



COMPLAINTS HANDLING POLICY

August 2025

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1. Introduction

M4Markets is the brand name of Harindale Ltd (hereinafter the “Company”, or “we” or “us” or “our”), an Investment Firm incorporated and registered under the laws of the Republic of Cyprus, with registration number HE 346662. The Company is authorized and regulated by the Cyprus Securities and Exchange Commission (hereinafter the “CySEC”) under the license number 301/16.

This Complaint Handling Policy (hereinafter referred to as the “Policy”) sets out the processes employed when dealing with complaints received by Clients.

2. The Policy

The purpose of this Policy is to outline our effective and transparent procedure in place for immediate handling for all Client complaints to ensure the Company’s compliance with applicable Laws, Rules and/or Regulations and operate in line with the complaint management procedures stipulated by CySEC. For the purposes of this Policy, Complaint shall mean an expression of dissatisfaction by a Client regarding the provision of investment and/ or ancillary services provided to him/her by M4Markets.

3. How to Make a Complaint?

All Clients’ complaints shall be handled by our Compliance Department. However, the final settlement of non-trivial complaints shall be approved by Senior Management.

In order to file a complaint, a complainant shall complete the Complaint Form developed by the Company (see **Annex 1** attached hereto).

The following information should be provided to and recorded by the Compliance Department, whenever possible, so as to make sure that the complaint is expedited in the most efficient and fair way for the best interest of the Client:

- a. Full name of the Client;
- b. Account Number;
- c. Date when the issue and/or problem first took place;
- d. Short summary of the complaint;
- e. Disputed amount and currency; and
- f. Provide any other document or otherwise relevant to the complaint.

Once completed, it should be sent to our Compliance Department, in one of the following ways:

- in a hard copy along with a copy of the complainant’s identification document and any other additional documentation relevant to the complaint, to the Company’s

head offices, which are located at Magnum Business Center, 78 Spyrou Kyprianou Avenue Limassol, 3076, Cyprus; or

- by e-mail to complaints@m4markets.eu

Only a duly completed and submitted Complaint Form accompanied by adequate supporting evidence (as necessary) has been received, it will be recorded as a Complaint by the Company and will be handled as such.

Within five (5) days from the date of reception of a complain, the Company will send a written acknowledgement to the complainant, confirming safe receipt of the complaint and that all necessary steps will be taken in order to resolve the complaint. Additionally, the Company will give an estimated timeframe required to resolve the said complaint along with the unique reference number which will be assigned to the complaint. **The complainant should use this unique reference number in all future contact with the Company, the Financial Ombudsman and/or the CySEC, regarding the specific complaint.**

Following receipt confirmation, the Company will investigate the Client's complaint. In investigating a Client complaint, the Company takes into account the subject matter of the Complaint, the contents of the duly completed and signed Complaint Form, the evidence the Client has provided, and the evidence in our records. As part of our investigation, we may share and receive information (including personal, financial and trading data) regarding a Client complaint with/from third parties (e.g. with the CySEC, the Financial Ombudsman of Cyprus, our legal advisors or with another subsidiary company of our group of companies) in line with our Privacy Policy and the Client Agreement.

Within two (2) months, the Company will reply to the complainant about the outcome and/or decision. During the investigation of the complaint, the Company will keep informing the complainant of the handling process of his/her complaint.

Where the Company is unable to respond within the aforementioned to the Client two (2) months period, it will inform the complainant of the reasons for the delay and indicate a new timeframe that it needs to complete the investigation. In any case, this timeframe cannot and should not exceed three (3) months from the submission of the complaint.

When we reach our final decision, we will inform you without delay and we will provide you with an explanation of our position and propose remedial measures (if applicable). We will consider a Complaint as resolved or settled once we have sent you in writing our final decision and/or further clarifications on the final decision.

Furthermore, should a Client fail to reply to any communication from the Company (including the Final Response) for a period of greater than one (1) month, the Company will consider the Complaint time-barred and closed.

