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## COMPLAINTS HANDLING MANUAL

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## 1. Background

DYNAMIC MARKETS is the registered trade mark of GLOBAL DYNAMIC MARKETS LIMITED.

References to the term “Company” throughout this policy relates to Global Dynamic Markets Limited.

The Company is duly incorporated under the laws of the Republic of Mauritius and bears Company registration number 179025 GBC. The Company is duly licensed by the Financial Services Commission of Mauritius and hold an Investment Dealer (Full Service Dealer, excluding Underwriting) licence with licence number GB21026278. The Company operates as an Investment Dealer.

The Company registered office address C/o Accuvise Administrators Ltd, 7A Mayer Street, Port Louis, Republic of Mauritius.

The Company dedicates itself to providing a good customer service. Its clients are regarded as the top most priority and it will ensure it goes beyond their expectations.

The Company aims to deal with all complaints in a prompt and reasonable manner, ensuring that the concerned client (the “Client”) is made aware of the person dealing with the issues raised, and adherence to the procedures of this manual will ensure a consistent approach. The Client will be updated on the progress made toward resolving the complaint.

### **This complaint handling manual aspires to:**

- Give a structure concerning the way that the Company should deal with complaints from clients;
- Make sure that the Company is regular when dealing and solving complaints;
- Help the Company in finding solutions to flaws related to products and services;
- Recognise the main reasons behind complaints and in relation to this, make necessary amendments to the way of delivering services, improve the training program and administer corrective measures.

## 2. Definition of a Complaint

The definition of a complaint is any expression of dissatisfaction communicated to the Company from an eligible complainant, made either orally or in writing, whether justified or not.

*An expression of disapproval (rational or not rational) communicated to the Company through any medium. The disagreement can concern the following items related to Global Markets Dynamic Markets – Complaints Handling Manual – Dec 2022*



*Limited : a product, a service, an operation, non-execution of a service, long delays, mistakes, employee, faulty automated systems or client showing intention to go to higher management. It should be noted that a complaint is not a request nor a question about information.*

### **3. Categorisation of Complaints**

A Client may complain for a number of reasons. Any complaint received must be investigated by an employee with sufficient competence who, where appropriate, was not directly involved in the matter that is subject to the Client's complaint.

When dealing with a complaint, it is important to understand the jurisdiction where the regulated activity occurred against which the Client is complaining.

Any complaints in this respect must be dealt with by the Compliance Manager. Full details of a complaint must be emailed to him/her.

#### **Complaint Category Person / Area responsible**

1. Unsuitable/ misleading advice/ 'churning'
2. Delays and other administrative errors
3. Failure to Carry Out Instructions - (That has, or may, directly or indirectly lead to a financial loss for the client)
4. Switching/ Churning
5. Poor Client Service
6. Misleading Product Information

### **4. Handling Complaints**

#### Initial Receipt

When a complaint is received, the complaint should be dealt in a competent and rapid manner. The full details of the complaint must be passed to the Compliance Officer within 24 hours of receipt. If the complaint is made over the telephone, you must obtain as much detail as possible before passing the notes from the conversation and other relevant information to the person responsible.

#### Acknowledgement of the Complaint

Unless the complaint is of a 'simple nature' and can be resolved within 24 hours, a letter / email acknowledging the complaint must be sent within 48 hours of receipt. The aim of the Company is to confirm the registration of a complaint on the first communication from the client. The Company accepts all complaints on the same day that it is communicated by the client or on unusual circumstances on the next business day.



The letter / email should show the following:

- The name and job title of the person now dealing with the complaint;
- Their contact details;
- Expected timescale (if possible) to resolve the complaint and when the Client can expect to receive an update on progress.

#### Further Timescales

If the complaint has not been resolved within 15 days then a further letter should be sent to the Client stating:

- The present position with regard to the investigation into the complaint.
- An estimation (if possible) of how long it will take to bring matters to a conclusion.

*Note – The above represent the minimum business standards. It is expected that the Client will be contacted more frequently as appropriate given the nature of complaint made.*

#### Investigation of the Complaint

To enable the complaint to be addressed as soon as possible, the areas involved in both the sale and processing of the business may be asked to provide information and/or a report on the matter. These requests must be given priority. This will enable the complaint to be addressed appropriately.

All employees receiving customer complaints must adhere to the following principles:

- i. The client's complaint should be listened to and noted carefully;
- ii. Recognize the difficulties that the clients have experienced and apologize for them as representative of Global Markets Dynamic Limited;
- iii. If the details of the complaint are not clear, ask the client to be more precise or ask him to repeat the issues so that you record the complaint properly;
- iv. Converse with the client about the difficulty that you think the client has experienced;
- v. Make sure that you have the complaint recorded properly by interrogating the client several times so that he agrees with you that you noted down the situation accurately;
- vi. Take responsibility for the complaint you have recorded by making sure that you refer it to the proper department which is in charge to tackle the issue;
- vii. Put target as to when the complaint has to be resolved;



viii. Follow up and keep the customer aware of your progress. Be certain that the customer understands the final decision.

## 5. Record Keeping

All complaints received must be recorded on an internal database. The Compliance Officer will maintain a database of all referred complaints and should also maintain accurate records.

- It assists the business in meeting its applicable regulatory requirements;
- It enables the business to monitor the number of complaints being received;
- Any consultants that may require any additional training or coaching can be identified to ensure that they can meet the required business standards in the areas of advice, client servicing etc; and
- Any amendments that may be required to internal procedures arising from the number of recorded complaints can be identified.

Maintenance of internal record-keeping will be monitored by compliance on an ongoing basis.

## 6. Redress

Where redress is appropriate, any sum paid should aim to provide fair and reasonable compensation for any acts or omissions for which we are responsible and comply with any offer of redress which the complainant accepts.

No compensation may be paid unless prior sign-off has been obtained from the directors.

### Process

When communicating the level of redress to the client, an explanation should be provided on how the amount to be paid has been determined. The letter to be sent to the client must include the attached declaration for the client to sign and return. This declaration is a 'full and final settlement' document and will be provided on request. This is because the exact wording may vary slightly depending on the circumstances of the complaint.

The payment of any redress cannot take place until the signed declaration has been returned by the client.



## **7. Employee Awareness**

All relevant employees must be aware of our complaint handling procedures. A copy will be provided to advisers during their induction program.

## **8. Assessment of Complaints Handling Processes**

The way that the Company should deal with complaints will be assessed and reviewed every year.



COMPLAINTS REGISTER

DATE OF COMPLAINT: .....

COMPANY NAME: .....

CLIENT/COMPLAINANT'S NAME: .....

REPORTING PERSON: .....

DETAILS OF COMPLAINT: .....

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DATE REPORTED TO COMPLIANCE OFFICER/MANAGER: .....

ACTION TAKEN:

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DATES UPDATE PROVIDED TO CLIENT/COMPLAINANT: .....

_____	_____	_____
<b>Investment Dealer/Trader</b>	<b>Compliance Officer</b>	<b>Director</b>
Date:	Date:	Date: