Complaints Handling Procedure

投诉处理程序

Product description: Precious Metal, FX, Crude Oil & Index

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1. Introduction

1.1. **HUA AN TAI CHANG GLOBAL LIMITED** (hereinafter referred to as the 'Company'), is incorporated under the laws of The Autonomous Island of Anjouan, Union of Comoros with Registration number 15979 having its registered office at Hamchako, Mutsamudu, Autonomous Island of Anjouan Union of Comoros. The Company is holding The International Brokerage and Clearing House License and authorized to conduct all type of brokerage activities in accordance with the Government Notice No. 005 of 2005 (herein the "Law") regulated by the Anjouan Offshore Finance Authority.

1.2. The objects and purposes of the Company is to offer different brokerage services for non-residents of the Autonomous republic of Anjouan; to carry on all or any of the business of the company and, without prejudice to the generality of the foregoing, to carry on, in conjunction with each other or as separate and distinct undertakings, all or any of the following businesses:

- providing direct consultations to investors on investments to clients, including issues concerning the price of securities, investment in securities, buying and selling of securities, as well as related foreign exchange transactions.
- consulting on securities issuance and money arising services.
- arranging and carrying out the distribution of the issuer's securities on a nonguaranteed basis.
- receiving and transmitting clients' orders in connection with securities, effecting transactions in securities for clients' accounts, with clients' funds.
- managing clients' investment portfolios and funds allocated for operations in securities.
- holding clients' investment funds and/or securities, providing safekeeping, custody and nominee services for securities.
- effecting transactions in securities for their own account with their own funds (proprietary trading).
- arranging and carrying out the distribution of the issuer's securities on a guaranteed basis.
- loaning securities to and borrowing securities from clients as well as using their own funds for the acquisition of securities for clients, engaging in short selling as defined in NBG regulations.
- Company services.
- Issuing of own deposit products.
- To provide loans and borrow funds (loan transactions).
- To carry out currency and exchange transactions.
- To hold assets, capital, precision metals, bonds, shares or another financial instrument for third parties.

- To accept cash deposits of any type (depositary transactions).
- Current Account to Corporate and Individual clients
- Fixed term deposit accounts.
- issuing Bank References and Certificates of Good Standing.
- To issue securities and credit cards processing.
- To provide guarantees of any type (guarantee business).
- Multi-Currency Accounts.
- Asset Management like products.
- Investment Consultancy Services.
- Financial Engineering (Private Banking and Wealth Management in combined product solutions)
- To act as intermediary in securities trading.
- To provide other permitted financial services.
- Forex trading.
- Forex Currency Exchange Operator (utility token and security token) CFD contract for difference.

1.3. The Company has implemented and maintains a Complaints Handling Procedure (the "Procedure"), which is described in this document.

2. Interpretation of Terms

Unless the context requires otherwise, all terms included in this Procedure shall have the meaning given to them herein. Where the context requires, (a) words importing the singular shall include the plural and vice versa and (b) words importing the masculine shall include the feminine and vice versa.

3. Scope of the Complaints Handling Procedure

The purpose of the Procedure is to set out the internal complaint resolution system and procedures which the Company has established, maintains and follows for the resolution of complaints.

4. Definition of a Complaint

4.1. A complaint is an expression of dissatisfaction by a Client regarding the provision of investment and/ or ancillary services provided to him by the Company. Complainant is the person, natural or legal, which is eligible for lodging a complaint to a Company and who has already lodged a complaint.

4.2. A complaint received by a Client shall include:

(a) the Client's name and surname;

(b) the Client's trading account number;

(c) the affected transaction numbers, if applicable;

(d) the date that the issue arose and a description of the issue.

4.3. A complaint must not include offensive language directed either to the Company or a Company employee.

5. Procedure

5.1. All complaints or grievances must be in writing and shall be addressed, to the Customer Support Department of the Company via email at info@hatcgroup.com (for any issues other than trading issues) or the Trading department reachable at info@hatcgroup.com for any trading issues.

5.2. If the client receives a response from the Customer Support or Trading Department but deems that the complaint or grievances needs to be raised further for an independent review, the client may either ask the Customer Support or Trading Department to escalate it to the Client Audit Team or directly contact the Client Audit Team (cs@hatcgroup.com), which will independently and impartially investigate it.