4. Financial Ombudsman

In the event a Client is not satisfied with our assessment and decision, he/she can refer his/her complaint to the Financial Ombudsman, given that:

- The claimed amount in the complaint does not exceed the amount of EUR170.000;
- The Client first files a formal complaint to the Company within fifteen (15) months from the date that he/she was aware or ought to be aware that the reason of your complaint has occurred;
- The Client received the Company's final response and/or decision within three (3) months from the date that the Company acknowledged receipt of the Client's complaint and is not to the Client's satisfaction or from the closing date by which the Client should receive the Company's final response in the case he/she does not receive it;
- The Client submits his/her complaint to the Financial Ombudsman within four (4) months from the date he/she received the Company's final response or from the closing date the Company ought to provide it to the Client in the case he/she does not receive the Company's final response;
- No judgment has been issued from a Court for the same complaint or not judicial procedure is pending for the assessment of the same complaint.

4.1 Financial Ombudsman contact details:

Address: 13 Lord Byron Avenue, 1096 Nicosia, Cyprus

Phone: +357 22 84 89 00

Fax: +357 22 66 05 84, +357 22 66 01 18

Emails: complaints@financialombudsman.gov.cy
fin.ombudsman@financialombudsman.gov.cy

Website: www.financialombudsman.gov.cy

You may maintain your complaint with the Cyprus Securities and Exchange Commission, however, please note that the Cyprus Securities and Exchange Commission does not have restitution powers and therefore does not investigate individual complaints.

5. Submission of Complaints to an Alternative Dispute Resolution entity

Further to the above, it might also be possible to refer a complaint to an Alternative Dispute Resolution entity in Cyprus. The Client should seek further details on this approach on their own.

6. Civil Action

It is understood that the Client's right to take legal action remains unaffected by the existence or use of any complaints procedures referred to above.

Hence, in the event a Client is still not satisfied with the decision issued by the Financial Ombudsman in regard to his/her complaint, he/she may take further legal steps by filing a civil action in the competent Court in the Republic of Cyprus.

7. Reporting of Complaints

Under CySEC's laws and rules, the Company, each month, provides to CySEC, details regarding the complaints it receives and how these are being handled, in a standardized report format.

7.1 Record-Keeping of Complaints Received

The department responsible for the record keeping of complaints received is the Compliance Department. Pursuant to CySEC's laws and rules, the Company is required to keep an internal register of complaints where all relevant data and progress of each complaint are kept.

All relevant information and progress of the Clients' complaints are reported to the Senior Management, on an annual basis, as well as any remedies undertaken or to be undertaken in regard to any deficiencies and/or weaknesses that the Company may have.

All information collected is handled and kept in line with our Privacy Policy and the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation) and to the Cypriot law that enacted the said Regulation to Cyprus 125(I)/2018.

The Company shall maintain all complaints or grievances for a minimum period of five (5) years.

8. Disclaimer

All of the above do not apply in a case when the Client owes money to the Company.

In a case such as the above, the Company reserves its legal rights to initiate legal proceedings against the Client, in order to recover any debts owed.

Also, nothing set forth herein shall prevent either party from applying to the competent Court for any of the interim or injunctive reliefs.

Each party acknowledges that a breach of the provisions set out herewith may cause the other party irreparable injury and damage and, therefore, any such breach may be enjoyed through injunctive proceedings, in addition to, any other rights and remedies that may be available to either party as per applicable laws or in equity.

Annex 1

Client Complaint Form

Client Information:

Full Name/Legal Entity name (in case the Client is a legal person):	Account Number:
ID/Passport No/Registration No.:	Address:
E-mail:	Telephone:

Brief Summary of the Complaint:

Date of Incident:	Disputed Amount:
Description of the incident	
Name of Employee (if applicable):	Department (if applicable):

Signature:	Date and Place:
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