any client to ensure the Company's compliance with FCA Handbook DISP 1.1A "Complaints handling requirements for MiFID complaints" and DISP 1.3 "Complaints handling rules"

The Company shall establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints or grievances received from, or on behalf of, clients, and to keep a record of each complaint or grievance and the measures taken for the complaint's resolution.

The Company is required to:

- Apply a complaints management policy, which is defined and endorsed by the senior management and the board of directors, who will be responsible for its implementation and for monitoring the Company's compliance with it.
- Ensure that it has procedures, which enables complaints to be investigated fairly and possible conflicts of interest to be identified and mitigated.

4. PROCEDURE

The Company will take the following steps to ensure your complaint is dealt with in the appropriate manner:

1. The Company will contact you within 24 hours (during business days only Mon – Fri) of receiving the complaint confirming receipt and who will be your point of contact at the Company.
2. The Company will thoroughly investigate the basis and circumstances surrounding your complaint.
3. The Company will then correct any errors on behalf of the Company after the investigation has been concluded.
4. The Company will contact you and let you know the outcome of our investigation
5. In some circumstances it may be possible for the Company to resolve less complex complaints within 3 business days. If this is not possible we will keep the complainant aware of the next stages within their complaint.

Clients' complaints or grievances are initially handled by the Compliance Function.

HOW TO SUBMIT A COMPLAINT

A complaint can be made orally or in writing.

Once the complainant files a complaint, the Company will provide to the complainant via email the following; confirmation that the complaint has been received, the person who will be the client's point of contact and a reference number of the complaint for future reference.

HOW THE COMPANY WILL HANDLE THE COMPLAINT

The procedure which shall be followed by the Company, when handling with clients' complaints or grievances, is the following:

- a. The employee receiving the complaint or grievance shall take the necessary actions so that the complaint or grievance is properly recorded and forwarded to the correct person.
- b. Within 24 hours of receiving the complaint a member of the Compliance Function shall send a written acknowledgement informing the complainant that the complaint or grievance is under investigation and that the complainant is aware of who is dealing with his/her complaint or grievance. Along with the letter, the Company's Complaints or Grievance Policy shall be provided to the complainant free of charge.

The Compliance Function, further to its independent capacity in the Company, will review the response prior to its dissemination to the Client in order to ensure its prompt, fair and clear handling.

The Company sets 5 business days from the day the original complaint is received as a standard investigation period. If the investigation is complete in less than 10 business days, the complainant will be informed about the results of the investigation immediately upon its completion. However, if a complaint is not resolved within the standard investigation period, the Company will inform the complainant in detail about causes of delay, status of the investigation process and expected date of completion of the investigation.

DETAILS REQUIRED FOR EACH COMPLAINT

- a. Upon receiving a written complaint or grievance, the following details should be obtained and recorded:
 - i. The identification particulars of any client having made a complaint or grievance;
 - ii. The service provided by the Company and related to the complaint or grievance;
 - iii. The name of the employee responsible for the provision of those services;
 - iv. The department where the employee belongs;
 - v. Date of receipt and registration of complaint or grievance;
 - vi. The subject and content of the complaint or grievance;
 - vii. The capital and the value of the financial instruments which belong to the client;
 - viii. The magnitude of the damage claimed by the client;
 - ix. Reference of any correspondent exchanged between the Company and the client.
- b. The events leading to the complaint or grievance should be examined and assessed based on the information provided by the client.
- c. The facts as stated by the client have been examined and verified whether any additional information, need to be retrieved from the Company's archive (electronic mail, recorded telephone calls, IT data, etc).
- d. Upon completion of the investigation a report shall be prepared stating the facts then brought to the Senior Management's attention. They will decide on the response to the client and the action to be taken.
- e. Upon investigation completion, a member of the Compliance Function shall inform the complainant in writing, that the complaint made is a MiFID complaint and that the Company considers the complaint to have been resolved; the results of the investigation and actions taken to satisfy the complainant's demand(s). The letter to the complainant shall inform the complainant that if he is dissatisfied with the resolution of the MiFID complaint, he may be able to refer it to the Financial Ombudsman Service; as well as providing the website of the Financial Ombudsman.

In the case where a client complaint or grievance is valid, the management shall take such necessary action together with the Head of Department(s) to which the complaint or grievance is related in order to identify and verify:

- a. Reasons for failure of procedure followed;
- b. Weaknesses of the internal controls;
- c. Implementation of internal controls that would prevent any complaint or grievance in the future.

All suggested procedures shall be approved by Senior Management at the meeting following the completion of the investigation.

5. RECORD-KEEPING OF COMPLAINTS OR GRIEVANCES RECEIVED

The responsible department for the record keeping of complaints or grievances received is the Compliance Function. In particular, the Compliance Officer, or his/her designee, will keep a record of each complaint and the measures taken for the complaint's resolution. All decisions related to complaints shall be communicated to complainants in writing and copies shall be retained by the Compliance Function.

Exinity UK Ltd.

1 St Katharine's Way, London E1W 1UN

Phone +44 203 514 1251 | Email: info@forextime.co.uk | Web: www.forextime.com/uk

Authorised and Regulated by the Financial Conduct Authority. Register No. 777911

Registered in England and Wales No. 10599136

The complaint shall be registered once it is received on an internal archive and in an appropriate manner. The Compliance Officer, or his/her designee, shall maintain a central record of all complaints that includes the following information:

- a. name, address and account number (if available) of the complainant;
- b. date on which the complaint was received;
- c. department(s) involved the complaint investigation along with the names of the responsible employees;
- d. description of the nature of the complaint;
- e. disposition of the complaint.
- f. further communication with the client with respect to the complaint.

The Company is required to submit information regarding the complaints received to the FCA twice per year.

The Company shall maintain all the documentation related to complaints for a period of at least five (5) years calculated after the execution of the complaint and/or termination of the business relationship with the Client.

6. SUBMISSION OF COMPLAINTS TO FINANCIAL OMBUDSMAN SERVICE

If the Complainant is dissatisfied with the final response they receive from the Company or if the Company fails to resolve their complaint within eight (8) weeks of the receipt of the complaint, the complainant has the right to refer their complaint to the Financial Ombudsman Service, but they must do so within six (6) months of the date of the final response sent by the Company.

Details of how the Complainant can contact the Financial Ombudsman Service and a link to their explanatory leaflet will be supplied at the same time as the Company's final response or is available upon request. The Financial Ombudsman Service contact details are:

Financial Ombudsman Service

Exchange Tower, London E14 9SR

Telephone 0800 023 4567

E-mail: complaint.info@financial-ombudsman.org.uk

Website www.financial-ombudsman.org.uk

Contact the UK Financial Ombudsman Service via email, or access a copy of the UK Financial Ombudsman Service explanatory leaflet here:

<http://www.financial-ombudsman.org.uk/publications/consumer-leaflet.htm>

The Company's Retail Clients and any person(s) acting for purposes wholly or mainly outside their trade, business, craft or profession are considered Eligible Complainants and, therefore, will have the right to refer their complaint to the Financial Ombudsman Service.

Exinity UK Ltd.

1 St Katharine's Way, London E1W 1UN

Phone +44 203 514 1251 | Email: info@forextime.co.uk | Web: www.forextime.com/uk

Authorised and Regulated by the Financial Conduct Authority. Register No. 777911

Registered in England and Wales No. 10599136