

COMPLAINTS HANDLING POLICY

INTRODUCTION

JFD Group Ltd operating under the trading name JFD Brokers is a Cypriot Investment Firm ("CIF") registered with the Department of Registrar of Companies under number HE 282265, is authorised and regulated by the Cyprus Securities and Exchange Commission - CySEC (Licence number: 150/11) and is a Member of the Investor Compensation Fund (ICF). JFD Group Ltd is registered with the German Federal Financial Supervisory Authority - BaFin (Registration number: 126399), the British Financial Conduct Authority - FCA (Registration number: 580193), the French Autorité de Contrôle Prudentiel et de Résolution - ACPR (Registration number 74013) and is MiFID compliant under the Investment Services and Regulated Market Law of 2007 (Law number: 144(I)/2007). JFD Group Ltd is licenced to provide the investment services of Agency Only Execution (i.e. reception and transmission of orders, execution of orders on behalf of clients) and Portfolio Management in relation to Transferable Securities, Options, Futures, SWAPS, Forward Rate Agreements, Financial Contracts for Differences (CFD) and other Derivatives. JFD Group Ltd is also licenced to provide the ancillary service of Safekeeping and Administration of Financial Instruments. JFD Group Ltd and/or any of its subsidiaries are operating under the "JFD Brokers" trading name (hereinafter "the JFD Brokers").

GENERAL

JFD Group Ltd (herein "**the Company**" or "**JFD**" or "**JFD Brokers**") maintains effective and transparent procedures for the reasonable and prompt handling of complaints or grievances received from retail or professional clients and keeps a record of each complaint or grievance and the measures taken for the complaint's resolution.

For the purposes of this Policy:

«*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 a statement of dissatisfaction addressed to the Company by a complainant relating to the provision of investment services.

The complaints must be submitted to the Company via the following methods:

- a. By email: support@jfdbrokers.com
- b. By post or in person at the Company's Headquarters

Clients' complaints or grievances are initially handled by the Customer Support Department. However, the final settlement of complaints or grievances is approved by the Compliance Department.

Upon receiving the complaint, the Company must register the complaint directly to an internal register, giving it a unique reference number.

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www.jfdbrokers.com

HANDLING PROCEDURE

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

- A complaint is initially handled by a member of the Customer Support Department. The employee receiving the complaint confirms within 5 days the receiving of the complaint to the complainant, so that the complainant is aware that his complaint is currently under investigation and communicates to the complainant the unique reference number of his complaint to use for all future contact with the Company, the financial ombudsman or CySEC.
- Furthermore, the employee takes all the necessary actions and addresses the complaint with its unique reference number to the relevant Department where the complaint is addressed. The Customer Support Department with the relevant Department should make all best efforts to ensure that in case the complaint is being of such a nature that can be resolved immediately, to do so that the client will be satisfied and will not have to pursue the filling of a formal complaint.
- Upon receiving the written formal complaint, the Customer Support Department shall forward to the Compliance Department and accordingly the Compliance Department shall commence the investigation by forwarding the complaint to the head of the department where the complaint is addressed.
- The following details should be obtained and recorded: The events leading to the complaint should be examined and assessed based on the information provided by the client.
 - The identification particulars of any client having made a complaint.
 - The service provided by the Company and related to the complaint.
 - The employee responsible for the provision of those services.
 - The department where the employee belongs.
 - Date of receipt and registration of complaint.
 - Content of the complaint.
 - The magnitude of the damage claimed by the client.
 - Reference of any correspondent exchanged between the Company and the client.
- The facts as stated by the client are examined and verified and whether any additional information needed, these are retrieved from the Company's archive (electronic mail, recorded telephone calls, IT data, etc).
- Upon completion of the investigation, a response is prepared by the Compliance Department, brought to Management's attention and Management gives the final approval for the formal response to the client and the actions to be taken.
- The Company shall provide a response to the complainant within two months from the date the complaint was received. If the Company is unable to respond within two months, it informs the

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complainant of the reasons for the delay and indicates when the Company's investigation is likely to be completed. If needed, during the investigation of the complaint, the Company informs the Complainant of the handling process of his complaint.

- The Company shall document and keep in its records the following information:
 - the identity of the complainant
 - the name of the employee who undertook to provide the service to the complainant
 - the date of receipt of complaint
 - the subject and full description of the complaint
 - the resolution and action taken, and/ or further clarifications provided to the complainant

RECORD KEEPING OF COMPLAINTS RECEIVED

The Company shall maintain all complaints for a minimum period of five years. The responsible departments shall be the Compliance Department and the Customer Support Department.

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