



# Complaint Handling Policy

Date updated: December 2024

## 1. Important Information and Disclaimer

- 1.1. Titan FX (as defined below) is required to establish, implement and maintain an effective and transparent complaint handling policy and procedure for the prompt handling of Customers' complaints.
- 1.2. Titan FX offers its services through the following entities:
  - a. **Titan FX Limited** which is registered and **regulated by the Vanuatu Financial Services Commission** of the Republic of Vanuatu under registration number 40313 and registered office at 1st Floor Govant Building, 1276 Kumul Highway, Port Vila, Republic of Vanuatu;
  - b. **Titan Markets** which is registered and **regulated by the Financial Services Commission of Mauritius** with license number GB20026097 and registered office at The Cyberati Lounge, % Credentia International Management Ltd, Ground Floor, The Catalyst, Silicon Avenue, 40 Cybercity, 72201 Ebene, Republic of Mauritius;
  - c. **Goliath Trading Limited** which is registered and regulated by the **Financial Services Authority of Seychelles** under license number SD138 and registered office at IMAD Complex, Office 12, 3rd Floor, Ile Du Port, Mahe, Seychelles; and
  - d. **Atlantic Markets Limited** which is registered and regulated by the **British Virgin Island Financial Services Commission** under license number SIBA/L/23/1124 and registered office at Trinity Chambers, PO Box 4301, Road Town, Tortola, British Virgin Islands. (hereafter referred to as Titan FX, Company, we, us, our).
- 1.3. In this respect, the Company has established this Complaints Handling Policy (the "Policy") that sets out the process for the fair and prompt handling of enquiries and complaints received from the Company's Customers. This Policy includes a robust framework consisting of monitoring processes to ensure the prompt handling of Customers' complaints.

- 1.4. This Policy describes, amongst others, the process that Customers will need to follow in order to submit an enquiry and/or complaint to the Company.
- 1.5. The Company maintains Records of Complaints and measures taken for expedient complaint resolution, in line with applicable legislation, rules and/or regulations.
- 1.6. This Policy should be reviewed on a yearly basis or as the need arises, in order to ensure that the processes outlined in this Policy remain efficient and effective. Any necessary updates or changes to these procedures will be reflected in this Policy, which will be available on our [website](#).

## 2. Complaint Handling Process

2.1. The Company's Complaint Handling Policy is accessible to all our customers free of charge.

2.2. The Company is mandated to carry out a root cause analysis on complaints received, so that larger issues may be identified and actions are taken to rectify and address the said issues.

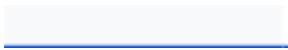
2.3. The Company ensures that the complaint handling process remains transparent, and that employees who handle the complaints must declare any conflict of interest that arises pertaining to complaints received. If a conflict arises, another employee should be appointed to handle the case where possible. If the conflicted employee is the only available resource to handle the complaint, or has to eventually approve decisions made in relation to the complaint, the employee may still handle the matter as long as the conflict of interest is properly declared.

2.4. Confidentiality is a key aspect of the complaint handling process. The Company ensures that all complaints received from customers or their representatives are treated with confidentiality at all times.

### 3. Applicable Procedure For Submission of Enquiries and Complaints

#### 3.1. Submitting an Enquiry

3.1.1. If the Customer has any enquiries regarding his account (hereinafter, the “Enquirer”), or requires clarification on the Company’s services, in the first instance, the Enquirer should contact the Company’s Customer Support Department (the “CS Department”) via:

- e-mail at, [support@titanfx.com](mailto:support@titanfx.com) 
- live chat,
- contacting an Titan FX representative on +678 27504, or any other official method of communication made available by the Company on its website, as the vast majority of enquiries and issues can be dealt with at this level.

3.1.2. The Company’s CS Department must promptly acknowledge receipt and will try to resolve the Customer’s enquiry immediately. If the Customer’s enquiry cannot be resolved immediately, the Company remains committed to addressing and resolving it in a prompt manner (usually within three (3) business days). If additional time is required, the Company will issue a holding response in writing via the registered email of the Enquirer, acknowledging receipt of the enquiry and will notify the Customer of the timeline for further contact regarding the follow-up process and resolution.

3.1.3. If the Enquirer requires further clarification or assistance beyond the final response provided by the CS Department, and explicitly indicates dissatisfaction with the Company’s resolution to a specific issue or query, they may refer to Section 3.2, ‘Submitting a Complaint,’ to explore other channels for feedback. Note that enquiries, as defined, are not expressions of dissatisfaction but may lead to a

complaint submission if the Enquirer feels the issue requires additional attention.

### **3.2. Submitting a Complaint**

3.2.1. Any Customer who wishes to express dissatisfaction or raise a concern regarding the Company's services or products may submit a complaint directly, without the need to submit an enquiry first (hereinafter referred to as "the Complainant"). If, however, a Customer has initially submitted an enquiry and is not satisfied with the final response received from the CS Department, they may choose to escalate the matter by submitting a formal complaint as outlined in this section.

3.2.2. The Company may accept complaints brought by third parties acting on behalf of a Complainant (Authorised Representatives), as long as the Complainant authorised in writing the third party and provides this authorisation as evidence to the Company via his/her registered email. When the Complaint is submitted by an Authorised Representative, the Company will investigate the legal basis of the submission. If no authorization is available, the Company will contact the Complainant directly, in order to accelerate the procedure.

3.2.3. When a complaint is submitted by an Authorised Representative, the Company will require the following information:

- Identification of both the Authorised Representative and the Complainant It is in the Company's discretion to request due diligence documentation and/or information on both the Authorised Representative and the Complainant, as per the internal AML policies and procedures of the Company.
- The relationship between the Authorised Representative and the Complainant
- The reason the Complainant cannot lodge the complaint themselves.

- An authorization letter and/or official document signed by the Complainant that authorizes the Authorised Representative to file a complaint on behalf of the latter.

3.2.4. The Complainant must fill out the [Complaint Form](#), as indicated in **“Appendix 2”** of this Policy. The Complaint Form should include truthful, complete and accurate information. The Complainant can also include supporting documentation to accompany his/her Complaint.

### 3.3. Additional Information on Enquiries and Complaints

3.3.1. The Company may require, in writing, at any given time during the examination and handling of enquiries and complaints from the Complainant to provide additional information, clarifications and/or documentation. The Complainant’s full cooperation is essential in order for the Company’s investigation to be concluded effectively.

3.3.2. The Company may decide to extend the investigation timeframe if the Complainant takes an extended period to respond or fails to provide a response within a reasonable or designated timeframe. However, if the Complainant does not cooperate or respond despite reasonable attempts, the Company may consider the matter closed, with all efforts to obtain feedback from the Complainant documented.

3.3.3. If the Complainant encounters difficulties submitting the Complaint Form through the official procedure outlined in this Policy, they may inform the Company using an alternative method, such as email [info@titanfx.com](mailto:info@titanfx.com) or telephone as depicted in the relevant section of the [website](#). The Company will then assist the client in addressing their complaint.

3.3.4. Once the Complaint Form is completed and signed, the Complainant shall submit it electronically to the dedicated email address

for complaints at [askcompliance@titanfx.atlassian.net](mailto:askcompliance@titanfx.atlassian.net), which is also available on the Company's [website](#).

3.3.5. Upon receipt of the complaint, it will be assigned to the relevant department or individual within the Company responsible for handling complaints, typically within the Customer Support and the Compliance Department.

### 3.4. Acknowledging your Complaint

3.4.1. Upon the successful submission of the Complaint, the Company will acknowledge receipt of complaints electronically **within forty-eight hours (48)** from the receipt of the complaint and provide a unique reference number to the complainant.

3.4.2. As part of the acknowledgement, complainants will be advised on the timeframe for receiving a response. The acknowledgement of complaints shall be in writing or on another durable medium with the ability to be stored, including digital means.

