



**Complaint Handling Policy
and Procedures**

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Purpose

The purpose of this Complaint Handling Policy is to outline the procedure that will be implemented by employees of NEO Capital Markets Limited (hereinafter "The Company") in relation to addressing and resolving complaints of customers in a fast and effective manner.

Definitions

"Complaint" is defined as a statement or an expression of dissatisfaction addressed to the Company by a client (natural or legal person) regarding the provision of investment and/or ancillary services provided by the Company to the client.

"Complainant" is defined as any person, natural or legal, who has read, agreed with and accepted all the terms and conditions contained in the Client Agreement (without modifications), has opened a trading account with the Company and has lodged a complaint.

The Company considers having a complaint when the complainant has filled out the relevant Complaint Form, hereto attached as Appendix A, and submitted it to the Company via the following methods:

- By email at support@legacytradeltd.com
- When the complainant has completed the relevant form on the *Contact us page*. In case the Company receives a notification 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 as 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 his/her enquiry as a complaint.

Complaint Handling Procedure

The Support Department and if necessary, the Compliance Department, shall efficiently handle any complaint received by a Complainant. In the case that the complaint is against the Compliance Department, the complaint shall be handled by a member of the Senior Management.

Procedure to be followed for Verbal Complaints

It is the Company's Policy not to accept any verbal complaints or grievances. Should any of the Company's employees (regardless of department) receive a verbal complaint or grievance, the following procedure must be followed:

- a. The employee receiving the verbal complaint or grievance shall take all the necessary actions so that the complaint or grievance is properly addressed. The said employee will inform the Complainant that all the complaints or grievances must be made in writing by completing the relevant Complaint Form, hereto attached as Appendix A, and submit it to the Company via email to support@legacytradeltd.com. Once the Complainant completes and submits the Complaint Form, in the manner described above, the *Procedure for Written Complaints* shall be followed as described in paragraph b.
- b. If the Complainant submits the Complaint Form to his/her Account Manager then the complaint or grievance, in the form that has been received, must be forwarded to support@legacytradeltd.com within the same working day.
- c. Subsequently, a member of the Support Department will inform the Complainant that his/her complaint or grievance has been forwarded to support@legacytradeltd.com, providing all details so that the Complainant is aware who is dealing with his/her complaint or grievance.

- i. The member of staff, in addition to the above, should make all best efforts to ensure that in the case of the complaint or grievance being of such nature that can be resolved immediately, to do so that the client will not have to pursue the filing of a formal complaint. The member of staff in such a case shall not:
 1. Commit himself/herself in any way to the client
 2. Address any issues in relation to best execution
 3. Address any issues relating to legal issues
4. Commit the Company in taking any action prior to examining the issues in a formal manner

Procedure to be followed for Written Complaints

When a written complaint is received, in the manner described in Paragraph “*Definitions*”, the procedure which shall be followed by the Company is the following:

- a. If the complaint was not received in the manner described in Paragraph “*Definitions*” (i.e. the complaint was received through internal channels of communication such as chat, client correspondence, NEO Capital Markets personal email, or by a member of the Back Office Department or by an Account Manager or by any other NEO Capital Markets employee) then the complaint, in the form that has been received, must be forwarded, in the form it has been received, to support@legacytradeltd.com within the same working day.
- b. Once the Complainant submits a written complaint, a member of the Support Department will send an electronic acknowledgment of receipt to the Complainant’s registered email address within five (5) working days following receipt, to verify that the Company has received the written complaint and will request the Complainant to complete the relevant Complaint Form, hereto attached as Appendix A.
- c. Upon completion and submission of the Complaint Form, a member of the Support Department will investigate the grounds of the complaint and if, based on the information provided, the grievance does not fall within the definition of “complaint” or is not considered to be a complaint it will be categorized as an enquiry and will be forwarded to the relevant department to be handled appropriately.
- d. If the grievance falls within the definition of complaint or is considered to be a complaint, then the Head of the Support Department or a member of the Support Department will register the complaint to an internal register by giving it a unique reference number which will be communicated to the Complainant within five (5) working days.
- e. In addition, a member of the Support Department shall inform the Complainant of the following:
 - i. That the Complainant must use the given reference number in all future correspondence with the Company regarding the submitted complaint
 - ii. The process which is followed when handling a complaint
 - iii. Who is the person or the department that is dealing with his/her complaint and their contact details
 - iv. What is the indicative handling time (i.e. 15 working days)
 - v. That the complaint handling procedure is free of charge
- f. Moreover, the following information should be obtained by the Client and recorded:
 - i. The client’s full name and surname
 - ii. The client’s trading account number
 - iii. The affected transactions (if applicable)
 - iv. The date that the issue arose and a description of the issue
 - v. The service provided by the Company and related to the complaint
 - vi. The employee responsible for the provision of those services
 - vii. The department where the employee belongs
 - viii. The content of the complaint
 - ix. The capital and the value of the financial instruments which belong to the client
 - x. The magnitude of the damage claimed by the complainant

- xi. Reference of any correspondence exchanged between the Company and the complainant
 - g. The Company will thoroughly examine and assess the following:
 - i. The facts and the information provided by the complainant
 - ii. The facts and the information provided by the employee responsible for the provision of those services (if applicable)
 - iii. The information/data which have been retrieved from the Company's archive (i.e. the complainant's transactions, trading history, correspondence, electronic email, recorded telephone calls, IT data etc)
 - iv. The events leading to the complaint
 - h. The Company upon examining the complaint and reaching a decision to this respect shall inform the Complainant about the Company's decision, in writing and in plain language which is clearly understood, together with the reasoning of the Company's decision and any remedial measures it intends to take.
 - i. The Company shall make every effort to resolve the complaint within fifteen (15) working days. When deemed necessary, the Support or the Compliance Department shall convey the complaint to the Senior Management for further investigation. In this case, the Company might take additional time to finalise the reply. The Senior Management shall investigate further and coordinate with relevant heads of departments to attend to the subject of the complaint.
 - j. In the event that the Company cannot provide a response to the Complainant within the handling time given to the complainant, it will keep the Complainant informed about reasons of delay and indicate when the investigation is expected to be completed. This period of time cannot exceed two months from the submission of the complaint.
 - k. Once the complaint is concluded the Head of the Support Department will keep an electronic record of the complaint received, detailing the course of action which was taken, including what information, data and evidence were gathered, what measures were taken for the complaint's resolution, whether any conflicts of interest between the Company and its clients and between other clients were identified, what was the outcome and how that outcome was reached.

Record Keeping of Complaints

The Company shall maintain record of all complaints for a minimum period of seven years after the closure of the client's trading account. The responsible department shall be the Support Department.

Appendix

A:

COMPLAINT FORM

Client Name: _____

Account Number ID: _____

Residential Address: _____

Telephone Number: _____

Date & Time the disputed situation arose	
Services provided by the Company	
Employee responsible for the provision of those services	
Department where the employee belongs	
Affected transactions	
The ID's of the affected positions	
Equity before	
Equity after	
Claimed magnitude of damage	
Suggested way to be resolved	

Brief Description of the Complaint:

Date:

Signature:

Please enclose any relevant evidence and supporting documentation such as: screenshots, reports, error messages and error codes (if any) Submit the form to support@legacytradeltd.com