

TRADE MATCH LTD

Complaints Handling Policy

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Table of acronyms

CO	Compliance Officer
FSA	Seychelles Financial Services Authority

Table of definitions and interpretations

“Board” means the Board of Directors of **TRADE MATCH LTD**;

“Business Relationship” shall have the meaning set out under Section 2 of the Anti-Money Laundering and Countering the Financing of Terrorism Act, 2020;

“Client” refers to the person receiving services from **TRADE MATCH LTD** as outlined in the Client Service Agreement;

“Companies Act” means the Companies Act 1972;

“Company” shall mean **TRADE MATCH LTD** which is formed and registered in the Republic of Seychelles under the Companies Act 1972;

“Complaints” mean (i) 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 for action and/or (ii) any expression of dissatisfaction or concern about a service or product provided by the Company, or the conduct of the Company in the performance of any regulated activities, where a response or resolution is explicitly expected, shall constitute a complaint;

“Complainant” refers to the person making the complaint and includes a natural or legal person, a company without legal entity or other organization who acquires or intends to acquire financial services or products from the Company or the addressee of information or offer related to the service;

“Customer” shall have the meaning set out under Section 2 of the Anti-Money Laundering and Countering the Financing of Terrorism Act, 2020;

“Employee” means any natural person engaged by the Company under a contract of service whether expressed or implied, and whether on a full-time basis, part-time, fixed-term, or temporary basis, to perform work or services under the control, direction and supervision of

the Company. This includes, but is not limited to, persons performing managerial, executive, operational, administrative or support functions, irrespective of title or seniority. For the purposes of this Policy, the term 'Employee' encompasses all individuals whose work forms part of the Company's regulated and non-regulated activities.;

"Enquiry" refers to a request for information, clarification or an opinion about a specific case or general operation and services of the Company. Unlike complaints, enquiries are not expressions of dissatisfaction and do not involve requests for corrective actions. It is informational in nature and does not imply any failure or misconduct on the part of the Company;

"Enquirer" is the customer submitting an enquiry to the Company as per the above definition;

"Person" includes a natural person and a legal person;

"Policy" means **the Company's** Complaint Handling Policy;

"Republic" means the Republic of Seychelles;

"Resolution" is the structured process by which a complaint is addressed, investigated, and finalised in a manner that adheres to legal, regulatory, and internal compliance standards. It involves acknowledging the complaint, conducting a thorough review, and implementing appropriate actions. The resolution seeks to provide a fair and transparent outcome, guided by the findings of the investigation;

"Unique Reference Number" means Complaint Reference Number which is a unique identifier assigned to each complaint for tracking purposes.

"Vulnerable consumer" means a person, due to his or her personal circumstances, is susceptible to harm, particularly when the financial services provider is not acting with appropriate levels of care.

Words importing one gender include all other genders and words importing the singular include the plural and vice versa.

1. Introduction

- 1.1. **TRADE MATCH LTD** (the “Company”) is a Securities Dealer Licensee, regulated and authorized by the Seychelles Financial Services Authority under the license number **SD114**, with its registered address at **Office 12, 3rd floor, IMAD Complex, Ile Du port, Mahe, Seychelles**.
- 1.2. The Company is required to establish, implement and maintain an effective and transparent complaint handling policy and procedure for the prompt handling of Customers’ complaints.
- 1.3. In this respect, the Company has established this Complaints Handling Policy (the “Policy”) that sets out the process adopted by the Company for the fair and prompt handling of enquiries, complaints and disputes received from the Company’s Customers, as well as a robust framework comprising of, procedures, processes, controls and monitoring processes, to ensure the prompt handling of Customers’ complaints. This Policy describes, amongst others, the process that Customers will need to follow in order to submit a query and/or complaint to the Company.
- 1.4. The Company maintains Records of Complaints and measures taken for expedient complaint resolution, in line with applicable Legislation, Rules and/or Regulations.
- 1.5. The Company’s procedures and policies shall be reviewed on a yearly basis or as the need arises, in order to ensure that the Complaints Handling Process remains effective and up to date. Any necessary updates or changes to these procedures will be reflected in this Complaint Handling Policy, which will be available on our website at **www.gccmarkets.com** for reference. In addition, a copy of the complaint handling procedures shall be provided to all new customers at the time of establishing a customer relationship.

