

RAW TRADING LTD

Complaints Handling Policy

Version 4.2

1. Introduction

This Policy regulates effective, clear and fast handling of complaints submitted to Raw Trading Ltd (hereinafter the “**Company**”) in relation to its services. The Company maintains records of its complaints and measures taken for their expedient resolution, in line with applicable Laws, Rules and/or Regulations. The Company manages all complaints equally and fairly, without any discrimination, in harmony with the procedure of this Policy. The Policy also promotes accessibility to the complaints handling process for all consumers, while ensuring compliance with anti-discrimination requirements.

2. Definitions

Complaint: Means an official complaint submitted to the Compliance Department, as per the guidelines of this Policy and following the completion and submission of the relevant Complaint form included in Appendix 1 of the present Policy. A Complaint is defined as an expression of dissatisfaction by the financial consumer in respect of the products or services provided by the Company, or the conduct of the Company in the provisioning of products or services, and where a response or resolution is expected by the financial consumer, and the term “complainant” shall be construed accordingly;

3. Submitting a Complaint

A complaint can be raised to the Company via telephone or written electronic communication (e-mail) to the Customer Support Department of the Company. The Complainant should report the event, the date of the occasion, the subject of the complaint and provide all supplementary evidence to the Company as soon as possible. This is necessary to enable the Company to investigate the complaint as efficiently and timely as possible. A complaint may also be lodged on behalf of a complainant, provided that the appropriate written consent has been submitted to the Company. The Complainants must submit their complaints in relation to services rendered on the basis of the Terms & Conditions of the Company. The Terms & Conditions of the Company are available on the website of the Company.

4. Investigation of a complaint

When the Company has the relevant resources and if possible, the complaints shall be investigated on the same day of the complaint’ submission. During the investigation process, the Company will ensure to make all necessary checks, liaise internally and gather all related information in order to provide an impartial response to the Client’s complaint.

5. Response to Complaints and resolution timeframes

After submitting your complaint, the Company will provide a reply within a period of twenty -one (21) business days unless we inform you otherwise. The outcome of the investigation, including the reasoning and resolution, will be communicated to you.

Some complaints may be resolved more quickly depending on their complexity and nature. On the other hand, other complaints might be more complex complaints or require the provision of more clarifications and/or supporting evidence thus requiring longer than twenty-one (21) business days to resolve, the resolution period may be extended to up to ninety (90) business days. In such cases we will communicate the reasons for the delay.

The Company adds correct, clear and unanimous reasoning to every decision brought down to settle complaints, which are mailed to the Complainant in writing. If the decision refers to legislation, its relevant regulations must also be included in the above reasoning.

The following Company department is responsible for the handling of Complaints:

Compliance Department

The Compliance Department is the function responsible for overseeing the management and resolution of complaints. If the Customer Support Department is unable to settle the enquiry efficiently or within a short period of time, they shall refer the Client (or escalate the complaint) to the Compliance Department. In cases when the Complainant does not accept the solution offered by the Customer Support Department, they are entitled to approach the Compliance Department directly.

The Company shall within 2 business days, acknowledge in writing the receipt of a complaint. This acknowledgment shall include:

- A unique reference number for the complaint;
- The name and contact details of the designated officer or department handling the complaint;
- A clear timeframe for when the complainant will receive a response.

If feasible, the Company aims to resolve the matter within as soon as possible depending on the nature of the complaint and ensure that the maximum time to respond to complaints does not exceed twenty-one (21) business days from the date of lodging the complaint.

If possible, all complaints must be investigated and settled without delay. Company employees forward all formal complaints submitted in writing to the Compliance

Department. The Customer Support officers shall inform each complainant of the appropriate process to follow.

To ensure the Company can properly address each complaint, complainants are required to complete the Complaint Form included in Appendix 1 and submit it to the Compliance Department. In the event when the Complaint Form is not used, the Client's complaint cannot be addressed by the Compliance Department.

6. Record Keeping of Complaints

The Company shall maintain a Complaint Registry in accordance with the Financial Consumer Protection Act and all its subsequent amendments and ensure that it is regularly updated to include all submitted complaints. The Company record keeps the data needed for the settlement of the complaint. The Company manages complaints within a transparent system; they could be traced and administered in each and every stage of the procedure. Since the Company accepts formal complaints only via email, all the correspondence is duly recorded. The Company shall preserve every written or electronic document related to complaints for a period of 7 years. The Company shall be entitled to prepare statistics and reports about complaints, which will be aimed at improving the efficiency of administering complaints.

7. Settlement of Disputes

Financial Commission:

Should a complaint remain unresolved by the Company or the Client remains dissatisfied, he/ she can escalate his/ her complaint to the Financial Commission (<https://financialcommission.org>, <https://financialcommission.org/icmarkets>) which the Company is a member of. The Financial Commission is an independent and impartial Forex and CFD dispute resolution organisation. Clients should contact the Financial Commission always in accordance with the Commission's rules and procedures: Dispute Resolution Process | Financial Commission | EDR.

Financial Services Authority in Seychelles (FSA):


If the Client remains dissatisfied with the Company's and/ or Financial Commission's decision, he/ she may escalate his/ her complaint to the Competent Authority, the Financial Services Authority in Seychelles (<https://fsaseychelles.sc/>). For more information on the complaint handling process, please visit the FSA's official website at <https://fsaseychelles.sc/complaint-handling>. The Authority's contact details are also available on their website.

Appendix 1 – Complaint Form

Client Information

Full Name:	
Email Address:	
Date of Incident:	
Account Number(s):	
Address:	
Telephone Number:	
Claimed sum:	

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 all supporting documentation and evidence that may help us to handle the complaint. Possible documentation that will be required: client statement, correspondence with the Company, as well as any other supporting documentation to be requested by the Compliance Officer which is relevant to the Client's complaint.

DATE _____

Client Signature

For internal use only:

Complaint Received By:

Date:

Acknowledgement sent to Client:

☐ Yes☐ No

Informed Client of initial action:

☐ Yes☐ No

Final response provided to Client:

☐ Yes☐ NoHolding response provided to
Client:☐ Yes☐ No☐ N/A

Signature of Compliance Officer:

Date: