



MONEY IS ONLY A TOOL. IT WILL TAKE YOU WHEREVER YOU WISH, BUT IT WILL NOT REPLACE YOU AS THE DRIVER

Complaint Handling Policy

Moventum S.C.A

May 2023

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1. Introduction

- 1.1. Moventum S.C.A (“we”, “us”, or “our”) is a private limited liability company incorporated under the Luxembourg registration number P00000163 and regulated by the European Securities and Markets Authority (hereinafter the “ESMA”), under license date 08/01/2001, with its registered office at 12, rue Eugène Ruppert L-2453 Luxembourg. For the purposes of these Terms references to “you”, “your”, or “client” refer to you, unless otherwise stated.
- 1.2. For client protection and satisfaction, you should take time to carefully read this Agreement as well as any other policies, additional documents, and information available to you through our website prior to opening an account with us. By default, you must read, agree, and accept all the General terms and conditions set out below, and any additional documents incorporated herein by reference before you establish a business relationship with us (without modifications)
- 1.3. If you have objections to any of these general terms and conditions, or any part thereof, and/or if you do not agree to be bound by these general terms and conditions, or any part thereof, do not access and/or use our online trading facility in any way and inform us in writing immediately.
- 1.4. By accepting this Agreement, you agree to be bound by these terms and conditions and our Terms of Business (including any schedules, annexes, exhibits, amendments and/or side agreements, if any) that apply to your account and are always subject to any applicable laws. In the event of any conflicts or inconsistency between our Terms of Business and this agreement, our Terms of Business shall prevail.

2. Definitions

- 2.1. “**Complainant**” means any person, natural or legal, who is eligible to lodge a complaint to the Company and / or who has already lodged a Complaint.
- 2.2. “**Complaint**” means a statement of dissatisfaction addressed to the Company by a complainant relating to the provision of investment services. A non-exhaustive list of issues that may be considered as complaints can be found below:
 - 2.2.1. Execution of orders related issues.
 - 2.2.2. Investment advice.
 - 2.2.3. Unauthorized business.
 - 2.2.4. Withdrawals/deposits related issues.
- 2.3. “**Inquiry**” means any general question submitted to the Company via the website inquiry form, email or chat regarding the provision of investment services and which does not constitute a complaint.

3. Inquiries submission

- 3.1. If you have an inquiry or questions in relation to your experience or activity with us, you may file an inquiry form via our inquiry page which is accessible through our website.
- 3.2. Once we receive your inquiry, an acknowledgment of receipt will be sent to you. We are committed to investigate and address any matters within 5 business days.

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- 3.3. If the Company is unable to resolve your inquiry or fails to respond within the set timeframe, you may proceed in filing a complaint by completing our complaint form with all the required information found in section 4 below.
- 3.4. For a detailed description of the inquiry submission procedure, you may visit the Company's Inquiry & Complaints Handling Procedure.

4. Complaints submission

- 4.1. Complaints may be submitted by using the Company's complaint form which can be provided from our support department upon your request. Once the complaint form is completed you can submit it in one of the following ways:
 - 4.1.1. By email to compliance@moventumsca.com
 - 4.1.2. 12, rue Eugène Ruppert L-2453 Luxembourg
- 4.2. The Company shall acknowledge via email the receipt of the complaint to the complainant within maximum five (5) business days and shall provide the complainant with the unique reference number and the Company's Complaint Handling Procedure.

5. Steps following the submission of complaints to the Company.

- 5.1. If you are not satisfied with the Company's final decision you may refer your complaint to the competent authorities by quoting your complaint's unique reference number, provided that no court decisions have been issued for the same complaint and/or no judicial procedure is pending for the examination of the same complaint as required under applicable laws and regulations.
- 5.2. The Financial Ombudsman website can be accessed via: <https://www.financial-ombudsman.org.uk/>.
- 5.3. The European Securities and Markets Authority ESMA website can be accessed via: www.esma.europa.eu/

The complainant reserves the right to take any legal action and/or to refer his/ her complaint against the Company to the ADR Firm in case that the complaint is unresolved and/or if the client remains dissatisfied with the decision outcome.