2. Complaint Handling Process

- 2.1. The Company's complaint handling procedures are accessible, independent, fair, accountable, timely and efficient. Complainants can file complaints and utilize these procedures free of charge.
- 2.2. The Company is mandated to carry out a root cause analysis on complaints received, so that larger issues may be identified and addressed, as well as, actions are taken to rectify the issue.
- 2.3. The Company ensures that the complaint handling process remains transparent, and that complaints handling staff declares any conflict of interest that arises pertaining to complaints received. If a conflict arises, another employee should be appointed to handle the case when possible. If the conflicted employee is the only available resource to handle the complaint, or has to eventually approve decisions made in relation to the complaint, the employee may still handle the matter as long as the conflict of interest is properly declared.
- 2.4. Confidentiality is a key aspect of the complaint handling process. The Company ensures that all complaints received from customers or their representatives are treated confidentially at all times.
- 2.5. The Company ensures that no complainant is subject to discrimination or penalisation for lodging a complaint.

3. Applicable Procedure for Submission of Enquiries and Complaints

3.1. Submitting an Enquiry

- 3.1.1. If the Customer has any enquiries regarding his account (hereinafter, the "Enquirer"), or requires clarification on the Company's services, in the first instance, the Enquirer should contact the Company's Customer Support Department via e-mail, telephone or any other official method of communication made available by the Company on its website, as the vast majority of enquiries and issues can be dealt with at this level.

- 3.1.2. The Company's Customer Support Department must promptly acknowledge receipt and will try to resolve the Customer's enquiry immediately. If the Customer's enquiry cannot be resolved immediately, the Company remains committed to addressing and resolving it in a prompt manner (usually within 3 business days). If additional time is required, the Company will issue a holding response in writing, acknowledging receipt of the enquiry and will notify the Customer of the timeline for further contact regarding the follow-up process and resolution.
- 3.1.3. If the Enquirer requires further clarification or assistance beyond the final response provided by the Customer Support Department, they may refer to Section 3.2, 'Submitting a Complaint,' to explore other channels for feedback. Note that enquiries, as defined, are not expressions of dissatisfaction but may lead to a complaint submission if the Enquirer feels the issue requires additional attention.

3.2. Submitting a Complaint

- 3.2.1. Any Customer who wishes to express dissatisfaction or raise a concern regarding the Company's services or products may submit a complaint directly, without the need to submit an enquiry first (hereinafter referred to as "the Complainant"). If, however, a Customer has initially submitted an enquiry and is not satisfied with the final response received from the Customer Support Department, they may choose to escalate the matter by submitting a formal complaint as outlined in this section.
- 3.2.2. Clients may contact the Company to raise a concern via email, telephone, live chat, or other official communication channels available on the website. However, to ensure the matter is properly recorded and handled in line with regulatory requirements, all complaints must be submitted by following the procedure outlined in this Policy, which is also available on the Company's website.
- 3.2.3. The Complainant, if possible, should report the date and details of the incident related to the complaint to the Company, as soon as possible. This is necessary to enable the Company to investigate and address the complaint as efficiently as possible.

- 3.2.4. The Company may accept complaints brought by third parties acting on behalf of a Complainant (Authorised Representatives), as long as, the Complainant authorised in writing the third party and provides this authorisation as evidence to the Company via his/her registered email. When the Complaint is submitted by a representative or other duly authorized person, the Company will investigate the legal basis of the submission. If no authorization is available, the Company will contact the Complainant directly, in order to accelerate the procedure.

When a complaint is submitted by representative, the Company will require the following information:

- i. Identification of both the person lodging the complaint on behalf of the customer and the customer. It is in the Company's discretion to request due diligence documentation and/or information on both the representative and the Complainant, as per the internal AML policies and procedures of the Company.
 - ii. The relationship between the representative and the Customer.
 - iii. The reason the customer cannot lodge the complaint themselves.
 - iv. An authorization letter and/or official document signed by the Complainant that authorizes the representative to file a complaint on behalf of the latter.
- 3.2.5. The Complainant must fill out and sign the Complaint Form, as indicated in "**Appendix 1**" of this Policy. The Complaint Form should include truthful, complete and accurate information. The Complainant can also include supporting documentation to accompany his/her Complaint. The information required through the Complaint submitted is indicative and additional information and/or clarification and/or evidence might be requested, for the Company to be able to handle / tackle the Complaint promptly and efficiently.

