



Complaints and Dispute Resolution Policy

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1. Introduction

Direkt Prime Liquidity (“DPL”) is a trading name of MMCD Resources Limited (a company incorporated in Seychelles under company number 8426976-1 and FSA registration number SD069) whose registered office is at Suite 3, Global Village, Jivan’s Complex, Mont Fleuri, Mahe, Seychelles.

The Complaints and Dispute Resolution Policy (hereinafter the “Policy”) regulates Company’s procedures and policies to ensure effective, clear, and prompt handling process of complaints submitted to the Company.

The Company maintains Records of Complaints and measures taken for expedient complaint resolution in line with the applicable Seychelles Laws, Rules and Regulations.

2. Definitions

A. Inquiries

If you are disappointed with the Company’s services, or you would like assistance with inquiries of a general nature, regarding your account or trading activity with us, you may contact our Customer Support via live-chat, email or telephone. Inquiries can be received via phone, letter, email or by any other form of communication. You must tell us as soon as possible about any dispute – the sooner you inform us, the easier it will be to resolve the matter. In the first instance, you should try to resolve your dispute through the usual customer service channels, as they are able to resolve the vast majority of disputes and very often issues arise as a result of misunderstandings and can be easily resolved.

You will be asked to provide full details of your issue (for example the date and time of the disputed trade). The more information you provide, the easier it will be to resolve the matter. Customer service team will endeavour to resolve all such matters as soon as possible but in any event within two business days.

If our customer service team is unable to resolve the matter or you feel that our service has not met your expectations and you wish to make a complaint, you may raise this further with the Complaints handling staff following the process indicated in the following section. Their role is to independently review all complaints constructively and sympathetically, ensuring that where we are at fault, things are put right at the earliest opportunity.

B. Complaint(s)

Complaint(s) are defined as specific requests or claims related to the performance, services or products of the Company, which objects the performance or expresses negligence of the Company and lodges a relevant, specific and clear demand.

Any expression of dissatisfaction or concern about a service or product provided by the Company, or the conduct of the Company in the performance of any regulated activities, where a response or resolution

is explicitly expected, shall constitute a complaint.

Asking an opinion or position about any specific case or requesting general information about the operation and services of the Company shall not constitute a complaint.

Once a complaint is submitted, the Company applies effective filing procedures, as well as policies on handling, resolving, and reporting data.

C. Complainant

The Complainant could be any party, natural or legal person, who acquires or intends to acquire financial services or products from the Company.

When the complaint is submitted by a representative or other duly authorized person, the Company will investigate the legal basis of the submission, which must be presented by the Complainant in a format required by law. If no authorization is available, the Company will approach the Complainant directly in order to accelerate the procedure.

3. Submitting a Complaint

The Complainant, if possible, should report the event or the date of the occasion subject of the complaint to the Company, as soon as possible. This is necessary to enable the Company to investigate the complaint as efficiently as possible.

Complaints shall be submitted in writing to the following email address: compliance@dpl.sc.

The Complainant shall forward to the Company a completed and signed Complaint Form, as indicated in "Appendix 1" of this Policy. The Complaint submitted should include truthful, complete and accurate information. The Complainant can also use supporting documentation to accompany his/her Complaint.

The Company may accept complaints brought by third parties acting on behalf of a Customer (Authorised Representatives), as long as the Complainant authorised in writing the third party and provides this authorisation as evidence to the Company via his/her registered email. When the Complaint is submitted by a representative or other duly authorized person, the Company will investigate the legal basis of the submission, which must be presented by the Complainant in a format required by law. If no authorization is available, the Company will approach the Complainant directly, in order to accelerate the procedure.

4. Acknowledging your Complaint

The Company will acknowledge receipt of complaints within twenty-four hours (24) from the receipt of the complaint and provide unique reference number to the complainant. As part of the acknowledgement, complainants will be advised on the timeframe for receiving a response. The acknowledgement of complaints shall be on paper or on another durable medium with the ability to be stored, including digital means. The unique reference number should be used in all future contact with the Company. The unique reference number allows complainants to follow up on the status of their

complaint at any point.

5. Complaint Handling Process

The Company ensures that the Complaint Handling Process remains transparent, and that complaints handling staff declares any conflict of interest that arises pertaining to complaints received. In these cases, where possible, another employee should be appointed to handle the case. In cases where the employee with the conflict of interest is the only one available to handle the complaint, or has to eventually approve decisions made in relation to the complaint, the employee may still handle the matter, as long as the conflict of interest is properly declared.

As part of the complaints handling procedures, the topic of confidentiality should be addressed, where it is made clear that confidentiality around complaints received from customers or persons acting on behalf of customers should be maintained at all times.

Company's procedures and policies should be reviewed on a yearly basis or as the need arises, in order to ensure that the Complaints Handling Process remains efficient and effective.