3.4.3. The unique reference number should be used in all future contact with the Company. The unique reference number allows complainants to follow up on the status of their complaint at any point.

### 3.5. Resolving the Complaint

3.5.1. Following acknowledgment of receipt, the Company will carry out an impartial review of the matter and communicate in writing to the Complainant the outcome of the Company's investigation and propose remedial actions (if applicable).

3.5.2. The timeframe in which the Company aims to resolve the complaint from the date the complaint is received is thirty (30) business days for complaints related to the international market.

3.5.3. In the unlikely event that the Company is unable to resolve the complain within the thirty (30) days, the Company will inform the Complainant in

writing of the reasons for the delay and indicate the period of time within which it is possible to complete the investigation. In any event, the Company shall provide the Complainant with the outcome of the Company's investigation no later than fortyfive (45) business days from the date of the Company's acknowledgment, depending on the complexity of the case and the Complainant's cooperation.

### **3.6. Responsibility for handling complaints**

#### **CS Department**

3.6.1. Employees of the CS Department are responsible for receiving and managing all the complaints within the Company. They are also available to assist Complainants in compiling and submitting their complaints, especially if the Complainant encounters difficulties in the process. Complaints should be submitted in relation to the services provided under the Terms and Conditions. Additionally, the Head of the CS Department is tasked with documenting all complaints and enquiries received by the Company.

3.6.2. If possible, all Complaints must be acknowledged and settled without delay. Company employees must forward all complaints submitted in writing to the CS Department who shall be responsible for settling Complaints. The officers of the CS Department will inform the Complainant of the appropriate process to follow. The Company aims to respond to the matter within the appropriate timeframe depending on the nature of the complaint and ensure that the maximum time to respond to complaints do not exceed the timeframes as per section 3.4.2 and 3.4.3 of this Policy.

### **Compliance Officer (CO)**

3.6.3. If the Complaint cannot be resolved by the CS Department, it will be forwarded to the CO. The CO will oversee the resolution process for more serious complaints. The CO and the Board of Directors will be notified of every complaint, regardless of its nature or severity.

### **Directors of the Company**

3.6.4. Within the Company, Directors of the Company represent the highest level of authority in deciding the settlement of Complaints. Complaints deemed most serious will be escalated to the Directors who shall settle those complaints that are considered most serious and cannot be managed by the CO. The Directors shall take into account the opinion of the CO of the Company in all such cases. The CS Department must provide every reasonable help during the handling/examination of the Complaint by the CO and/or the Directors aiming to settle the complaint as soon as possible, and in the best interest of the Complaint and the Company.

## **3.7. Communicating the resolution to the Complainant**

3.7.1. The Company shall notify the Complainant upon the closure of an enquiry or complaint.

3.7.2. As per the timeframes depicted, the Company will send written communication to the complainant, summarizing the issue raised, the findings and conclusion of the investigation and any proposed remedies along with the timeframe for the Complainant to respond.

3.7.3. The Company is entitled to treat an enquiry or complaint as closed in the following circumstances, among others:

- a. where it is determined that no further action is required by the Customer and/or the

- Company, upon the issuance of the final decision by the Company, and/or
- b. where the matter has been mutually resolved, and/or
  - c. where the Customer has failed to respond promptly and adequately to the questions and requests of the Company, and/or
  - d. where the Company has given a substantive response and the Customer has failed to indicate that the response is unsatisfactory and/or substantiate the claim with relevant data, within a reasonable timeframe.

## **4. Monitoring of Complaints and Record Keeping**

- 4.1. The Company maintains a Complaint Registry to record all complaints until they are resolved.
- 4.2. The Company manages Complaints within a transparent system that can be traced and administered in each and every stage of the procedure.
- 4.3. The Company shall only collect the necessary information needed and avoid the unnecessary collection of data in regards to the complainant with the exception of recording data aimed to settle the complaint.
- 4.4. After resolving the complaint, the Company shall preserve all written and electronic documents and/or communication related to the complaint for a period of seven (7) years always in accordance with relevant record-keeping legal requirements. Additionally, all personal information and/or particulars collected in the course of managing the complaint will be retained and protected, ensuring it remains identifiable for the same seven-year duration.

