

# CLIENT HANDLING PROCEDURE

Anzo Capital Limited is a well-capitalized firm regulated by International Financial Services Commission (IFSC), IFSC licence no. IFSC/60/482/TS/19).

## 1. INTRODUCTION

ANZO CAPITAL LIMITED (hereinafter the “**Company**”) is registered in 1 Mapp Street, Belize City, Belize C.A., a financial services company providing trading in financial and commodity-based derivative instruments and other securities, licensed by the International Financial Services Commission under registration number IFSC/60/482/TS/19 (<http://www.ifsc.gov.bz/licensed-service-providers/list-f/>).

Under the operating conditions of the IFSC, the Company is required to have in place and disclose to its Clients and potential Clients a Complaints Handling Procedure (hereinafter “**the Policy**”), which is described in this document.

The policy forms part of the Client's agreement, namely, the Terms and Conditions Agreement with the Company, thus the Client is also bound by the terms of this policy, as set out herein.

## 2. SCOPE

The policy sets out the method for the submission of complaints with the Company from its Clients and the processes taken by the Company when dealing with such complaints in order to solve potential inconveniences that might occur among the business relation.

## 3. DEFINITION OF A COMPLAINT

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

### 3.1. Required information

The Client shall provide the Company with the following information in relation to the complaint:

- a. The Client's name;
- b. Contact information;
- c. Account identification number;
- d. The time of the circumstances constituting the basis of the complaint;
- e. Identification numbers or relevant orders and positions;
- f. A description of violation;
- g. A clear claim, and, if possible, documents in the form of documents supporting such claim.

## 4. PROCEDURE

### 4.1. Submitting Complaints

The complaint must be directed by the Client to the Company by filling the relevant forms (Form in Appendix 1 for Trading Operations complaints, and Form in Appendix 2 for Non Trading Operations complaints) and submit to the Company by email: [support@anzocapital.com](mailto:support@anzocapital.com). In case the Company receives a notice through the line of communication established by the Company to receive complaints, but which does not fall within the definition of ‘complaint’ above and can be characterized as an enquiry; this shall be categorized as an enquiry rather than a complaint and will be forwarded to the relevant department to be handled accordingly. The complainant maintains the right to request for the re-classification of this enquiry as complaint.

### 4.2. Receiving Complaints

Following the receipt of the complaint, by the Company, the Head of the Administration/Back Office Department shall confirm to the respective Client the receipt of the complaint via email within five (5) working days from the moment of a complaint is received and commence actions to resolve the complaint.

Personnel of the Administration/Back Office Department may contact the Client directly in order to obtain further clarifications and/or information in relation to the complaint. The Client's cooperation is required for the handling of the complaint in question.

### 4.3. Handling Complaints

The Head of the Administration/Back Office Department is responsible for handling customer complaints. Their duties include the effective and efficient handling of customer's complaints so as to enable the Company to adopt and apply the required actions to prevent the repetition of the same complaints.

Following the receipt of the complaint, by the Company, the Head of the Administration/Back Office Department shall confirm receipt of the Client's complaint

In the event that the issue has not been resolved within five (5) working days, or if the remedy measure involves actions by other departments, then the Head of the Administration/Back Office Department shall communicate the Client's complaint or grievance to the Head of Compliance. At the same time, the Client shall be informed about the delayed resolving of the complaint in a format, which can be reproduced in writing, informing him of the new timeframe for response to the complaint, which should be expected four (4) weeks since the receipt of the complaint and also informing the Client that the Company will ensure that the complaint or grievance is resolved within eight (8) weeks from its receipt.

The Head of Compliance shall review carefully the details of the Client's complaint or grievance brought to him. Once the Head of Compliance understands fully the nature of the Client complaint or grievance, he may also communicate with the Client, to understand fully the nature and implications of the complaint or grievance, as applicable. At the same time, the Head of Compliance shall investigate and co-ordinate any relevant Heads of the Departments related to the Client complaint or grievance, until it is satisfactorily resolved.

It is understood that the Client's right for legal action remains unaffected by the existence or use of any complaints procedures referred to herein.

Additionally, in case where the Company's final decision in regards to the complaint does not fully satisfy the Client's demands, the Company will notify the Client in writing explaining the Company's position on the respective position.

#### 4.4. Records and Measures

The Company shall maintain effective and transparent procedures for the prompt handling of complaints or grievances received from Clients. The Company shall keep a record of each complaint or grievance as well as the measures taken for the complaint's/grievance's resolution.

The Compliance Department shall maintain all complaints, all relevant correspondence and documents related to complaints, for a minimum period of five (5) years.

One copy of the complaint form is archived in the client's file and another copy is kept in a separate file ("Complain/Grievance File")

At the end of each month the General Manager inspect the "Complain/Grievance File" and ensures that the Heads of the departments have taken all the required actions so as to prevent repetition of the same complains/grievances.

The General Manager shall inform at least once a year the Board of Directors of all complaints/grievances received.

#### 4.5. Principles of the procedure

- a. All complaints shall be treated confidentially;
- b. The Company shall deal with Client's complaints without undue delay;
- c. The company will resolve all complaints in a fair manner;
- d. At the Client's request the Company shall provide reasonable assistance for the formalization of complaints in the form of general guidelines;
- a. A complaint must not include offensive language directed either to the company or to its personnel;

### 5. MONITORING OF COMPLAINTS

5.1. The Company will keep detailed documentation on individual Complaints.

5.2. Private Information will not be shared with any Third Parties.

5.3. These details will usually include as a minimum:

- a. The Nature, Date and Method of Communication of the Complaint;
- b. The Complainant's details;
- c. How the Complaint was dealt with (outcomes);
- d. Whether the Complaint was upheld or refuted;
- e. Whether the Complaint was closed, (addressed to the Complainant's satisfaction), or whether it remains open and outstanding;
- f. What Financial Redress or other significant outcome resulted from the Complaint

### 6. THE COMPANY'S RIGHT TO PROCEED WITH THE RECOVERY OF DEBTS

6.1. The above Complaints Handling Procedure does not apply to money that you may owe to the Company

6.2. The Company may take immediate action to recover any debts payable to the Company in Court or otherwise.

### 7. INTERIM RELIEF

7.1. Nothing set forth herein shall prevent either Party from applying to Court for interim or injunctive relief.

### 8. AMENDMENT/REVIEW

The Company will not be obliged to notify its Clients individually of changes, other than substantial material changes to the policy. Thus, the Clients should refer to the Company's website for the latest and most up to date version of the Policy, which will be applicable from the date of publication on the web.

## 9. Compliant Forms

### Appendix 1

#### Type: Trading Operations

Name

Surname

Email  Account Number

Date/Time of the disputed situation (in EET, MetaTrader server time)

Number of all contested positions and/or pending orders

Brief description of disputed situation:

How you feel this dispute could be settled:

**Please accompany this form with a screenshot of your Trading Terminal if you feel it would further support your claim request.**

## 9. Compliant Forms

### Appendix 2

#### **Type: Non-Trading Operations**

Name

Surname

Email  Account Number

Date/Time of the disputed situation (in EET, MetaTrader server time)

Brief description of disputed situation:

Clause(s) in the regulations on Non-Trading Operations, which in the complainants opinion, have been breached:

How you feel this dispute could be settled:

**Please accompany this form with a screenshot of your Trading Terminal if you feel it would further support your claim request.**