



Complaints Management Policy

Global Business Company No. 196840
Zendo 5th Floor, ICONEBENE Rue de L'Institut, Ebene 72201, Mauritius

Registration number:
FSC Mauritius Investment Dealer
License No. GB 22201274

Tel:
+230 460 2934

Email:
info@islandprime54.com

Website:
www.islandprime54.com

COMPLAINTS MANAGEMENT POLICY

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1 Introduction

Island Prime 54 Limited (“IP54”) is a Global Business Company (Company No.196840) which is authorized and regulated by the Financial Services Commission (FSC) as an Investment Dealer and the party executing this document. Access2Markets is the retail identity of Island Prime 54 Limited. IP54-Access2Markets is the trading name of Island Prime 54 Limited and is approved by Registrar of business, Mauritius.

Policy Statement:

IP54 is keen to address complaints and view it as an opportunity to learn, adapt, improve and offer better service to clients. The reference to Client means the ‘client’ as defined in the ‘Client Agreement’.

This Complaint Management Policy (CMP) is intended to ensure that complaints are dealt with properly and that all complaints or comments by customers are taken seriously. IP54 supports the concept that most complaints, if dealt with early, openly and honestly, can be resolved with the complainant. The aim is therefore to ensure that the complaints procedure is properly and effectively implemented, and that customers are confident that their complaints are acted upon promptly and fairly.

Complaints Management Framework:

- Definitions
- Complaints management process
- Procedure for Complaints
- Record-keeping, Monitoring & Analysis of Complaints
- Communication with complainants

2 Definitions

“Client query” means a request to IP54 by or on behalf of a client, for information regarding its intermediary services, or to carry out a transaction or action in relation to the intermediary service.

“Complaint” means an expression of dissatisfaction by a person to IP54 or to its service supplier relating to an intermediary service provided or offered which indicates or alleges, regardless of whether such an expression of dissatisfaction is submitted together with or in relation to a client query, that -

- (a) IP54 or its service provider has contravened or failed to comply with an agreement, a law, a rule, or a code of conduct which is binding on it or to which it subscribes;
- (b) IP54 or its service provider’s maladministration or willful or negligent action or failure to act, has caused the complainant harm, prejudice, distress or substantial inconvenience; or
- (c) IP54 or its service provider has treated the complainant unfairly.

3 Complaints Management Process

The policy seeks to ensure that the following process in terms of complaints is followed:

- a) Customers are aware of how to complain, and provides a platform for complaints to be registered;
- b) An appointed individual of IP54 will be responsible for the administration of the procedure;
- c) Every written complaint will be acknowledged in writing within two business days;
- d) Investigations into written complaints and will endeavor to send a final response within 14 business day of receipt of complaint;
- e) All complaints will be responded to in writing;
- f) Complaints will be dealt promptly, fairly and sensitively with due regard to the concern of the customer;
- g) Details of the complaint will be recorded and if required, changes will be implemented to the policy of IP54. in dealing with customers to mitigate and/or avoid future complaints.

Responsibility for oversight, implementation and monitoring of the CMP is allocated to an individual who has the appropriate level of authority, competence and resources to ensure that the CMP is adhered to fairly, objectively and transparently and that any conflicts of interest are identified and mitigated.

4. Procedure for Complaints

4.1. Complaints will be submitted in writing, contain all relevant information and will be addressed to the Customer Support Cell. The Client will be advised of the senior person who will be dealing

with the complaint. Copies of all relevant documentation will be included. If the complaint is made via telephone, the Customer Support Cell will request the complainant to lodge the complaint in writing (at least on an e-mail). Investigation of the complaint will only begin once the complaint has been received in writing by the company. The complainant will be advised of this requirement.

4.2. A complaint shall include:

- a) The client's name and surname ;
- b) The client's trading account number ;
- c) The affected transaction numbers, if applicable; the date and time that the issue arose; and
- d) A description of the issue.

4.3. A complaint must not include Offensive language directed either to IP54 or a IP54 employee

4.4. If the client receives a response from the Customer Support Department but deems that the complaint needs to be raised further, the client may either ask the Customer Support Department to escalate it to the Compliance Department or directly contact the Compliance Department complaints@islandprime54.com, which will independently and impartially investigate it. Both the Customer Support Department and the Compliance Department shall thoroughly examine any complaints as required (taking into account any information contained within the books and records of the firm, including but not limited to the client's trading account journal) to reach a fair outcome.

4.5. The Client's complaint will be acknowledged within 48 hours of receipt. There will be an investigation done into the complaint and IP54 will endeavor to send a final response to the client within fourteen (14) business days of receipt of the complaint. If the final response is not sent within this time frame then IP54 will write to the Client explaining the reason and advise on the expectation of a final response.

4.6. If more than Thirty (30) business days from the date of Client's complaint has past and the Client has not received a final response, or is dissatisfied with the final response received, then the client is entitled to refer the complaint to the Financial Services Commission (FSC), Mauritius via any of the below methods:

Electronically:

<https://www.fscmauritius.org/en/consumer-protection/complaints-handling/complaints-form>

Mail/Fax: Mail or fax a description of your complaint, or a printed copy of your completed online complaint to:

Chief Executive

Financial Services Commission,

FSC House

54 Cybercity Ebene,

Mauritius

Fax: (+230) 467-7172

5 Record-keeping, Monitoring & Analysis of Complaints

Complaints information is recorded in accordance with this subsection and will be scrutinised. It will be analysed by IP54 on an ongoing basis and utilised to manage risks and effect improved outcomes and processes for its clients, and to prevent recurrences of similar outcomes and errors.

6 Communication with Complainants

- IP54 will ensure that its complaint processes and procedures are transparent, visible and accessible through channels that are appropriate to its clients.
- All communications with a complainant will be in plain language.
- The Clients will be provided with a single point of contact for submitting complaints, wherever feasible.
- Complainants will be kept adequately informed of:
 - the progress of their complaint;
 - causes of any delay in the finalisation of a complaint and revised timelines; and
 - the decision taken in response to the complaint.

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