If the Complainant encounters difficulties submitting the Complaint Form through the official procedure outlined in this Policy, they may inform the Company using an alternative method, such as email or telephone as depicted in the relevant section of

the website **www.gccmarkets.com**. The Company will then assist the client in addressing their complaint.

- 3.2.6. Once the Complaint Form is completed and signed, the Complainant shall submit it electronically on the Company's website at **www.gccmarkets.com**.
- 3.2.7. Upon receipt of the complaint, it will be assigned to the Customer Service Department.

3.3. Acknowledging your Complaint

- 3.3.1. Upon the successful submission of the Complaint, the Company shall acknowledge receipt of complaints electronically within two (2) business days from the receipt of the complaint and shall include a unique reference number to the complainant.
- 3.3.2. As part of the acknowledgement, complainants will be advised on the timeframe for receiving a response and the designated contact person for any follow-up. The acknowledgement of complaints shall be on paper or on another durable medium with the ability to be stored, including digital means.
- 3.3.3. The unique reference number should be used in all future contact with the Company and will allow the complainants to follow up on the status of their complaint at any point.

3.4. Resolving the Complaint

- 3.4.1. Following acknowledgment of receipt, the Company will carry out an impartial review of the matter and communicate in writing to the Complainant the outcome of the Company's investigation and propose remedial actions (if applicable).

3.4.2. The Company shall aim to provide a response to the Complainant as soon as possible, but in any event within twenty-one (21) business days from the date the complaint is received.

3.4.3. In the unlikely event that the Company is unable to resolve the complaint within the timeframe mentioned in 3.4.2, the Company will inform the Complainant in writing of the reasons for the delay and indicate the expected period of time within which it is possible to complete the investigation. For grossly complicated complaints, this period may be extended up to a maximum of ninety (90) business days from the date the complaint was lodged. The Company shall notify the Complainant in writing of the extension and provide an updated timeline for completion, depending on the complexity of the case and the Complainant's cooperation.

3.5. The Complaints are handled by:

A) Customer Service Department

Employees of the Customer Service are responsible for receiving and managing all complaints within the Company. They are also available to assist Complainants in compiling and submitting their complaints, especially if the Complainant encounters difficulties in the process. Complaints should be submitted in relation to the services provided under the Client Service Agreement. Additionally, the Head of Customer Service is tasked with documenting all complaints or enquiries received by the Company.

- If possible, all Complaints must be acknowledged and settled without delay.
- Company employees forward all complaints submitted in writing to Customer Service.
- Customer Service shall be responsible for settling Complaints.

- The officers of the Customer Support Department will inform the Complainant of the appropriate process to follow.
- The Company aims to respond to the matter within the appropriate timeframe depending on the nature of the complaint and ensure that the maximum time to resolve the complaints do not exceed the timeframes as per section 3.4.2 and 3.4.3. of this Policy.

B) Compliance Officer

- If the complaint cannot be resolved by Customer Support, it will be forwarded to the CO.
- The CO will oversee the resolution process for more serious complaints.
- The CO and the Board of Directors will be notified of every complaint, regardless of its nature or severity.

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.
- Complaints deemed most serious will be escalated to the Directors.
- Directors of the Company shall settle those complaints that are considered the most serious and cannot be managed within the above procedures.
- The Directors, shall take into account the opinion of the Compliance officer of the Company in all such cases.

3.5.1. The Customer Support must provide every reasonable help during the handling/ examination of the Complaint to the CO and Company's Directors aiming to settle the complaint as soon as possible, and in the best interest of the Complainant.

3.6. [Additional Information on Enquiries and Complaints](#)

3.6.1. The Company may require, in writing, at any given time during the examination and handling of enquiries and complaints from the Complainant to provide additional

information, clarifications and/or documentation. The Complainant's full cooperation is essential in order for the Company's investigation to be concluded effectively.

