



# Complaint Handling Procedure

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ver. 02.19

## 1. Introduction

Following the implementation of the Markets in Financial Instruments Directive 2014/65/EU (“MiFID II”) and in accordance to the provisions of the Financial Services and Activities and Regulated Markets Law of 2017 (the “Law”) and the Directive for the Authorization and Operating Conditions of CIFs (DI144-2007-01 of 2012) of the Cyprus Securities and Exchange Commission (“CySEC”), Initial Merit Secure Ltd formerly known as Nextrade Worldwide Ltd (hereinafter called the “Company”) is required to establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints received from retail clients or potential retail clients, and to keep a record of each complaint and the measures taken for the complaint’s resolution.

## 2. Queries

In case that a client is displeased with the Company’s services or if has any query with regards to his/her account or activity with the Company, he/she may contact the **Customer Support Department** via:

- a) Email: [support@imsmarkets.com](mailto:support@imsmarkets.com)
- b) Telephone: +357 25 754323
- c) live chat.

The Company’s Customer Support Department will determine if the client’s query can be resolved immediately or whether it will require further investigation. If the client’s query cannot be resolved immediately, the Company will remain committed in addressing and/or resolving it promptly.

If the Client is unsatisfied with the response to the query, then he/she may raise this further with the Complainant Handling Officer following the process indicated in the following section.

## 3. Official Complaint

A “complaint” is defined as an expression/statement of dissatisfaction addressed to the Company by a client (natural or legal person) relating to the provision of investment and/or ancillary services.

All complaints made by clients (or potential clients) either directly to the Company or indirectly through the Commission, in relation to the way in which the Company conducts its business must be fully investigated by the Compliance Officer and where possible appropriate action taken to resolve the situation.

Even a seemingly minor complaint, which is mishandled or left unchecked could lead to serious and damaging consequences for the Company. Any apparent complaint, whether written or oral, must be immediately referred to the Compliance Officer.

## 4. Procedure

When a client is proceeding with a complaint, it will be free of any charges.

A complaint must not include offensive language towards the Company, or towards an employee of the Company.

Complaints may be submitted in writing using Client Complaint Form ( Appendix 1), by post or by email only at the contact details provided below:

- a) Postal Address: 3, Pythagora Street, Pythagoras Court, 4th Floor, CY-3027 Limassol (Attention to: Compliance Officer)
- b) By email: [compliance@imsmarkets.com](mailto:compliance@imsmarkets.com)

Once a complaint is received, it will be registered in the Company's "Internal Registry" under a unique reference number. This reference number will be comprised of ten (10) digits made up by the Company's TRS code (2 digits), the year (4 digits) and the complaint number for the year (4 digits). This unique reference number will be communicated to the complainant, who shall be using it in any future contact with the Company, the CySEC and/or the Financial Ombudsman.

All complaints shall be dealt by the Compliance Officer in accordance with the procedures set below:

- a) All complaints must be acknowledged in writing within **five (5) business days** of being received. The written acknowledgment sent by the Company to the complainant will include the complaint's unique ten (10) digit reference number, as well as details of the name and capacity of the person dealing with the complaint.
- b) The Complaint Handling Officer will investigate the complaint and respond, within two (2) months, to the Complainant about the outcome/decision. Throughout the investigation process, the Company shall inform the complainant of the handling process of his/hers complaint(s) and if needed request for further information in order to facilitate the resolution of the complaint.
- c) In case the investigation is not concluded within two (2) months following the submission of the complaint, the complainant will be informed in writing of the reasons for the delay and when he should expect completion of the investigation process (this period will not exceed three (3) months from the submission of the complaint).
- d) Finally, the Company will inform the complainant that he/she may refer the complaint, if not satisfied with the Company's final response, to the Cyprus Securities and Exchange Commission (electronically: <http://www.cysec.gov.cy/en-GB/complaints/how-to-complain/>) for further investigation or the Financial Ombudsman of Cyprus.
- e) A complaint to the Financial Ombudsman should be filled within three months from the receipt of the response from the company.

The details of the Financial Ombudsman of the Republic of Cyprus are:

Address: 13 Lord Byron Avenue, 1096 Nicosia

Phone: +357 22848900

Facsimile (Fax): +357 22660584, +357 22660118

Complaints: [complaints@financialombudsman.gov.cy](mailto:complaints@financialombudsman.gov.cy)

Financial Ombudsman: [fin.ombudsman@financialombudsman.gov.cy](mailto:fin.ombudsman@financialombudsman.gov.cy)

Website: [www.financialombudsman.gov.cy](http://www.financialombudsman.gov.cy)

The details of the Cyprus Securities & Exchange Commission are:

Address: 27 Diagorou Street, 1097 Nicosia

Telephone: +357 22506600

Fax: +357 22506700

E-mail: info@cysec.gov.cy

Website: www.cysec.gov.cy

## 5. Complaints record and register

A full record of each complaint, including all relevant documents, and of the action taken in response must be kept by the Company for seven (7) years after the date of the last response.

The Compliance Officer is responsible for entering all complaints onto the Complaints Register and recording the outcome. The following information should be noted:

- the identity of the complainant (name and surname of the client)
- internal account number (given to the Client over account opening)
- the Company's employee to whom the complaint was made
- the Company's employee responsible for that client relationship and his department
- the date on which the complaint was received and filed
- a summary of the complaint
- the value of the complainant's portfolio
- the approximate value of any loss which the complainant claims to have suffered
- the date and a summary of the Company's reply to the complaint
- a note of any other relevant correspondence with the complainant, which should be kept in the appropriate client file

The Complaints Record and Register should be available for inspection by the Commission at any time.

## 6. Complaints Reporting

On a monthly basis, irrespective of whether a complaint has been received or not, the Company will submit to the Commission Form T144-002-001. If a complaint has been received, the said Form must include information about the complaints it has received and how these have been handled.

## 7. Complaints Monitoring

Pursuant to paragraph 13 of Directive DI 144-2007-01, the Company is required to analyze on an on-going basis, complaints-handling data, to ensure that it identifies and addresses any recurring or systemic problems. Specifically, the monitoring process should include, inter-alia:

Initial Merit Secure Ltd formerly known as Nextrade Worldwide Ltd

- Analysis of the cause of the individual complaints so as to identify the common root causes to various types of complaints;
- Consideration of whether the said root causes also affect other processes or financial means, including those not directly complained of; and
- Correction of the root causes.

Moreover, the Company's responsible person to oversee the complaints procedure is the appointed Compliance Officer.

Appendix 1  
**CLIENT COMPLAINT FORM**

You are kindly requested to fill the information below. Please note that the Complaint form is only indicative and not exhaustive, therefore the Company may request further clarification and evidence for the efficient investigation and resolution of your complaint.

<b>Client Information</b>	
Name and Surname	
ID / Passport Number	
Trading Account Number	
Country of Residence	
Nationality	
Phone Number	
Email Address	
Initial Merit Secure Representative Name	
Initial Merit Secure Representative Email Address	
When the incident you are complaining about occurred?	
<b>Complaint Details</b>	
Please provide a Summary of your complaint below. We kindly request to justify the disputed amount and to include any information that will facilitate the Company in the investigation of your complaint.	
Have you contacted the authorities with regards your complaint?	<input type="checkbox"/>
If you answered yes, which financial authority you have contacted?	
In order to facilitate the resolution of the complaint, we kindly ask you to provide any relevant evidence supporting your complaint such as screenshots or email communication supporting your complaint.	
Signature:	
Date:	