6. Complaints Handling

- 6.1. Once your complaint is acknowledged, we will carefully investigate it and will try to properly resolve it within a reasonable time.
- 6.2. If deemed necessary, the complaint shall be escalated to the Compliance Department for further investigation.
- 6.3. In the case that the Complaint is submitted in a language other than English, a true translation must be obtained.
- 6.4. At all times, the complainant shall be informed by the Company regarding the handling process of his/her complaint.

- 6.5. We shall use our best endeavors to provide you with the outcome of our investigation within two (2) months from the day of the submission of your complaint.
- 6.6. If your complaint requires further investigation, we will inform you of the reasons for the delay and indicate when it is likely for the investigation to be completed. In any event, this period cannot exceed three (3) months from the initial submission of the complaint.
- 6.7. Upon investigation completion, the Compliance Department shall inform the complainant in writing, using plain language, which is clearly understood, about the results of the investigation and actions taken to satisfy the complainant's demand(s).

7. Procedures following the receipt of a complaint.

- 7.1. Upon receipt of a complaint, the Compliance Department shall register the complaint to an internal register, giving it a unique reference number.
- 7.2. The registration of each complaint received shall be performed no later than one (1) business day following the date of receipt, and the access to the Complaints Register should be restricted to authorized employees only.
- 7.3. Upon receiving a written complaint, the Company should obtain and record amongst others, the following details:
 - 7.3.1. Personal information of the client
 - 7.3.2. Client's account number
 - 7.3.3. The complaint's category and description
 - 7.3.4. The service provided by the Company and related to the complaint.
 - 7.3.5. Disputable amount where applicable
 - 7.3.6. Date of receipt and registration of complaint
 - 7.3.7. Settlement date
 - 7.3.8. Evidence and/or supporting documents related to the complaint.
- 7.4. The facts as stated by the client are examined and verified, to establish if any additional information is needed to be retrieved from the Company's archive (electronic mail, recorded telephone calls, IT data, etc.).
- 7.5. In the case where a complaint is valid, the management shall take such necessary action together with the Head of Department(s) to which the complaint is related, to identify and verify: (1) Reasons for failure to follow procedure; (2) Weaknesses of the internal controls; and (3) Implementation of internal controls to prevent any complaints in the future.
- 7.6. The Company has the right to refrain from reviewing a complaint where:
 - 7.6.1. It is classified as an inquiry. The complainant maintains the right to request for the re-classification of his/her inquiry as a complaint.
 - 7.6.2. It is unable to identify the complainant's identity.
 - 7.6.3. It includes offensive language directed either to the Company or an employee of the Company.

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7.6.4. It is received through telephones unless the complainant subsequently submits the complaint form as evident.

7.7. The Company is required by law to provide the European Securities and Markets Authority ESMA information regarding the received complaints and complaints-handling monthly.

8. Internal analysis of complaints on an ongoing basis

8.1. The Company undertakes to analyze, on an ongoing basis, complaints-handling data, to ensure that they identify and address any recurring or systemic problems, and potential legal and operational risks. Such analysis shall include the causes of complaints to identify root causes common to those types of complaints and correction of such roots were deemed necessary.

8.2. Depending on the seriousness of the complaints, they may be classified as serious complaints or regular complaints. In all cases, complaints regardless of their impact, are dealt with the maximum attention and urgency.

8.3. Complaints may be resolved by means of an explanation or an apology, or even financial compensation.

9. Record Keeping

9.1. We maintain records of all complaints as well as all related details for a minimum period of five (5) years and were requested by ESMA, for a period of up to seven (7) years.

9.2. Records shall be stored in a medium so that they are readily accessible and available to clients on request, and such records shall be presented in the same language(s) as that used to provide investment services to clients.

10. Policy Review

10.1. The Company must analyze on an on-going basis the complaints-handling related data in order to identify common issues arising from various types of complaints and initiate appropriate actions to make the Complaints redressal mechanisms more efficient and effective.

10.2. The Company's policy is assessed and periodically reviewed, at least on an annual basis, or more frequently, should the need arise and any amendments to this policy shall be approved by the Company's Board of Directors. The client shall be notified in writing of the nature of the changes deemed appropriate by law, and the revised policy will be available on the Company's Website.

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