- 3.6.2. The Company may decide to extend the investigation timeframe if the Complainant takes an extended period to respond or fails to provide a response within a reasonable or designated timeframe. However, if the Complainant does not cooperate or respond despite reasonable attempts, the Company may consider the matter closed, with all efforts to obtain feedback from the Complainant documented.

3.7. Communicating the resolution to the Complainant

- 3.7.1. The Company shall notify the Complainant upon the closure of an enquiry or complaint.
- 3.7.2. As per the timeframes depicted, the Company will send written communication to the complainant after the investigation and closure of a complaint with the following details, as outlined in the template provided in Appendix 2:
- a) an overview of the complaint
 - b) issues which have been considered in the investigation
 - c) outcome of the investigation
 - d) any applicable remedy and the timeframe to the customer to confirm acceptance or non-acceptance of the proposed remedy
 - e) the complainant's right to lodge a complaint to the FSA if unsatisfied
 - f) the contact details of the FSA
- 3.7.3. The Company is entitled to treat an enquiry or complaint as closed in the following circumstances, among others:
- a) where it is determined that no further action is required by the Customer and/or the Company, upon the issuance of the final decision by the Company, and/or
 - b) where the matter has been mutually resolved, and/or
 - c) where the Customer has failed to respond promptly and adequately to the questions and requests of the Company, and/or

- d) where the Company has given a substantive response and the Customer has failed to indicate that the response is unsatisfactory and/or substantiate the claim with relevant data, within a reasonable timeframe.

3.8. Vulnerable Complainants

- 3.8.1. The Company recognises that certain customers may, due to their personal circumstances, be considered vulnerable consumers as defined under the Financial Consumer Protection (Complaint Handling) Regulations, 2024.
- 3.8.2. A vulnerable consumer is a person who, because of their personal situation, is more susceptible to harm—particularly when the Company is not acting with appropriate levels of care. This may include, but is not limited to, elderly individuals, persons with disabilities, language barriers, or financial distress.
- 3.8.3. In all such cases, the Company is committed to ensuring that complaints from vulnerable consumers are handled with heightened sensitivity, confidentiality, and priority.
- 3.8.4. Where a complaint is submitted on behalf of a vulnerable customer by a third party, the Company may, in appropriate circumstances, waive the requirement of a signed authorisation letter, subject to internal assessment and provided that such waiver aligns with the guidance and discretion of the Competent Authority.
- 3.8.5. Nevertheless, in most cases, the Company will request:
- I. Identification of the complainant and the authorised representative;
 - II. The relationship between them;
 - III. The reason why the vulnerable complainant cannot lodge the complaint directly; and
 - IV. A signed authorization form (see **Appendix 3**).

Each case of a vulnerable complainant will be reviewed individually, with the aim of striking a fair balance between regulatory compliance, customer protection, and practical needs.

3.9. Resident Complaints Officer

- 3.9.1. The Company maintains a dedicated Resident Complaints Officer responsible for the effective oversight and administration of the complaints handling process as outlined in this Policy.
- 3.9.2. The Complaints Officer ensures that all complaints are managed with independence, objectivity and in a timely and efficient manner. This includes overseeing the investigation and resolution of complaints, ensuring appropriate communication with complainants throughout the process and maintaining the overall integrity and effectiveness of the Company's complaints handling framework.
- 3.9.3. The Complaints Officer is also tasked with monitoring trends, identifying recurring issues, and contributing to the continuous improvement of the complaints managements process.
- 3.9.4. The Company ensures that all relevant employees, including the Resident Complaints Officer and other staff involved in complaint handling, receive regular training to manage consumer complaints in an effective and time-bound manner. The Company shall also provide the necessary resources to its employees to enable them to carry out their responsibilities efficiently.

