

# Complaints Handling Policy

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## **1. Introduction**

- 1.1. ALTUM Ltd, a company duly incorporated and existing under the laws of the Republic of Seychelles, with company registration number 8434835-1, having its registered address at House of Francis, Room 302, Ile Du Port, Mahe, Seychelles, and licensed and regulated by the Seychelles Financial Services Authority (FSA) under Securities Dealer's Licence No. SD194, trading under the brand name Altum Brokers (hereinafter referred to as the "Company", "we", "us", or "our").
- 1.2. This Complaints Handling Policy ("Policy") sets out the principles and procedures for the prompt, fair, and consistent handling of client complaints. The Company is committed to maintaining the highest standards of integrity, transparency, and professionalism in its dealings with clients.
- 1.3. The Policy ensures that all complaints are handled efficiently, transparently, and in accordance with the relevant laws and regulations.

## **2. Definition of a Complaint**

- 2.1. A "Complaint" means an expression of dissatisfaction by a client, whether oral or written, concerning the provision of any investment or ancillary service offered by the Company, where a response or resolution is expected.
- 2.2. A complaint must include:
  - a) Client's full name and surname;
  - b) Trading account number;
  - c) Date and description of the issue;
  - d) Transaction reference(s) (if applicable); and
  - e) Supporting documentation relevant to the complaint.

- 2.3. Complaints containing offensive or abusive language will not be accepted or investigated.

### **3. Submitting a Complaint**

- 3.1. Clients may submit complaints to the Company in writing via email to any of the following departments, depending on the nature of the issue:
  - a) General / Non-Trading Issues: [support@altumbrokers.com](mailto:support@altumbrokers.com)
  - b) Trading-Related Issues: [trading@altumbrokers.com](mailto:trading@altumbrokers.com)
  - c) Escalations / Independent Review: [clientaudit@altumbrokers.com](mailto:clientaudit@altumbrokers.com)
- 3.2. The complaint should clearly describe the issue and provide any relevant supporting evidence (e.g. trade IDs, platform screenshots, correspondence).
- 3.3. If a client's representative submits a complaint on their behalf, the Company may request proof of authorisation before proceeding with the investigation.

### **4. Acknowledgement and Investigation**

- 4.1. The Company will acknowledge receipt of a complaint within two (2) business days, assigning a unique reference number for tracking purposes.
- 4.2. Upon receipt, the complaint will be recorded in the Company's Complaints Register and reviewed by the relevant department.
- 4.3. If additional information is required, the Company will contact the complainant to obtain clarification or supporting documents.
- 4.4. All complaints will be handled impartially, and the employee directly involved in the subject of the complaint will not take part in the review process.

## **5. Resolution and Response Timeframes**

- 5.1. The Company aims to resolve all complaints as soon as possible, typically within ten (10) business days of acknowledgment.
- 5.2. If the complaint requires further investigation and cannot be resolved within ten (10) business days, the Company will send a holding response outlining:
  - The reason for the delay; and
  - The expected timeframe for the final response.
- 5.3. In all cases, the Company will provide a final response within thirty (30) business days from the date of receipt. If additional time is required due to complexity, the complainant will be notified accordingly, and the resolution will not exceed ninety (90) business days.
- 5.4. The final response will include:
  - The Company's findings and decision;
  - Any corrective or compensatory measures (if applicable); and
  - Information on further escalation options available to the client.

## **6. Escalation Procedure**

- 6.1. If the complainant is not satisfied with the initial response, the complaint may be escalated to the Client Audit Department at [clientaudit@altumbrokers.com](mailto:clientaudit@altumbrokers.com) for an independent review.
- 6.2. If the complaint remains unresolved after internal escalation, the client may submit the case to the Financial Services Authority (FSA) Seychelles:

Financial Services Authority (FSA)

Bois De Rose Avenue, P.O. Box 991, Victoria, Mahé, Seychelles

Email: [complaints@fsaseychelles.sc](mailto:complaints@fsaseychelles.sc)

Website: <https://fsaseychelles.sc/complaint-handling>

## **7. Record Keeping**

- 7.1. The Company shall maintain a Complaints Register that records:
- Date of the complaint;
  - Client identification and account details;
  - Description of the complaint;
  - Responsible department and handling officer;
  - Resolution status and dates; and
  - Any corrective actions taken.
- 7.2. All complaint-related records (including emails, call recordings, and correspondence) shall be kept for a minimum of seven (7) years from the date of resolution.

## **8. Confidentiality and Fair Treatment**

- 8.1. All complaints and related information will be treated with strict confidentiality.
- 8.2. The Company shall ensure that all clients are treated fairly, and that no discrimination or bias affects the handling or outcome of a complaint.
- 8.3. Complaints data shall be periodically reviewed to identify potential areas for process improvement and enhanced client experience.

## **9. Review and Updates**

- 9.1. This Policy will be reviewed annually or as required by changes in legislation or Company operations.
- 9.2. The current version and any updates shall be made available on the Company's official website.