



COMPLAINT HANDLING POLICY

Last Updated on: 03 September 2024

1. Objective

The objective of this Policy is to ensure that:

- All complaints are taken seriously and dealt with in a timely manner.
- All clients are treated fairly, politely and respectfully.
- The resolution process is systematic and straightforward.
- The resolution of the complaint is fair, open and transparent.
- No complaints are ignored or kept secret and the appropriate level of staff representation is involved, including the Managing Director or Board if required.

2. Procedure

a. Complaint to ZERO Markets (NZ) Limited

- BO staff to check daily for receipt of complaints at the Operation's email address.
- Complaint is brought to the attention of the Head of Department within 24 hours.
- Compliance to reply to complainant within 24 hours that complaint has been received and a resolution will be made as soon as possible.
- Head of Department investigates and recommends resolution. Investigation may include but is not limited to interviews with staff and client and analysing of conversations, transactions and system database.
- Managing Director approves the resolution.
- BO sends a recommended resolution to the client.
- BO record will be filled by BO staff only when the complaint requires investigation and negotiation to bring it to an acceptable conclusion.
- Client accepts resolution. A Complaint handling submission letter will be sent to client.
- Client does not accept resolution. Complaint will be passed on to the FDRS.
- Compliance staff will record the details on the Complaint Register once the Customer Complaint record form is signed by Operation, Director and Compliance.
- Complaint and status of resolution are reported to the Compliance & Risk Management Committee in monthly Compliance & Risk Report.

b. Complaint to Financial Dispute Resolution Services ("FDRS")

Compliance Manager is the only person authorised to liaise with the FDRS. The below procedure applies when a compliant is lodged with the FDRS.

Compliance Manager brings matter to attention of Head of Department and Managing Director

- Head of Department investigates and recommends resolution. Investigation may include but is not limited to interviews with staff and client and analysing of conversations, transactions and system database.
- Managing Director approves the resolution.
- Compliance Manager sends recommended resolution to FDSR and attends mediation if necessary.
- Client accepts resolution. End of process.
- Client does not accept resolution. Await further action from client.
- Compliant and status of resolution are reported to the Compliance & Risk Management Committee in monthly Compliance Report.

c. Complaints in an anonymous manner

Complaints in an anonymous manner are not to be ignored. The company values feedback.

- Compliant to be brought to the attention of the Head of Department within 24 hours.
- Compliance to reply to complainant within 24 hours that complaint has been received and a resolution will be made as soon as possible.
- Head of Department investigates and recommends resolution. Investigation may include but is not limited to interviews with staff and client and analysing of conversations, transactions and system database.
- Manager Director approves the resolution.
- Compliant and status of resolution are reported to the Compliance & Risk Management Committee in Monthly Compliance Report.

3. Trend Identification of Complaints

The Compliance Department shall be responsible for the identification of the trend of complaints. The analysis shall include at least the below items.

- Complaint about staff conduct
- Complaint about staff professionalism and knowledge
- Compliant about product
- Compliant about service level
- Complete about lack of or non-timely information
- Compliant about pricing and fees
- Complaint about system performance
- Is complaint from same person or persons?

4. Record Keeping

All complaints are filed in a Complaints Register. At the end of each month, Compliance Manager will include the following in the monthly Compliance Report to the Compliance & Risk Management Committee:

- Number of complaints.
- Summary of complaints and resolution.
- Number of complaints that have not reached resolution and status.
- Trend analysis of complaints

5. Safeguard

At any time after the receipt of the complaint, there is always more than one person who is aware of the complaint. This prevents the complaint from being hidden.

The resolution must be approved by the Managing Director and is brought to the attention of the Compliance & Risk Management Committee. This gives transparency to the process and ensures that no complaints are hidden. This also provides feedback on the performance of the Company's staff and systems in relation to client expectation.



Should you have any questions or enquiries, please don't hesitate to

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