



# TRADE MARKETS

## COMPLAINTS HANDLING POLICY

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**Trade Markets is owned and operated by NBH Markets EU Ltd**

Ver. 2

NBH Markets EU Limited is a Cyprus Investment Firm, regulated by Cyprus Securities and Exchange Commission (CySEC) License Number: 208/13 and Registration Number: HE 291974  
Registered Office Address: Agias Zonis & Thessalonikis, 1, NICOLAOU PENTADROMOS CENTER, Floor 7, Office 701-704, 3026, Limassol, Cyprus

## **INTRODUCTION**

The Complaints Handling Policy (hereinafter, “the Policy”) outlines the procedures followed when dealing with complaints received from Clients. NBH Markets EU Ltd (hereinafter, “the Company”) undertakes to maintain effective and transparent procedures for the reasonable and prompt handling of Complaints received.

The Policy is an integral part of the Client Agreement and contains information on how the Company manages any complaint which may arise in the course of the business relationship.

## **DEFINITION OF A COMPLAINT**

A Client complaint is an expression of dissatisfaction by a Client regarding the provision of investment and/or ancillary services by the Company. A complainant is any person, natural or legal person who is presumed to be eligible to have a complaint considered by a firm and who has already lodged a complaint. 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 the re-classification of his enquiry as a complaint.

This Policy is in addition to the Company’s overarching general obligation to act honestly, fairly and professionally and in the best interests of its Clients and to comply, in particular, with the principles set out in the above legislation when providing investment services and other ancillary services.

## **SUBMISSION OF THE COMPLAINT**

The Clients wishing to submit a complaint as a result of his/her dissatisfaction with the investment services offered by the Company are advised to submit it via email to [compliance@trademarkets.eu](mailto:compliance@trademarkets.eu) or via post to 214 Agias Zonis & Thessalonikis, 1, NICOLAOU PENTADROMOS CENTER, Floor 7, Office 701-704, 3026, Limassol, Cyprus.

The official complaint must include the following:

1. The Client’s name and surname
2. The Client’s trading account number
3. The affected transaction numbers (if applicable)
4. The date that the issue arose
5. An accurate description of the issue
6. The damage claimed by the Complainant

## **ACKNOWLEDGMENT OF COMPLAINT**

The Company will acknowledge receipt of the Complaint within five (5) working days from the day of receipt of the Complaint, indicating that the Complaint is acknowledged and provide the Client with a unique reference number of the complaint.

The unique reference number should be used in all communications with the Company regarding the Complaint, the Financial Ombudsman and/or CySEC regarding the specific complaint.

## **HANDLING OF COMPLAINTS**

Upon acknowledgment of receipt of the complaint, the Compliance Department will review it carefully, investigate the circumstances surrounding the complaint and attempt to resolve it without undue delay and to issue a final decision within two (2) months from Company's receipt of the complaint, depending on the complexity of the case and the Client's cooperation.

During the investigation process, the Compliance Department will inform the Client whether the complaint has been successfully resolved or whether further clarifications and information relating to the complaint may be required from the Client within the two (2) months' time-frame, as necessary.

When an outcome/decision is reached, the Company will inform the Client together with an explanation of the position and any remedy measures it intends to take (if applicable). Please note that the Company shall only communicate directly with the Client without any authorised representatives being involved.

In the event that the complaint requires further investigation, the Company will not issue a final decision within two (2) months but will indicate the causes of the delay and inform the Client that the final decision will be issued no later than three (3) months from the day that the Company received the submission of the complaint. A Complaint will be deemed as resolved or settled where the Company has sent in writing a Final Response and/or further clarifications on the Final Response to the Complainant.

During the investigation, the Compliance Department may contact the Client directly to obtain additional information. In case the Client fails to respond to enquiries regarding the complaint within the period of three (3) months from the date of the submission of the complaint, the Company will consider the complaint as closed.

## **FINAL DECISION**

When the Company reaches an outcome, it shall inform the Client together with an explanation of its position and any remedy measures the Company intends to take (if applicable).

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If the Client is not satisfied with the Company's final decision, he/she may submit the complaint to the Financial Ombudsman of the Republic of Cyprus and seek mediation for possible compensation. It is important that the Client contacts the Financial Ombudsman of the Republic of Cyprus within four (4) months of receiving our final response from the Company, otherwise the Financial Ombudsman of the Republic of Cyprus may not be able to deal with the complaint.

## **RECORD KEEPING**

The Company shall maintain a record of every complaint received from clients with details of the investigation conducted, the final outcome as well as of the measures taken for the resolution of the said complaint.

The Compliance Department shall maintain the appropriate records, the relevant correspondence and documents related to the complaints and shall regularly monitor and review the Company's compliance with the applicable regulatory requirements for handling Client Complaints and the record-keeping held.

### **Contact details of the Financial Ombudsman of the Republic of Cyprus:**

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

**Email:** [complaints@financialombudsman.gov.cy](mailto:complaints@financialombudsman.gov.cy)

**Postal Address:** P.O. BOX: 25735, 1311 Nicosia, Cyprus

**Telephone:** +35722848900

**Fax:** +35722660584, +35722660118

In the unlikely event that the Company was unable to provide you with a final response within the three (3) month time period specified above, you may again contact the office of the Financial Ombudsman of the Republic of Cyprus no later than four (4) months after the date when we ought to have provided you with our final decision.

### **Contact details of the Cyprus Securities and Exchange Commission:**

**Website:** <http://www.cysec.gov.cy>

**General Email:** [info@cysec.gov.cy](mailto:info@cysec.gov.cy)

**Postal Address:** 19 Diagorou Street, 1097 Nicosia, Cyprus

**Telephone:** +35722506600

You may maintain your complaint with the Cyprus Securities and Exchange Commission, however, please note that the Cyprus Securities and Exchange Commission does not have restitution powers and therefore does not investigate individual complaints.

It is understood that your right to take legal action remains unaffected by the existence or use of any complaint procedures referred to above.

## **RECORD KEEPING**

The Company shall document and keep in its records the following information:

- the identity of the complainant who filed the complaint
- the name of the employee who undertook to provide the service to the complainant
- the date of receipt of complaint/enquiry
- the subject and full description of the complaint/enquiry
- the remedial action taken, and/ or further clarifications provided to the complainant

## **ALTERNATIVE DISPUTE RESOLUTION**

Pursuant to Art. 26 para 5 of the Delegate Regulation (EU) No. 2017/565, the complainant might use an alternative dispute resolution entity as defined in Article 4(h) of Directive 2013/11/EU of the European Parliament and the Council on consumer ADR.

The European Commission has set up an online dispute settlement platform:

<https://ec.europa.eu/consumers/odr/main/?event=main.home2.show>

The online dispute settlement platform can be used by Clients for out-of-court settlement of disputes arising from sales contracts or service contracts concluded online