4. Monitoring of Complaints and Record Keeping

- 4.1. The Company maintains a Complaint Registry to record all complaints until they are resolved. The registry will serve as a living document, updated to reflect summaries of the Complaints received by the Company. This registry shall include at least the following information:
 - i. Complaint Reference Number
 - ii. Name of the Customer who filed the complaint
 - iii. Account Number of the Customer

- iv. Address of the Customer
- v. Contact Details of the Customer
- vi. Demographics i.e gender, nationality
- vii. Date Complaint was lodged
- viii. Date of the incident
- ix. Means of communication by which the complaint was lodged
- x. Type of Complaint
- xi. Subject and description of the complaint
- xii. Assigned employee handling the complaint
- xiii. Date of Acknowledgement sent to the complainant
- xiv. Investigation carried out
- xv. Action taken by the Company to resolve the complaint
- xvi. Date of Resolution
- xvii. Outcome of Resolution
- xviii. Summary of the Company's response to the complainant
- xix. Status of Complaint

- 4.2. The Company manages Complaints within a transparent system that can be traced and administered in each and every stage of the procedure.
- 4.3. The Company shall only collect the necessary information needed and avoid the unnecessary collection of data in regards to the complainant with the exception of recording data aimed to settle the complaint.
- 4.4. After resolving the complaint, the Company shall preserve all written and electronic documents and/or communication related to the complaint for a period of seven (7) years always in accordance with relevant Seychelles legislation for record-keeping requirements. Additionally, all personal information and/or particulars collected in the course of managing the complaint will be retained and protected, ensuring it remains identifiable for the same seven-year duration.
- 4.5. The Company shall provide complaint-related information to the Competent Authority within one (1) business day upon request.

5. Settlement of Disputes

- 5.1. When disputes between the Company and the Complainant cannot be settled by the official Company Complaints' procedure available on the Company's website, the Complainant may source alternative options to lodge their Complaint, including submitting it to the FSA.
- 5.2. If further to the investigation conducted by the Company, the Complaint of the Customer is rejected by the Company and/or is not resolved, the Complainant may lodge an appeal to the FSA for further review and investigation.
- 5.3. More information for the Complainant is accessible on the FSA website at <https://fsaseychelles.sc/complaint-handling>, as well as below:

Financial Services Authority (FSA): It is mandatory for complainants to fill in the Complaints Handling Form before any complaint is investigated by the Financial Services Authority. All the information indicated on the form must be provided. The Complaint Handling Form, which is available on the FSA website can be submitted by any of the following ways:	
1) Email address:	complaints@fsaseychelles.sc
2) Formal letter addressed to:	The Chief Executive Officer Policy (Information & Communication Unit) Financial Services Authority Bois De Rose Avenue P.O Box 991, Victoria Mahé, Seychelles
3) Hand-delivered directly to the Authority:	Bois De Rose Avenue, P.O. Box 991, Victoria, Mahe, Seychelles
Link to complaint handling form	https://fsaseychelles.sc/other-fsa-documents/complaint-form/download

Appendix 1: COMPLAINT FORM

TRADE MATCH LTD - Complaint Form

A. DETAILS OF THE COMPLAINANT

TITLE (MR/MS/MRS):	
FULL NAME:	
NATIONALITY:	
PASSPORT/ID NUMBER:	
ACCOUNT NUMBER (IF APPLICABLE):	
HOME/BUSINESS ADDRESS:	
TELEPHONE NUMBER:	
EMAIL ADDRESS:	

B. DETAILS OF THE REPRESENTATIVE LODGING THE COMPLAINT ON BEHALF OF THE COMPLAINANT *(IF APPLICABLE)*

TITLE (MR/MS/MRS):	
FULL NAME:	
HOME/BUSINESS ADDRESS:	
TELEPHONE NUMBER:	
EMAIL ADDRESS:	
RELATIONSHIP TO THE COMPLAINANT:	
REASON THE COMPLAINANT CANNOT LODGE THE COMPLAINT THEMSELVES:	

Note: Representative must attach signed written consent from the Complainant authorising them to submit the complaint on their behalf.

C. BRIEF SUMMARY OF THE COMPLAINT

Please describe the product or service you are complaining about (description, evidence, amount and suggested way to be solved):

Please enclose relevant documentation that may help the Company to handle this complaint efficiently. The documentation to be provided by the Client are client's statement, correspondence with the Company and any other supporting documentation to be requested by the Compliance Officer which is relevant to the Client's complaint.

