

VARIANSE

ELECTRONIC TRADING. **ELEVATED**

1. Introduction

VDX Derivatives (hereafter “the company”) is incorporated, authorised and regulated by the Financial Services Commission of Mauritius (“FSC Mauritius”) via company licence number C118023323 (GBC1) and Investment Dealer Licence number C118023323, in the capacity of an Investment Dealer (Broker). VDX Derivatives is registered in Mauritius with company number: 164317 and the registered address at 24 St Georges Street, Port Louis, Mauritius.

2. Scope and Purpose

The Company is required to establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints or grievances received from complainants and keep records of each complaint as well as any actions taken by the Company to remedy the situation. This Policy sets out the method for the submission of complaints with the Company from its Clients and the processes followed by the Company’s personnel when dealing with such complaints.

3. Definitions

“Complaint” is defined as a statement or an expression of dissatisfaction addressed to the Company by a client (natural or legal person) regarding the provision of investment and/or ancillary services provided by the Company to the client.

“Complainant” is defined as any person, natural or legal, who has read, agreed with and accepted all the terms and conditions contained in the Client Agreement (without modifications), has opened a trading account with the Company and has lodged a complaint.

The Company considers having a complaint when the complainant has filled out the relevant Complaint Form, hereto attached as Appendix A, and submitted it to the Company via the following methods:

(a) By email at service@varianse.net

In case the Company receives a notification through the line of communication established by the Company to receive complaints, but which does not fall within the definition of “complaint” above and can be characterised as an enquiry, this shall be categorised as an enquiry rather than as a complaint and will be forwarded to the relevant department to be handled accordingly. The Complainant maintains the right to request for the re-classification of his/her enquiry as a complaint.

The current Policy applies to all registered clients & trading accounts opened with VDX Derivatives.

4. Complaint Handling Procedure

The Support Department and if necessary, the Compliance Department, shall efficiently handle any complaint received by a Complainant. In the case that the complaint is against the Compliance Department, the complaint shall be handled by a member of the Senior Management.

4.1 Procedure to be followed for Verbal Complaints

It is the Company’s Policy not to accept any verbal complaints or grievances. Should any of the Company’s employees (regardless of department) receive a verbal complaint or grievance, the following procedure must be followed:

- 4.1.1 The employee receiving the verbal complaint or grievance shall take all the necessary actions so that the complaint or grievance is properly addressed. The said employee will inform the Complainant that all complaints or grievances must be made in writing by completing the relevant Complaint Form, hereto attached as Appendix A, and submit it to the Company via email to service@varianse.net. Once the Complainant completes and submits the Complaint Form, in the manner described above, the Procedure for Written Complaints shall be followed as described in paragraph 4.2.
- 4.1.2 If the Complainant submits the Complaint Form to his/her Account Manager then the complaint or grievance, in the form that has been received, must be forwarded to service@varianse.net within the same working day.
- 4.1.3 Subsequently, a member of the Support Department will inform the Complainant that his/her complaint or grievance has been forwarded to service@varianse.net, providing all details so that the Complainant is aware who is dealing with his/her complaint or grievance.
- 4.1.4 The support department, in addition to the above, should make all best efforts to ensure that in the case of the complaint or grievance being of such nature that can be resolved immediately, to do so that the client will not have to pursue the filing of a formal complaint. The support department in such a case shall not:
- Commit themselves in any way to the client
 - Address any issues relating to legal issues
 - Commit the Company in taking any action prior to examining the issues in a formal manner

4.2 Procedure to be followed for Written Complaints

When a written complaint is received, in the manner described in section 3, the procedure which shall be followed by the Company is the following:

- 4.2.1 If the complaint was not received in the manner described in section 3 (i.e. the complaint was received through internal channels of communication such as chat, client correspondence, or by a member of the Back Office Department or by a Sales Agent or an Account Manager or by any other employee of the Company) then the complaint, in the form that has been received, must be forwarded, in the form it has been received, to service@varianse.net within the same working day.
- 4.2.2 Once the Complainant submits a written complaint, a member of the Support Department will send an electronic acknowledgment of receipt to the Complainant's registered email address within five (5) working days following receipt, to verify that the Company has received the written complaint and will request the Complainant to complete the relevant Complaint Form, hereto attached as Appendix A.
- 4.2.3 Upon completion and submission of the Complaint Form, a member of the Support Department will investigate the grounds of the complaint and if, based on the information provided, the grievance does not fall within the definition of "complaint" or is not considered to be a complaint it will be categorised as an enquiry and will be forwarded to the relevant department to be handled appropriately.
- 4.2.4 If the grievance falls within the definition of complaint or is considered to be a complaint, then the Head of the Support Department or a member of the Support Department will register the complaint to an internal register by giving it a unique reference number which will be communicated to the Complainant within five (5) working days.
- 4.2.5 In addition, a member of the Support Department shall inform the Complainant of the following:

