FxGrow
Growell your Trading

Complaints Handling Policy

Client Complaints or Grievances

1. General

The Company shall maintain effective and transparent procedures for the reasonable and prompt handling of complaints or grievances received from Retail Clients or potential Retail Clients not only regarding CFDs related services but also including those arising from crypto-asset (custody, trading, price feeds) via third-party providers, and to keep a record of each complaint or grievance and the measures taken for the respective resolution, as applicable.

Such procedures and records shall be the responsibility of the Administration/Back Office Department.

The Company shall commit adequate resources at all times for complaints handling with sufficient levels of delegated authority. The Company identifies the need for Internal Operations Manual complaints to be investigated fairly, unbiased and independently. For the avoidance of any conflicts of interest, the Company shall delegate the duties for handling and resolving of complaints or grievances to employees who are not involved in the provision of investment services.

The Internal Auditor shall supervise the implementation of the Company policy and procedures with respect to Client Complaints or Grievances.

2. Policy

The Company maintains a complaints management process, which has been defined and endorsed by the Senior Management and the Board, who are responsible for its implementation and for monitoring the Company's compliance with it.

The Internal Auditor shall supervise the implementation of the Company's policy and procedures with respect to Client Complaints or Grievances.

3. Complaints Management Function

The Company shall commit adequate resources at all times for complaints handling with sufficient levels of delegated authority. The Company identifies the need for complaints to be investigated fairly, unbiased and independently. For the avoidance of any conflicts of interest, the Company shall delegate the duties for handling and resolving of complaints or grievances to employees who are not involved in the provision of investment services.

As such, all complaints are handled by the Company's Compliance Officer and Risk Manager. The Compliance Officer and Risk Manager shall be the persons responsible for coordinating the different departments of the Company for the proper and timely handling of every complaint or grievance and shall be acting at all times under the supervision and guidance of the Company's Senior Management.

The Compliance Officer and Risk Manager shall have authority and access to all departments of the Company to properly investigate complaints. Depending on the outcome of the investigation, the Compliance Officer and Risk Manager, shall consult with the Company's Senior Management and shall initiate formal discussions with the claimant for the resolution of his complaint. The Compliance Officer and Risk Manager shall have the authority to offer resolutions up to an amount which shall be decided by the Company's Senior Management on a case by case basis.

4. Complaints Management Process

(a) The procedures for handling Clients' complaints established, implemented and maintained by the Company should:

• be simple and clear

• ensure that customers are treated fairly

• be effective and aid decision making

• ensure fair outcomes.

(b) The complaints handling arrangements established by the Company should be known and easily accessible to Clients.

(c) Complaints handling should be made without undue delay, taking into account the seriousness of the complaint and the extent of economic impact arising from the content of the complaint, both for the Client and the Company.

(d) The Company is required to examine all complaints received from Clients and inform them of the outcome.

(e) The Company shall keep records of complaints where all the information and documents relating to the submitted complaints are included, as well as the final outcome of these. The Company will register the complaint directly to an internal register, giving it a unique ten-digit reference number which will be communicated to the complainant as well.

(f) The following details have to be documented

• the identity of the Client who filed the complaint or grievance

• the identity of the employee that undertook to provide the service to the Client

• the department to which the relevant employee relates to

• the date of receipt of the complaint or grievance

• the details of the complaint or grievance – full description

• the extent in financial terms of the potential loss that the Client claims has suffered

• the date and in summary, the content of the reply of the Company to the said complaint or grievance.

(g) Every month, the Company shall provide CySEC information regarding the complaints it receives and how these are being handled. In particular, the Company shall complete every month the relevant Form and submit same to CySEC in electronic form through TRS, within five (5) days after the reporting month. In the event that the Company did not receive any complaint within the reporting month, it shall submit the form to CySEC with a 'No' indication in the relevant field without any further information.

In the event where the Company has resolved and/or revised a complaint which was referred to CySEC in a previous submission of the abovementioned Form, the Company shall complete all fields of the relevant Form, as applicable, and select the 'U' from the column Record Type.

