



Complaint Handling and Processing Policy

Date updated: July 2023

This document seeks to outline the policy relating to the complaints handling process of Goliath Trading Limited, which is registered and regulated by the Financial Services Authority of Seychelles under license number SD138 with registered office at Room B11, First Floor, Providence Complex, Providence, Mahe, Seychelles and registered trade name Titan FX (hereafter referred to as Titan FX, we, us, our).

1. INTRODUCTION

The policy ensures that Titan FX deals with clients honestly and fairly, in a consistent and ethical manner and to ensure that the client has access and information available to best resolve problems, complaints or disputes in a timely manner.

In this respect, the Company has established this Complaints Handling Policy (the "Policy") that sets out the process adopted by the Company for the fair and prompt handling of queries, complaints and disputes received from Company's clients, as well as a robust framework comprising of, procedures, processes, controls and monitoring processes, to ensure prompt handling of Clients' complaints. This Policy describes, amongst others, the process that clients will need to follow in order to submit a query and/or complaint to the Company.

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

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. Any necessary changes to the procedures should be reflected in this Complaint Handling Policy Report.

A client's inquiry for information or other types of assistance shall not be treated as a complaint until the client submits an official complaint with the Company as per the applicable procedures described within this Policy when the inquiry for information or other types of assistance is not resolved to the client's satisfaction.

2. SUBMITTING A COMPLAINT

Titan FX wants to know about any problems that you may have with the services provided to you so we can take steps to resolve the issue. If you have a complaint about the financial product or service provided to you, please lodge your complaint by:

1. Contacting a Titan FX representative on +678 27504; or
2. Email or write to us on support@titanfx.com.

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 client can also use supporting documentation to accompany his/her Complaint. The information required through the Complaint submitted is indicative and additional information and/or clarification and/or evidence might be requested, for the Company to be able to handle/tackle the Complaint promptly and efficiently.

When lodging a complaint, please include the following information:

- a. Your trading account number
- b. Your name and surname
- c. A description of the problem and affected transaction number (if applicable)
- d. The date and time you encounter the issues being the subject matter of the complaint
- e. Your primary contact information regarding this complaint

The Company may accept complaints brought by third parties acting on behalf of a client (Authorized Representatives), as long as, the client authorized 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 an Authorized 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.

2. ACKNOWLEDGING YOUR COMPLAINT

Once your complaint is lodged, we will contact you within twenty four (24) hours from the lodging of the complaint with a unique reference number for your complaint and the details of the person who will be your contact person within the Company regarding your complaint.

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 and will allow complainants to follow up on the status of their complaint at any point.

3. COMPLAINT HANDLING PROCESS AND RESPONSE TO THE COMPLAINANT

The Company offers complaint handling services which are accessible, independent, fair, accountable, timely and efficient. Complainants shall be able to file complaints and receive the above services for complaints free of charge.

The Company is mandated to carry out a root cause analysis on complaints received, so that larger issues may be identified and addressed, as well as actions that are taken to rectify the issue.

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 clients or persons acting on behalf of clients should be maintained at all times.

Following acknowledgement of receipt of the complaint, the Company will carry out an impartial review of the matter and communicate to the complainant the outcome of the Company's investigation and propose remedial actions (if applicable) within thirty (30) working days from the date of the Company's acknowledgement. If for any reason this will not be possible, we will write to you advising you of this. At the latest, your complaint will be dealt with within 60 days from the date of the Company's acknowledgement.

The Company adds 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 (if applicable).

4. ADDITIONAL INFORMATION ON COMPLAINTS

The Company may require at any given time during the examination and handling of complaints the client to provide additional information, clarifications and/or documentation and the client's full cooperation 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 client fails to respond adequately and/or within a reasonable timeframe or within the designated time frame.

We encourage the client to lodge his/her query and/or 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.

The Company is entitled to treat a Complaint as closed in the following circumstances, among others:

- where it is determined that no further action is required by the client and/or the Company, upon the issuance of the final decision by the Company, and/or
- where the matter has been mutually resolved, and/or
- where the client has failed to respond promptly and adequately to the questions and requests of the Company, and/or

- where the Company has given a substantive response and the client has failed to indicate that the response is unsatisfactory and/or substantiate the claim with relevant data, within a reasonable timeframe.

The Company shall notify the client upon the closure of a complaint.

5. REGISTRATION OF COMPLAINTS AND RECORD KEEPING

The Company shall keep a Complaints Register to register all complaints until they are dealt with. Details need to be recorded on the Complaints Register include the following:

- i. Client Name;
- ii. Date Received;
- iii. Service Complained About;
- iv. Brief Details of Complaint;
- v. Type of Complaint and Method Receipt;
- vi. Titan FX Limited Representative taking lead on handling the complaint; and
- vii. Action Taken (Remedy, Determination, Result).

The Company shall only 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 to managing the complaint shall not be deleted from records nor made unsuitable for identification for a period of not less than seven (7) years.

The Company manages Complaints within a transparent system; that can be traced and administered in each and every stage of the procedure.

