

# Complaints Handling Procedure



**TRADEFILLS**  
WHERE EXECUTION MATTERS

TradeFills Limited is registered in the Financial  
Services Authority of Saint Vincent and Grenadines  
Registration number: 26568 BC 2021

Email: [support@tradefills.com](mailto:support@tradefills.com)

# COMPLAINTS HANDLING PROCEDURE

## 1. INTRODUCTION

TradeFills Limited is incorporated in St. Vincent & the Grenadines as a Business Company with the registration number 26568 BC 2021 in accordance with the Business Companies (Amendment and Consolidation) Amendment Act 2018 on December 14, 2021. The Objects of the Company as set out under Section 9 of its Articles of Incorporation is dated and registered with the Authority. The objects of the Company are all subject matters not forbidden by Business Companies (Amendment and Consolidation) Act, Chapter 149 of the Revised Laws of Saint Vincent and Grenadines, 2009 in particular but not exclusively all commercial, financial, lending, borrowing, trading, service activities, the participation in other enterprises. To provide brokerage, training and managed account services in currencies, commodities, indexes, CFDs and leveraged financial instruments. The website [www.tradefills.com](http://www.tradefills.com) is operated by TradeFills Limited, with registered office at Suite 305, Griffith Corporate Centre, P.O. Box 1510, Beachmont Kingstown, St. Vincent and the Grenadines and NOT by any affiliate entity.

The Company has implemented and maintains a Complaints Handling Procedure (the ("Procedure")), which is described in this document.

## 2. INTERPRETATION TERMS

2.1. Unless the context requires otherwise, all terms included in this Procedure shall have the meaning given to them herein. Where the context requires, (a) words importing the singular shall include the plural and vice versa and (b) words importing the masculine shall include the feminine and vice versa.

## 3. SCOPE OF THE COMPLAINTS HANDLING PROCEDURE.

3.1. The purpose of the Procedure is to set out the internal complaint resolution system and procedures which the Company has established, maintains and follows for the resolution of complaints.

## 4. DEFINITION OF COMPLAINT

4.1. A complaint is an expression of dissatisfaction by a client regarding the provision of investment and/ or ancillary services provided to him by the Company. Complainant is the person, natural or

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legal, which is eligible for lodging a complaint to a Company and who has already lodged a complaint.

4.2. A complaint received by a Client shall include:

- A. the Client's name and surname;
- B. the Client's trading account number;
- C. the affected transaction numbers, if applicable;
- D. the date that the issue arose and a description of the issue.

4.3. A complaint must not include offensive language directed either to the Company or a Company employee.

### **5. PROCEDURE**

5.1. All complaints or grievances must be in writing and shall be addressed, to the Customer Support Department of the Company via email at [support@tradefills.com](mailto:support@tradefills.com).

5.2. If the client receives a response from the Customer Support but deems that the complaint or grievances needs to be raised further for an independent review, the client may ask the Customer Support to escalate it to the Client Audit Team who will independently and investigate it.

5.3. The Company will not be able to handle or investigate a complaint, if the requirements included in paragraphs 4.2 and 4.3 above are not fulfilled. In such an event the Company shall revert back to the Client and request him to send any additional information. In any event, one of the Company's officers may contact the Client directly in order to obtain further clarifications and information relating to his complaint. The Company shall need the Client's cooperation in order to handle the complaint.

5.4. Upon receipt of the complaint the department which has received the complaint shall record the complaint in the complaints registered maintained by the Company as per Par. 8 of the Procedure.

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5.5. The Company shall thoroughly examine all complaints as required (taking into account any information contained within the books and records of the Company, including but not limited to the Client's trading account history) without undue delay.

5.6. The Company will treat each complaint with reasonable care and reach a fair outcome.

5.7. Upon receiving the complaint, the Company will inform the complainant within five (5) business days that it had received the complaint and provide him with a unique reference number, which shall correspond solely to his complaint and it must be used throughout his correspondence with the Company regarding the specific matter and/or complaint.

5.8. The Company shall send its initial response to the Client within ten (10) business days from the actual receipt of the complaint. If the complaint requires further investigation and it cannot be resolved it within ten (10) business days, it will issue a holding response in writing or in another durable medium. When a holding response is sent, it will indicate when the Company will make further contact and inform the Client on the progress of the investigation.

5.9. The Company shall investigate and reply to the complainant within two (2) months from the date of reception of the complaint.

5.10. Upon completion of the investigation the Company shall send a written notice to the complainant informing him:

- A. Of the outcome of the investigation along with the reasons for reaching such a decision; or
- B. If applicable, the nature and terms of any offer and/or settlement.

5.11. If the Company does not manage to conclude its investigation and/or respond to the complainant within two (2) months from the date of receipt of the complaint, the Company shall send a written notice explaining the reasons for not reaching a decision and/or concluding the investigation yet, the reasons for the delay as well as indicate the period of time within it shall be able to complete the investigation. It is noted that the Company shall not provide its response later than three (3) months from the submission of the complaint.

## 6. PRINCIPLES OF THE PROCEDURE

6.1. All complaints shall be treated confidentially.

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6.2. The Company shall deal with Client's complaints without undue delay.

6.3. The company will resolve all complaints in a fair manner.

### 7. RECORD KEEPING

7.1. The Company has established, maintains and updates the complaints register with details of all the complaints received per month for a period of five (5) years. The following information is recorded in the complaints register:

- A. date of the complaint;
- B. wallet number;
- C. identification of the complainant;
- D. complaint cause;
- E. the financial instrument;
- F. the disputed amount;
- G. settlement date if applicable; and
- H. any comments thereof.

### 8. CONTACTS

Customer Support Department: [support@tradefills.com](mailto:support@tradefills.com)

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