(h) The Company shall analyse, on an on-going basis, complaints handling data, to ensure that they identify and address any recurring or systemic problems, and potential legal and operational risks, for example by:

• analysing the causes of individual complaints so as to identify root causes common to types of complaints,

• considering whether such root causes also affect other processes or financial means, including those not directly complained of; and

• correcting, where reasonable to do so, such root causes.

(i) On request or when acknowledging receipt of a complaint, the Company shall provide written information regarding its complaints-handling process. The Company shall confirm, within five (5) days, the receipt of the complaint to the complainant.

(j) The Company shall publish details of its complaints-handling process in an easily accessible manner (e.g. in brochure, pamphlets, contractual documents or via the Company's website).

(k) The Company shall provide clear, accurate, and up-to-date information about the complaints-handling process which includes:

• Information of how to lodge a complaint (e.g. the type of information to be provided by the complainant, the identity and contact details of the person or department to whom the complaints should be directed).

• The process that will be followed when handling a complaint (e.g. when the complaint will be acknowledged, indicative handling time, the availability (where applicable) to contact CySEC or the Financial Ombundsman or ADR mechanism or the relevant Courts).

(l) In case the Company receives a complaint it shall:

• Gather and investigate all relevant evidence and information regarding the complaint.

• Communicate in plain language which is easily understood.

• Provide a response without undue delay. The Company shall investigate the complaint and reply, within two (2) months, to the complainant about the outcome/decision. In the event that the Company is unable to respond within two (2) months, it informs the complainant of the reasons for the delay and indicates the period of time within it is possible to complete the investigation. This period of time shall not exceed three (3) months from the submission of the complaint.

• When providing a final decision that does not fully satisfy the complainant's demands, to notify in writing the complainant using a thorough explanation of its position on the complaint and set out the complainant's option to maintain the complaint (e.g. though CySEC, the Financial Ombundsman, ADR Mechanism, or the relevant Courts).

(m) Complainants shall be able to file complaints and receive the above procedures for complaints free of charge.

5. Resolving Clients Complaints or Grievances

The Head of the Administration/Back Office Department shall be responsible for documenting all complaints or grievances received by the Company. In this respect, the Head of the Administration/Back Office Department shall establish a medium through which complaints or grievances are received and stored.

Following the receipt of a complaint or grievance, by the Company, the Head of the Administration/Back Office Department shall make efforts to resolve the complaint or handle the grievance without any unnecessary delay and within five (5) working days. Following resolving or handling the issue, the Head of the Administration/Back Office Department shall record the remedy measures or explanations granted, as applicable.

In the event that the issue has not been resolved within five (5) working days, or if the remedy measure involves actions by other departments, then the Head of the Administration/Back Office Department shall communicate the Client complaint or grievance to the General Manager. The General Manager should inform the Client about the causes of the delay and indicate when the Company's investigation is likely to be completed.

Furthermore, the General Manager shall review carefully the details of the Client's complaint or grievance brought to him. Once the General Manager understands fully the nature of the Client complaint or grievance, he may also communicate with the Client, to understand fully the nature and implications of the complaint or grievance, as applicable and shall investigate further until the Client complaint or grievance is satisfactorily resolved or handled, as applicable.

The General Manager shall inform the Board as well as the legal advisor, as applicable, of the Company of all Client complaints or grievances brought to him, at least annually.

In cases where Client complaints or grievances are in relation to the Administration/Back Office Department, the Compliance Officer of the Company shall have the responsibility and shall undertake the necessary efforts for resolving the complaint or grievance following the same procedures described in this Section of the IOM.

All decisions relating to Clients' complaints or grievances shall be communicated to Clients in writing (including electronic mail) and copies shall be retained by the Administration/Back Office Department. The decisions with respect to complaints or grievances in relation to Administration/Back Office Department shall also be retained by the Compliance Officer.

6. Record-Keeping

The Company shall maintain all complaints or grievances for a minimum period of five (5) years. The responsible Department shall be the Administration/Back Office Department.

Further to the above, for Client complaints or grievances related to the Administration/Back Office Department, the Compliance Officer will also keep a copy of the relevant Client complaints or grievances, as applicable.

Last revised June 2026