6. Managing and Assessing Complaints

The Company manages all complaints and Complainants equally, without any discrimination, in harmony with the procedure regulated by this Policy.

The Company follows the outlined procedures to ensure that the complainant's complaint is resolved within a period of a maximum of thirty (30) business days. This response, including the reasoning, is always sent in writing to the Complainant to his provided email address. Some Complaints can be resolved more quickly depending on the facts and the nature of the Complaint. In principle, the Company will reply to the complainant, within 21 business days if related to the domestic market and 30 business days for complaints related to the international market.

If the Complaint is more complex and takes longer than thirty (30) business days to be resolved, the Company will communicate the reasons for the delay. Sometimes the complainant is requested to supply additional information required for investigating the complaint. The timeframe by when complainants can expect to receive a response shall be communicated to them.

When the complaint is submitted by another person or with a method unsuitable for establishing proper authorization of the submission, the Company may ask the person authorized to submit the complaint to confirm the complaint in question.

The Company adds an adequate, clear and unanimous reasoning to every decision brought down in order to settle complaints, which shall be emailed to the Complainant in writing. If the decision refers to a legislation, not only the legislation, but also relevant regulations must also be included in the above reasoning.

7. Monitoring of Complaints and Record Keeping

The Company shall collect the necessary information needed and avoid the unnecessary collection of data in regards to the complainant with the exception of recording data aimed to settle the complaint.

All personal particulars obtained in relation of managing the complaint shall not be deleted from records nor made unsuitable for identification for a period of not less than seven (7) years.

8. Additional Information on Queries and Complaints

The Company may require at any given time during the examination and handling of complaints from the complainant to provide additional information, clarifications and/or documentation in order for the Company's investigation to be concluded.

The Company may decide to extend the investigation timeframe, or put the matter on hold, or consider the matter as closed if the complainant fails to respond adequately and/or within a reasonable timeframe or within the designated timeframe.

We encourage the complainant to lodge his / her complaint within a reasonable time from the moment the matter occurs. The Complainant, if possible, should report the event or the date of the occasion and the subject of the Complaint to the Company, as soon as possible. This is necessary to enable the Company to investigate the Complaint as efficiently as possible.

Please note that the Company shall consider your complaint as closed and cease the relevant investigation in case you fail to respond to our officers within the period of three (3) months from the date of the request for more information from the officers.

The Company shall notify the Complainant upon the closure of his/her complaint.

9. Responsibilities of the Company's Staff in Receiving Complaints

Employees of the Company responsible for complaints process shall receive and manage all complaints within the Company. They may assist the Complainant in compiling and submitting the Complaint in case he / she faces difficulties.

10. Settlement of Disputes

When disputes between the Company and the Complainant cannot be settled by the official procedure, or the client is not satisfied with the resolution proposed by the Company, regulations of chapter "Settlement of Disputes" of the Company Rules and Regulations shall be applicable.

A Complaint Guideline can be found on the website of the FSA: <https://fsaseychelles.sc/complaint-handling>, containing details on how a client can proceed and file complaints regarding the way in which

the Authority carries out its functions.

Financial services Authority (FSA):

Name: Financial Services Authority
Email address: complaints@fsaseychelles.sc

Telephone Number: +248 4380800

Name: Fair Trading Commission
Email address: <https://ftc.sc/consumer-protection/lodge-a-complaint/>

Telephone Number: +248 4 325 250

When the complaint is rejected, the Complainant may lodge an appeal to the Fair Trading Commission (FTC) through <https://ftc.sc/consumer-protection/lodge-a-complaint/>. FTC will evaluate the complaints received and inform the FSA of the case so that the required enforcement action may be taken.

Appendix 1

COMPLAINTS FORM

This is the form you need to fill in if you wish to submit your complaint to MMCD Resources Ltd (the "Company"). Complete, up to date as well as accurate information is required to be provided to the Company for the proper investigation and evaluation of your complaint.

Please note that the below Complaints Form is only indicative and not exhaustive.

The Company may request further information and/or clarifications and/or evidence as regards your complaint.

CLIENT INFORMATION

Date of submission:	
Name:	
Surname:	
ID or Passport Number:	
Country of nationality:	
Legal Entity Name (in case the Client is a legal person):	
Account Trading Number:	

CONTACT DETAILS OF THE CLIENT

Postal Address:	
City/Province:	
Code:	
Country:	
Telephone Number:	
Email:	

DETAILS OF THE COMPLAINT

Date when the Complaint was created:	
Employee who offered the services to the Client (if applicable):	
Description of the Complaint:	

I hereby certify and confirm that to the best of my knowledge, the information furnished above is true, accurate, correct and complete.

FOR OFFICIAL USE

DATE RECEIVED:	Click or tap to enter a date.
RECEIVED BY:	Click or tap here to enter text.
DATE ACKNOWLEDGED:	Click or tap to enter a date.