The Company shall be entitled to prepare statistics and reports about Complaints, which will be aimed to improve the efficiency of administering Complaints.

6. COMPLAINT REPORT TO THE BOARD OF DIRECTORS

A summary report of all complaints received and resolved must be presented on a quarterly basis to the Board of Directors and should also be reflected in the regulatory quarterly report. The report should include the following details:

- Number of complaints and their causes

- Products/Services and distribution points which generated the most complaints
- Time for resolution of complaints
- Number of complaints upheld and denied
- Compensation provided
- Recommendations which may help address/prevent issues which have arisen

7. SETTLEMENT OF DISPUTES

When disputes between the Company and the Complainant cannot be settled by the official Company procedure, the Complainant may source alternative routes to lodge his/her Complaint.

If further to the investigation conducted by the Company, the Complaint of the client is rejected by the Company and/or is not resolved, the Complainant may lodge an appeal to the Financial Services Authority, in order for the required enforcement actions to be taken.

More information for the Customer is accessible via the Financial Services Authority website <https://fsaseychelles.sc/complaint-handling> and also below:

Financial Services Authority (FSA):

It is mandatory for complainants to fill in the Complaints Handling Form before any complaint is investigated by the FSA.

All the information indicated on the form must be provided. The Complaint Handling Form, which is available on the FSA website can be submitted by any of the following ways:

1. Email address:

complaints@fsaseychelles.sc

<p>2. Formal letter addressed to:</p>	<p>The Chief Executive Officer</p> <p>Policy (Information & Communication Unit)</p> <p>Financial Services Authority</p> <p>Bois De Rose Avenue</p> <p>P.O Box 991, Victoria</p> <p>Mahé, Seychelles</p>
<p>3. Hand-delivered directly to the Authority:</p>	<p>Bois De Rose Avenue, P.O. Box 991, Victoria, Mahe, Seychelles</p>
<p>Link to complaint handling form</p>	<p>https://fsaseychelles.sc/other-fsa-documents/complaint-form/download</p>

Appendix 1: COMPLAINT FORM

TITAN FX- Complaint Form

A. CLIENT INFORMATION

NAME:	ACCOUNT NUMBER:
ADDRESS:	TELEPHONE NUMBER:

B. BRIEF SUMMARY OF THE COMPLAINT

Please describe the product or service you are complaining about (description, evidence, amount and suggested way to be solved):

Please enclose relevant documentation that may help the Company to handle this complaint. The documentation to be provided by the Client are the client's statement, correspondence with the Company and any other supporting documentation that may be requested by the Company which is relevant to the Client's complaint.

DATE AND PLACE

CLIENT'S SIGNATURE

FOR INTERNAL USE ONLY:

Complaint Reference number:	
Date of Complaint Received:	
Employee and Department that received the Complaint:	

Acknowledgment Sent To Client:	YES, NO and date
Informed Client of Initial Action:	YES, NO and date
Final Response Provided To Client:	YES, NO and date
In summary, the content of the reply of the Company to the said Complaint:	

Holding Response Provided To Client:	YES, NO, N/A
Signature Of Compliance Officer:	DATE:

Appendix 2: Monitoring Procedure Table

	Procedure	Completed
1.	<p>Register complaint lodged in the Complaints Register and stating clearly what mode of communication used to lodge the complaint.</p> <p>The date when the complaint is received must be registered in the Complaints Register immediately.</p>	
2.	Wherever possible, a complaint should be investigated by a staff member who is not involved in the subject matter of the dispute.	
3.	Once received, a staff member should send an acknowledgement to the complainant.	
4.	<p>Complaints may be made verbally or in writing. It is important to clearly state in the Complaints Register what mode of communication was used to make the complaint. The following procedure must be followed when a complaint is received orally:</p> <ul style="list-style-type: none"> (a) Identify yourself, listen, record details and determine what the complaint wants. (b) Confirm the details received. (c) Empathize with the complainant in a courteous manner. (d) Explain the courses of action available. (e) Do not attempt to lay blame or be defensive. <p>Resolve the complaint, if possible, or commit to doing something immediately, irrespective of who will alternatively handle the complaint.</p>	
5.	Following the notification and registration of the complaint, a written acknowledgement of receipt will be sent to the complainant within	

	<p>twenty-four (24) hours. The notification must outline the process as per the dispute resolution procedure and that they can refer the matter to the Seychelles Financial Services Authority, should the matter not be resolved to the person's satisfaction.</p>	
6.	<p>The representative handling the matter will seek appropriate supporting information from various relevant staff members. The request for all additional information or clarification must be provided within 2 weeks from the date of request. This is necessary to comply with the stipulated times of response to the complainant within 30 days.</p>	
7.	<p>A written reply must be made in response to the complaint within 30 days from the acknowledgement of the complaint clearly outlining the actions taken to remedy the problem, the determination of the investigation into the complaint and the final results.</p>	
8.	<p>The Complaints Register must be updated to show the completion of the procedure.</p>	
9.	<p>A summary report of all complaints received and resolved must be presented on a quarterly basis to the Board of Directors and should also be reflected in the regulatory quarterly report.</p>	



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