



COMPLAINTS HANDLING POLICY

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Overview

This policy sets out how you can make a complaint, how we will handle it, and the steps available to you if you are not satisfied with our response or the time taken to resolve the matter.

We recognise the importance of having a fair, transparent, and efficient complaints-handling process, and we are committed to addressing concerns in a timely and customer-focused manner. While we respect your right to raise a complaint, we also ask that all interactions with our staff are conducted with courtesy and respect.

The purpose of this Complaints Policy is to provide clear guidance on how complaints are managed, ensuring consistency, fairness, and accountability throughout the process.

What is a complaint?

A **complaint** is any expression of dissatisfaction made to or about us, relating to our products, services, staff, or the way we have handled a previous complaint, where a response or resolution is explicitly or implicitly expected, or is legally required.

A complaint does not include:

- Employment-related matters raised by STARTRADER staff.
- General feedback or comments where no response is expected (e.g., survey responses).
- Hardship notices or requests to postpone enforcement proceedings.

Examples of complaints include, but are not limited to:

- Dissatisfaction with the handling of a withdrawal or deposit.
- Concerns about the execution of trades or platform functionality.
- Complaints regarding the conduct of staff or communications received.
- Dissatisfaction with the outcome or timeliness of a previously lodged complaint.

How to make a complaint

You can make a complaint to us by way of email to the following email address:

- Email: trading@startrader.com

When submitting your complaint, please include the following details to help us address it efficiently:

- Your full name.
- Your preferred contact method (e.g., phone, email).
- A clear description of your complaint.
- What outcome or resolution you are seeking.

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How we will deal with your complaint

Acknowledgement

We will acknowledge receipt of your complaint and aim to resolve it as quickly as possible.

Generally, where your complaint is made:

- **In writing** – by email or via live chat, we will acknowledge your complaint in writing within **seven (7) calendar days**, or as soon as practicable thereafter.
- When acknowledging your complaint, we will also have regard to any preferences you have communicated in relation to the way in which you wish to be contacted. At the time of acknowledgement, you will be provided with a **complaint case number** for reference in any future communications regarding your complaint.

Our Handling Process

We will provide you with our written reasons for the outcome of your complaint (an Internal Dispute Resolution Response, or IDR Response) within **thirty (30) calendar days** of receiving your complaint, subject to applicable regulatory requirements.

During the investigation, STARTRADER may request that you provide additional information, documentation, or evidence necessary to enable a thorough review and verification of the issues raised. You are expected to reasonably cooperate with such requests to facilitate an efficient and timely resolution.

Throughout the investigation, we will keep you informed of our progress and provide updates at reasonable intervals, and no later than every **fifteen (15) calendar days** until the matter is concluded. Our aim is to ensure that all complaints are reviewed carefully, fairly, and with due consideration of the facts, so that an appropriate resolution can be reached.

If it is not possible to conclude the investigation within thirty (30) calendar days after receiving the initial complaint, STARTRADER will inform you in writing before the end of this period, explaining the reasons for the delay and requesting a further extension of time. Any such extension shall not exceed an additional **thirty (30) calendar days**, unless otherwise required or permitted by law.

All complaints will be treated confidentially, except where disclosure is required by law, regulation, or to facilitate resolution (e.g., with the Financial Commission or other relevant authorities).

Once the investigation is completed, you will be advised of the outcome as soon as possible. Where a substantive written response has been provided, and in the absence of further communication from you within **ten (10) working days**, STARTRADER may treat the complaint as closed, unless otherwise required by law or regulation.

Our IDR Response

If we do not uphold your complaint, whether in whole or in part, our IDR response will:

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- Clearly identify and address the issues you raised in your complaint;
- Set out our findings on the material facts, with reference to the relevant supporting information; and
- Provide sufficient detail to enable you to understand the reasons for our decision, so that you can determine whether to escalate the matter to the Financial Commission (FC) or any other external dispute resolution body or regulator, as applicable.

We are not required to provide you with a formal IDR Response if:

- Your complaint is resolved to your complete satisfaction within **ten (10) calendar days** (or such shorter period), and you have not requested a written response;
- Within **ten (10) calendar days** of receiving your complaint, we have provided you with an explanation in circumstances where no further action can reasonably be taken, in accordance with applicable regulatory requirements; or
- The complaint has otherwise been addressed and closed by mutual written agreement between you and STARTRADER.

In all cases, you retain the right to request a written IDR Response.

Delay in providing a IDR Response

If we are unable to provide you with our IDR response within the required timeframe due to the complexity of your complaint or circumstances beyond our control, we will write to you before the due date to:

- Explain the reasons for the delay;
- Provide an expected timeframe for resolution (not exceeding the limit of thirty (30) additional calendar days, where applicable); and
- Inform you of your right to escalate the matter to the Financial Commission.

Examples of circumstances beyond our control include, but are not limited to:

- You are unable to respond due to illness, travel, or extended absence;
- Information must be obtained from third parties, and such information is necessary to substantiate your complaint or claim;
- Delays in receiving essential documentation (e.g., bank statements, payment confirmations, or identity verification documents);
- System outages or technical failures that affect access to records or data;

Escalating your complaint

We will also inform you of your right to escalate your complaint to the Financial Commission (“FC”), which provides STARTRADER clients with an independent dispute resolution service. If you

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remain dissatisfied with our final response, you may lodge your complaint directly with the FC by completing the [Dispute Resolution Form - Financial Commission](#) available through the Financial Commission. The FC will review your complaint in accordance with its rules and procedures and provide an impartial determination.

In addition, depending on the jurisdiction in which you are onboarded, you may also have the right to escalate your complaint to the relevant financial regulator or external dispute resolution body applicable in that jurisdiction. Details of the appropriate authority, including contact information, will be provided to you upon request or as required by law.