DATE AND PLACE

COMPLAINANT'S SIGNATURE

Appendix 2: Final Complaint Resolution Letter Template

Date:

To: [Complainant's Full Name]

Address: [Complainant's Address]

Email: [Complainant's Email Address]

Complaint Reference Number: [Unique Reference Number]

Subject: Final Response to Your Complaint

Dear [Complainant's Name],

Following our investigation of your complaint received on [Date], we are writing to provide our final response in accordance with our internal complaint handling procedures and applicable regulations.

I. Overview of the Complaint

[Brief summary of the complaint as submitted by the complainant.]

II. Issues Considered in the Investigation

[Summarise the key issues that were examined during the investigation.]

III. Outcome of the Investigation

[The conclusion reached]

IV. Proposed Remedy

[Any remedy offered (e.g., refund, corrective action, etc) and clearly state the timeframe for the complainant to accept or decline the remedy.]

Please confirm your acceptance or non-acceptance of the proposed remedy by [insert date or number of business days].

V. Right to Escalate

If you are not satisfied with our response, you may escalate your complaint to the Financial Services Authority (FSA).

VI. Contact Details of the FSA

Financial Services Authority (FSA)

Bois De Rose Avenue, P.O. Box 991, Victoria, Mahé, Seychelles

Email: complaints@fsaseychelles.sc

Website: <https://fsaseychelles.sc>

Please do not hesitate to contact us should you require further clarification.

Yours sincerely,

Name

Title

Department

TRADE MATCH LTD

FOR INTERNAL USE ONLY:

Complaint Reference number:	
Date of Complaint Lodged:	
Date of Incident (if applicable)	
Means of communication by which the complaint was lodged:	
Type of product/service and nature of the Complaint:	
Demographics (if provided): Gender/Nationality/Country of Residence	
Brief Description of the Complaint	
Employee and Department that received the Complaint:	
Assigned Officer Handling the Complaint:	
Acknowledgment Sent to Client:	Yes ☐ / No ☐ - Date: _____
Informed Client of Initial Action:	Yes ☐ / No ☐ - Date: _____
Final Response Provided to Client:	Yes ☐ / No ☐ - Date: _____
Summary of Investigation and Action Taken:	
In summary, the content of the Company's response to the Complaint:	
Status of Complaint:	Pending ☐ / Unresolved ☐ / Resolved ☐

Holding Response Provided to Client:	Yes ☐ / No ☐ / N/A ☐
 _____ Name of Responsible Officer and Signature	 DATE:

Appendix 3: Declaration of Authorisation for Vulnerable Consumers

TRADE MATCH LTD (the “Company”)

This form is to be completed in cases where a consumer, identified as vulnerable in accordance with internal policies and the applicable legislation, wishes to authorise a third party (hereinafter referred to as the “Authorised Representative”) to act on their behalf in submitting or managing a complaint or enquiry with the Company.

1. Details of the Vulnerable Consumer

Full Name: _____

ID/Passport Number: _____

Date of Birth: _____

Residential Address: _____

Email Address: _____

Telephone Number: _____

2. Nature and Scope of Authorisation

I, the undersigned, hereby confirm that I authorise the above-named person to act on my behalf with respect to the following (tick all that apply):

- ☐ Submitting a complaint to the Company
- ☐ Receiving communication and updates regarding the complaint
- ☐ Providing additional information or documentation as required
- ☐ Accepting or rejecting proposed resolutions
- ☐ Withdrawing or closing the complaint

This authorisation is granted due to (tick applicable reason):

- ☐ Cognitive impairment
- ☐ Language or literacy barriers

- ☐ Mental or physical health difficulties
- ☐ Age-related challenges
- ☐ Other (please specify): _____

3. Declaration

I confirm that this authorisation is granted voluntarily and with full understanding of its implications. I understand that I may revoke this authorisation at any time in writing. I further confirm that the Authorised Representative is acting in my best interest and will comply with all applicable confidentiality obligations.

Signed at [Location] on this ____ day of _____, 2025

Signature of Vulnerable Consumer: _____

Signature of Authorised Representative: _____

Name of Witness (if required): _____

Signature of Witness: _____

For Internal Use Only

- ☐ Verified ID of Vulnerable Consumer
- ☐ Verified ID of Authorised Representative
- ☐ Justification of Vulnerability Confirmed
- ☐ Approval Granted by: _____

Date: _____