



COMPLAINTS HANDLING POLICY

2024

1. INTRODUCTION

Mirabaud Group LTD (herein “the Company” or “we”) maintains effective and transparent procedures for the reasonable and prompt handling of concerns and/or queries and/or issues and/or complaints received from retail or professional clients and keeps a record of each complaint or concern and the measures taken for its resolution.

The Company’s aim is to always provide a high level of service to all of its clients and ensure that the Company handles complaints fairly, efficiently and effectively. The Company appreciates that from time-to-time things can go wrong or there can be misunderstandings, however the Company is committed to deal with concerns and complaints positively and supportively in line with complaints handling procedures and legislative requirements. The purpose of this of the Complaints Handling Policy (the “Policy”) is to set out the procedures to be followed and the appropriate actions to be taken by Mirabaud Group LTD (hereafter the “Company”) in the cases where a complaint or grievance is received from any of the Company’s Clients.

The complaints management procedures for the handling of complaints received by the Company, as described in this Policy, are established in compliance with the Vanuatu Financial Services Commission (VFSC) section 7A of the Financial Dealers (Licensing) Act [CAP 70] and VFSC Guidance Notes Addressing Complaints Against a Financial Dealers Licensee, with the aim to establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling and resolution of complaints or grievances received by the Company in respect of its licenced activities.

The aim of the procedures established in the current Policy is to deliver a consistent, high-quality and accountable response to each official complaint, regardless of the subject matter.

2. DEFINITIONS

Complaints Officer: The Company has appointed a Compliance Officer to efficiently ensure the proper handling of any complaints from the Clients. This is to allow the Company to resolve and apply mandatory measures to avoid any recurring issues.

Complainant: any person, natural or legal, which is eligible for lodging a complaint to the Company and who has already lodged a complaint.

Complaint: a statement of dissatisfaction addressed to the Company by a complainant relating to the provision of investment services..

3. PROCEDURE

The Complaints Officer shall be responsible to ensure the proper handling of Client complaints, except whereby the complaint shall be handled by the Customer Support Team.

1. The Client may register a Complaint by completing the Complaint Form, using any of the following options: a) Email: support@freedom27.com or b) Website Complaint form <https://freedom27.com/contact-us#/>
2. When lodging a complaint, the Client shall include the following information:
 - a. trading account number.
 - b. name and surname
 - c. A description of the problem and affected transaction number (if applicable)
 - d. The date and time the Client encounter the issues being the subject matter of the complaint
 - e. primary contact information regarding this complaint
3. Upon receiving the complaint, the Company will immediately register the Complaint in the internal register of the Company giving it a unique reference number

4. A written acknowledgement together with the unique reference number of the Client's complaint will be sent to the Client within 5 (five) business days. A unique reference number of the Client's complaint shall be used for all future contact with the Company.

5. The Company shall make every effort to investigate Client's complaint and provide the Client with the outcome of our investigation within two (2) months from the date the Client has submitted his complaint to the Company. During the investigation process will keep the Client updated of the handling process of your complaint. The Company shall have (3) attempts to resolve the complaint matter with the Client.

The final written response to the Client shall be sent via an email which either:

- (a) Accepts the complaint and, where appropriate, offers redress or remedial action; or
- (b) Offers redress or remedial action without accepting the complaint; or
- (c) Rejects the complaint and gives our reasons for doing so; or
- (d) Explains why it is not possible to make a final response and indicates when we expect to be able to do so.

If the Client accept our decision he should inform us of this, but if the Client does not do so within eight weeks, the case

4. Right to Refer to Vanuatu Financial Services Commission

Where we are not able to resolve your complaint to your satisfaction, you may be permitted to refer your complaint to the VFSC. Should this be necessary, Mirabaud Group LTD will provide you with full details of how to do this

5. RECORD KEEPING OF COMPLAINTS

The Company shall maintain all complaints for a minimum period of seven years after the execution of the complaint and/or termination of the business relationship with the Client. The responsible department shall be the Compliance Department.

6. COMPLAINTS FORM

Please note that the below Complaint Form is only indicative and not exhaustive. The Company may request further information and/or clarifications and/or evidence as regards your complaint.

CLIENT INFORMATION	
Complaint Date (DD/MM/YYYY):	
Client name:	
Client account no:	
E-mail Address:	
Phone Number:	
DESCRIPTION OF THE COMPLAINT	

Does your complaint involve a financial loss?	Yes <input type="checkbox"/> kindly provide the estimated amount of loss:	No <input type="checkbox"/>
How you feel this complaint could be settled:		
For internal use		
Date received:		

Please accompany this form with a screenshot of your Trading Terminal if you feel it would further support your claim request.