## 5. Settlement of Complaints

- 5.1. If further to the investigation conducted by the Company, the Complaint of the Customer is rejected by the Company and/or is not resolved, the Complainant may lodge an appeal to the relevant regulator (**Appendix 1**) for further review and investigation. It is important for the Complainant to first attempt to resolve the issue directly with the Company before being able to escalate it to the respective Regulator.
- 5.2. Alternatively, when a Complaint by a Complainant cannot be settled by the Company's Policy available at <https://titanfx.com>, the complainant can reach out to the regulatory authority (depending on the entity he is trading with) as per the below contact details.

**Appendix 1: Regulators Contact Details**

<b>Jurisdiction</b>	<b>REGULATOR</b>	<b>REGISTERED ADDRESS</b>
Vanuatu	Vanuatu Financial Services Commission Website: <a href="mailto:info@vfsc.vu">info@vfsc.vu</a> <a href="#">VFSC Guidance Note Addressing Complaints Against a Financial Dealer Licensee</a>	First Floor, Govant Building, Kumul Highway, Port Vila Vanuatu
Seychelles	Seychelles Financial Services Authority Email: <a href="mailto:complaints@fsaseychelles.sc">complaints@fsaseychelles.sc</a> <a href="https://fsaseychelles.sc/complaint-handling">https://fsaseychelles.sc/complaint-handling</a>	PO Box 991, Bois De Rose Avenue, Victoria, Mahe, Seychelles
Mauritius	Mauritius Financial Services Commission Website: <a href="mailto:ombudspersonfs@ofsmauritius.org">ombudspersonfs@ofsmauritius.org</a> <a href="#">Financial Services Commission Complaint Handling</a> <a href="#">Complaints Form Online</a>	The Cyberati Lounge, C/. Credentia International Management Ltd, Ground Floor, The Catalyst, Silicon Avenue, 40 Cybercity, 722201 Ebene, Republic of Mauritius

British Virgin Islands	British Virgin Islands Financial Services Commission Email: <a href="mailto:Commissioner@bvifsc.vg">Commissioner@bvifsc.vg</a> <a href="#">Complaints to the FSC</a>	Trinity Chambers, PO Box 4301, Road Town, Tortola, British Virgin Island
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## Appendix 2: TITAN FX COMPLAINT FORM

### A. DETAILS OF THE COMPLAINANT

- a. FULL NAME
- b. ACCOUNT NUMBER
- c. CONTACT DETAILS
- d. TELEPHONE NUMBER

e. EMAIL ADDRESS

f. HOME/BUSINESS ADDRESS

**B. DETAILS OF THE REPRESENTATIVE LODGING THE COMPLAINT ON BEHALF OF THE COMPLAINANT (IF APPLICABLE) a.**

**FULL NAME**

b. ACCOUNT NUMBER

c. CONTACT DETAILS

d. TELEPHONE NUMBER

e. EMAIL ADDRESS

f. HOME/BUSINESS ADDRESS

g. RELATIONSHIP TO THE COMPLAINANT

**h. REASON FOR LODGING THE COMPLAINT ON BEHALF OF THE COMPLAINANT**

**C. BRIEF SUMMARY OF THE COMPLAINT**

**a. PLEASE DESCRIBE THE PRODUCT OR SERVICE YOU ARE COMPLAINING ABOUT (DESCRIPTION, EVIDENCE, AMOUNT AND**

**SUGGESTED WAY TO BE SOLVED)**

**b. PLEASE ENCLOSE RELEVANT DOCUMENTATION THAT MAY HELP THE COMPANY TO HANDLE THIS COMPLAINT**

**EFFICIENTLY. c. DATE OF COMPLAINT\***

Call direct:

+678 27 502 Email us: [support@titanfx.com](mailto:support@titanfx.com)

Website: [www.titanfx.com](http://www.titanfx.com)