5.3. The Company will not be able to handle or investigate a complaint, if the requirements included in paragraphs 5.2 and 5.3 above are not fulfilled. In such an event the Company shall revert back to the Client and request him to send any additional information. In any event, one of the Company's officers may contact the Client directly in order to obtain further clarifications and information relating to his complaint. The Company shall need the Client's cooperation in order to handle the complaint.

5.4. Upon receipt of the complaint the department which has received the complaint shall record the complaint in the complaints registered maintained by the Company as per Par. 8 of the Procedure.

5.5. The Company shall thoroughly examine all complaints as required (taking into account any information contained within the books and records of the Company, including but not limited to the Client's trading account history) without undue delay.

5.6. The Company will treat each complaint with reasonable care and reach a fair outcome.

5.7. Upon receiving the complaint, the Company will inform the complainant within five (5) business days that it had received the complaint and provide him with a unique reference number, which shall correspond solely to his complaint and it must be used throughout his correspondence with the Company regarding the specific matter and/or complaint.

5.8. The Company shall send its initial response to the Client within ten (10) business days from the actual receipt of the complaint. If the complaint requires further investigation and it cannot be resolved it within ten (10) business days, it will issue a holding response in writing or in another durable medium. When a holding response is sent, it will indicate when the Company will make further contact and inform the Client on the progress of the investigation.

5.9. The Company shall investigate and reply to the complainant within two (2) months from the date of reception of the complaint.

5.10. Upon completion of the investigation the Company shall send a written notice to the complainant informing him:

(a) Of the outcome of the investigation along with the reasons for reaching such a decision; or

(b) If applicable, the nature and terms of any offer and/or settlement.

5.11. If the Company does not manage to conclude its investigation and/or respond to the complainant within two (2) months from the date of receipt of the complaint, the Company shall send a written notice explaining the reasons for not reaching a decision and/or concluding the investigation yet, the reasons for the delay as well as indicate the period of time within it shall be able to complete the investigation. It is noted that the Company shall not provide its response later than three (3) months from the submission of the complaint.

6. Principles of the Procedure

6.1. All complaints shall be treated confidentially.

6.2. The Company shall deal with Client's complaints without undue delay.

6.3. The company will resolve all complaints in a fair manner.

7. Record Keeping

The Company has established, maintains and updates the complaints register with details of all the complaints received per month for a period of five (5) years. The following information is recorded in the complaints register:

(a) date of the complaint;

(b) wallet number;

(c) identification of the complainant;

(d) complaint cause;

(e) the financial instrument;

(f) the disputed amount;

(g) settlement date if applicable; and

(h) any comments thereof.

8. Contacts

8.1. Customer Support Department: cs@hatcgroup.com

8.2. Trading Department: dealing@hatcgroup.com

8.3. Client Audit Team: cs@hatcgroup.com

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引言

HUA AN TAI CHANG GLOBAL LIMITED（以下简称"公司"）依据昂儒昂自治岛法律注册成立，注册号为15979，注册地址为昂儒昂自治岛穆察穆杜市哈姆查科区。公司持有国际经纪与清算牌照，并根据2005年第005号政府公告（以下简称"法律"）获准开展所有类型经纪业务，受昂儒昂离岸金融管理局监管。

公司宗旨是为昂儒昂自治共和国境外的企业与个人客户提供多元化经纪服务，包括但不限于：

- 为投资者提供证券价格、证券投资、买卖证券及相关外汇交易的直接咨询服务；
- 证券发行与资金相关服务咨询；
- 以非担保方式安排及执行发行人证券分销；
- 接收并传递客户证券交易指令，以客户资金执行其账户交易；
- 管理客户投资组合及证券操作资金；
- 托管客户投资资金及证券，提供保管、存管及代持服务；
- 以自有资金进行自营证券交易；
- 以担保方式安排及执行发行人证券分销；
- 向客户借入或借出证券，并利用自有资金为客户购买证券，进行符合法规的卖空操作；
- 发行自有存款产品；
- 提供贷款及借款服务；
- 执行货币与外汇交易；
- 为第三方持有资产、资本、贵金属、债券、股票或其他金融工具；
- 接受各类现金存款（存管交易）；
- 为企业及个人客户开立活期账户、定期存款账户；
- 出具银行资信证明及合规证书；
- 发行证券及处理信用卡业务；

