

COMPLAINTS POLICY

JIN DAOCHENG LTD

DECEMBER 2019

VERSION 1.1

1. Introduction

The purpose of this Policy is to set out the procedure to be followed and the appropriate action required to be taken by Jin Daocheng Ltd. (“JDC”, the “Company”, “we”, “us”, “our”) in the case of a complaint by any client to ensure the Company’s compliance with paragraph 13 of Directive DI 144-2007-01 of the Cyprus Securities and Exchange Commission for the Authorisation (hereinafter “CySEC”) and Operating Conditions of the Cyprus Investment Firms.

Definitions

“**Complainant**” means any person, natural or legal, which is eligible for lodging a complaint to the Company and who has already lodged a complaint.

“**Complaint**” means a statement of dissatisfaction addressed to the Company by a complainant relating to the provision of investment services.

The Company shall establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints received from retail or potential retail clients, and to keep a record of each complaint and the measures taken for the complaint’s resolution.

In addition, the Company is required to:

- Apply a complaints management policy, which is defined and endorsed by the senior management and the board of directors, who will be responsible for its implementation and for monitoring the Company’s compliance with it.
- Ensure that it has a complaints management function, which enables complaints to be investigated fairly and possible conflicts of interest to be identified and mitigated.

2. Complaint Submission

A complainant shall complete the Complaint Form provided by the Company (available on **Appendix 1** of this Policy). Once completed, it should be sent either in a hard copy along with a copy of the complainant's identification document and any additional documentation that would be relevant to the complaint to the Company’s head offices which are situated at [36 Pafou Street, 1st floor, Office 101, Limassol, 3052, Cyprus](#) or by e-mail to compliance@jdcmarkets.com. Complaints made by the Clients cannot be considered unless the Complaint Form is duly completed with all the required information and it is accompanied by adequate supporting evidence (as required) for the Client’s claims.

3. Complaint Handling

Upon receipt of a duly completed Complaint Form, the matter will be recorded as an official Complaint. The Company shall send a written acknowledgement letter/email (within five working days) from the day of receipt of the complaint to inform the complainant that the complaint is under investigation, providing complainant with unique reference number which shall be quoted in all communications with the Company regarding the complaint.

The Company will attempt to resolve the Complaint within three (3) months from the time received. During the investigation of a Client Complaint, the Company takes into account the subject matter of the Complaint, the contents of the duly completed and signed Complaint Form, the evidence the Client has provided, and the evidence in our records.

As part of our investigation we may share and receive information (including personal, financial and trading data) regarding a Client complaint with/from third parties (e.g. with the CySEC, the Financial Ombudsman of Cyprus, our legal advisors or with another subsidiary company) in line with our Privacy Policy and the client Agreement, if applicable.

Further clarifications and information relating to the Complaint may be requested from the Client within the three (3) months' time-frame, as necessary. In the event that the Client takes more than seven (7) working days to respond to a communication, the three (3) months' timeframe might be extended by the number of days in addition to the seven (7) working days that the Client took to respond.

Once a Complaint's investigation is completed, a Final Response shall be issued to the Client with the investigation's outcome(s) together with any required explanations and any remedy measures the Company intends to take.

A Final Response is a written response from the Company which either:

- (a) accepts the Complaint and, if appropriate, offers redress (appropriate redress may not involve financial redress, in accordance to the Company's policy to resolve complaints in amicable and good business terms);
- (b) offers compensation without accepting the Complaint, as a gesture of goodwill and in accordance to the Company's policy to resolve complaints in amicable and good business terms; or
- (c) rejects the complaint and gives reasons for doing so. Further clarifications on the Final Response may be provided following Client's subsequent communication with the Company.

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A Complaint will be deemed as resolved or settled where the Company has sent in writing a Final Response and/or further clarifications on the Final Response to the Client.

Moreover, should a Client fail to reply to any communication from the Company (including the Final Response) for a period of greater than one (1) month, the Company will issue a final response on the basis of the available data and information and consider the complaint resolved.

If the Company is unable to resolve a Complaint within two(2) months, the Company will update the Client on the status of his/her Complaint and will continue to do so until such time as the investigation is complete.

According to applicable regulatory obligations, the Company has maximum three (3) months from the day of the Complaint to response/resolve the complaint. It is understood that the Client's right to take legal action remains unaffected by the existence or use of any complaints procedures referred to above.

In addition, if the Client remains dissatisfied with the Final Response of the Company or in case of no Final Response within the three (3) months' time-frame, he/she may be entitled to take his/her complaint to the Financial Ombudsman of Cyprus, by quoting his/her Complaint's unique reference number.

4. Disclosure and Update of the Policy

The Complaint Form is accessible to clients and potential clients online at all times. The form can be viewed and downloaded from the Company's website through the path: Menu > Legal Documents > Complaint Form.

This Policy shall be regularly reviewed and updated by the Compliance Function in consultation with the Complaints Department and in line with applicable legislation updates, and each updated version shall be approved by the Company's Board of Directors, as needed.

5. Records and Reporting

The Company is required to keep and continuously update records of all the Complaints received by Clients with details of the investigation conducted, the final outcome of these, any remedy measures undertaken and all the communication with the Clients.

The Complaints Department shall maintain the appropriate records in this respect and the Compliance Function shall regularly monitor and review the Company's compliance with the applicable regulatory requirements for handling Client Complaints and the record-keeping held by the Compliance Department.

Moreover, the Compliance Function shall report on monthly basis to CySEC information regarding Client complaints filed with the Company.

6. Appendices

Appendix 1 – Complaint Form



COMPLAINT FORM

Reference (for internal use): _____

Client's Name: _____

ID/Passport No: _____

Email: _____

Client's Country: _____

Account ID: _____

Transaction No.: _____

Disputed Amount: _____

Complaint Event Date: _____

Description: _____

Select **one** of the below that applies to your complaint:

Financial Instrument:

- 1) Shares/Stock/Equities
- 2) Bonds/Debentures/Loan Stock/DebtSecurities
- 3) Structured Securities (including securities with capital protection and structured funds)
- 4) Money -MarketSecurities
- 5) Mutual Funds/UCITS (excluding structured funds)
- 6) Options, Futures, Swaps, Warrants, Forward rate agreements and any otherderivatives
- 7) Financial contracts fordifferences
- 8) Other investment products/Funds (please specify below)

Complaint Cause:

- 1) Execution of orders (e.g. delay in execution, re-quotes, slippage, erroneous trades etc.)
- 2) Investment advice (e.g. Unsuitableadvice)
- 3) Portfolio Management
- 4) Quality or lack of information provided to the Client
- 5) Terms ofcontract/fees/charges
- 6) General admin/customer services (including custody/safekeepingservices)
- 7) Unauthorised business being offered or carriedout
- 8) Issue in relation to investor's withdrawal of investor'sfunds

Please enclose any evidence and relevant documentation.

Submit the form to compliance@jdcmarkets.com or fax at [+357 25 26 09 99](tel:+35725260999) or by mail at [36 Pafou Street, Vladimiros Court, 1st Floor, Office 101, 3052, Limassol, Cyprus](#)

Date: _____

Signature: _____

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