- That the Complainant must use the given reference number in all future correspondence with the Company regarding the submitted complaint
 - The process which is followed when handling a complaint
 - Who is the department that is dealing with his/her complaint and their contact details
 - What is the indicative handling time (i.e. 15 working days)
 - That the complaint handling procedure is free of charge
- 4.2.6 Moreover, the following information should be obtained by the Client and recorded:
- The client's full name and surname
 - The client's trading account number
 - The affected transactions (if applicable)
 - The date that the issue arose and a description of the issue
 - The service provided by the Company and related to the complaint
 - The content of the complaint
 - The magnitude of the damage claimed by the complainant
 - Reference of any correspondence exchanged between the Company and the complainant
- 4.2.7 The Company will thoroughly examine and assess the following:
- The facts and the information provided by the complainant
 - The facts and the information provided by the department responsible for the provision of those services (if applicable)
 - The information/data which have been retrieved from the Company's archive (i.e. the complainant's transactions, trading history, correspondence, electronic email, recorded telephone calls, IT data etc)
 - The events leading to the complaint
- 4.2.8 The Company will not handle or investigate a complaint if the Complainant does not complete the Complaint Form, hereto attached as Appendix A, or does not provide the information requested in paragraph 4.2.6. of this Policy. In such an event the Company shall revert back to the Complainant and request him/her to send any additional information. In any event, one of the Company's officials may contact the Complainant directly in order to obtain further clarifications and information relating to his/her complaint. The Company shall need the Complainant's cooperation in order to handle the complaint.
- 4.2.9 The Company upon examining the complaint and reaching a decision to this respect shall inform the Complainant about the Company's decision, in writing and in plain language which is clearly understood, together with the reasoning of the Company's decision and any remedial measures it intends to take (if applicable).
- 4.2.10 The Company shall make every effort to resolve the complaint within fifteen (15) working days. When deemed necessary, the Support or the Compliance Department shall convey the complaint to the Senior Management for further investigation. In this case, the Company might take additional time to finalise the reply. The Senior Management shall investigate further and coordinate with relevant heads of departments to attend to the subject of the complaint.
- 4.2.11 In the event that the Company cannot provide a response to the Complainant within the handling time given to the complainant, it will keep the Complainant informed about reasons of delay and indicate when the investigation is expected to be completed. This period of time should not exceed two months from the submission of the complaint.
- 4.2.12 Once the complaint is concluded the Head of the Support Department will keep an electronic record of the complaint received, detailing the course of action which was taken, including what information, data and evidence were gathered, what measures were taken for the complaint's resolution, whether any conflicts of interest between the Company and its clients and between other clients were identified, what was the outcome and how that outcome was reached.

- 4.2.13 Moreover, the Head of the Support Department will Analyse, on an on-going basis, complaints handling data, in order to identify and address the causes of the individual complaints and/or any recurring or systematic and/or any potential legal and operational risks. Subsequently the relevant person or department should be informed and if necessary, take corrective action.
- 4.2.14 The present Complaints Handling Procedure Policy will be uploaded on the Company's official website.
- 4.2.15 The Complaints Handling Procedure Policy is available to all the Company's personnel through email and an internal folder in the Company's channels of communication which can be accessed at any time without any restrictions.

5 Record Keeping of Complaints

The Company shall maintain record of all complaints for a minimum period of five years after the closure of the client's trading account. The responsible department shall be the Support Department.

VDX Derivatives take all complaints very seriously and we have established a complaint handling procedure. Upon receipt of the complaint form duly completed, a thorough investigation of your claim(s) will be conducted with full priority an answer will be provided to you within 15 days from the day of collection of all necessary information from you. If you have any questions or concerns, please feel free to contact our Customer Support Department service@varianse.net.

Full Name	
Address	
Telephone	
Email	
ID / Passport No.	
Account No.	
Nature of the Complaint	
Date event took place	
Date you noticed the problem	
Did you communicate with Customer Support about the problem? (If so, please include the date, name of the person and outcome)	
Have you communicated the issue with any third party? (If yes, include date, name of person and outcome)	
Summary of complaint (please include all supportive documentation to your complaint, if available)	