- 提供各类担保服务；
- 多币种账户管理；
- 资产管理类产品；
- 投资咨询服务；
- 金融工程（私人银行与财富管理综合解决方案）；
- 担任证券交易中介；
- 外汇交易；
- 外汇货币兑换操作（实用代币与证券代币）差价合约（CFD）。

公司已实施并维护了投诉处理程序（以下简称"程序"），该程序在本文件中描述。

术语解释

除非上下文另有要求，否则本程序中包含的所有术语应在此处赋予的含义。在上下文需要的情况下，(a) 进口单数词应包括复数，反之亦然；(b) 进口阳性词应包括阴性，反之亦然。

投诉处理程序的范围

本程序的目的是规定公司已建立、维护并遵循的内部投诉解决系统和程序，以解决投诉。

投诉的定义

投诉是客户对公司向其提供的投资和/或辅助服务表示不满的表达。投诉人是符合向公司提出投诉条件并已提出投诉的自然人或法人。

客户收到的投诉应包括：

- 客户姓名和姓氏；
- 客户的交易账户号码；
- 受影响的交易号码（如适用）；
- 问题发生日期和问题的描述。

投诉不得包含针对公司或公司员工的攻击性语言。

程序

所有投诉或不满必须以书面形式提交，并通过电子邮件发送至公司的客户支持部门（info@hatcgroup.com，非交易问题）或交易部门（info@hatcgroup.com，交易问题）。

如果客户从客户支持或交易部门收到回复，但认为需要进一步独立审查投诉或不满，客户可以要求客户支持或交易部门将其升级至客户审计团队，或直接联系客户审计团队（cs@hatcgroup.com），后者将独立和公正地进行调查。

如果不满足上述第5.2和5.3段的要求，公司将无法处理或调查投诉。在此情况下，公司将回复客户并要求其提供任何额外信息。无论如何，公司的一名官员可能会直接联系客户，以获取有关其投诉的进一步澄清和信息。公司需要客户的合作来处理投诉。

收到投诉后，接收投诉的部门应按照程序第8段的要求，在公司维护的投诉注册簿中记录投诉。
公司将彻底审查所有投诉（考虑公司账簿和记录中包含的信息，包括但不限于客户的交易账户历史），不予不当延迟。

公司将以合理谨慎对待每项投诉，并达成公平结果。

收到投诉后，公司将在五个（5）个工作日内通知投诉人已收到投诉，并为其提供唯一的参考号码，该号码仅对应其投诉，在与公司就特定事项和/或投诉的任何通信中必须使用。

公司将在实际收到投诉后的十（10）个工作日内向客户发送初步回复。如果投诉需要进一步调查且无法在十（10）个工作日内解决，公司将以书面形式或另一种持久介质发出暂缓回复。发送暂缓回复时，将指明公司何时会再次联系，并向客户告知调查进展。

公司将在收到投诉之日起两个（2）个月内调查并回复投诉人。

调查完成后，公司将向投诉人发送书面通知，告知：

- 调查结果以及得出该决定的理由；或
- 如适用，任何提议和/或和解的性质和条款。

如果公司无法在收到投诉之日起两个（2）个月内完成调查和/或回复投诉人，公司将发送书面通知，解释尚未达成决定和/或完成调查的理由、延迟的原因，以及公司将在多长时间内能够完成调查。需注意的是，公司不得在提交投诉后的三个（3）个月后提供回复。

程序原则

- 所有投诉均应保密处理。
- 公司应不予不当延迟处理客户投诉。
- 公司将以公平方式解决所有投诉。

记录保存

公司已建立、维护并更新投诉注册簿，记录每月收到的所有投诉详情，保存期限为五年。投诉注册簿记录以下信息：

- 投诉日期；
- 钱包号码；
- 投诉人身份；

- 投诉原因；
- 金融工具；
- 争议金额；
- 如适用，和解日期；及
- 任何相关评论。

联系方式

- 客户支持部门：cs@hatcgroup.com
- 交易部门：dealing@hatcgroup.com
- 客户审计团队：cs@hatcgroup.com

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