

Dispute Resolution and Complaint Handling Policy

JUNE 2022

Privileged & Confidential

1.1 Complaints

- a) All complaints, whether oral or written, made against the Firm in relation to its conduct of financial services, should be directed to the CO who is responsible for ensuring that complaints are dealt fairly, efficiently, and with due diligence and consideration.
- b) A complaint is "any oral or written expression of dissatisfaction from a Client to an Authorised Person in connection with the provision of, or failure to provide, a Regulated Activity to the Client".

1.2 Receipt of Complaints

On receipt of a complaint, the Firm must record the complaint in the Register of Complaints and request the complainant to fill the Customer Complaints Form to initiate formal processing. The Firm must acknowledge receipt of the complaint in writing within 5 days by providing the complainant with:

- i. the contact details of any individual responsible for handling the Complaint;
- ii. key particulars of the Firm's handling procedures; and
- iii. a statement that a copy of the procedures is available free of charge upon request.

1.3 Investigation of Complaints

The Firm must ensure that any individual handling the complaint is not or was not involved in the conduct of the financial service about which the complaint has been made and is able to handle the complaint in a fair and impartial manner. The individual(s) responsible for handling the complaint must have sufficient authority to resolve the complaint or has access to individuals with the necessary authority. Normally, the CO or the SEO will be responsible for investigating any complaints and will be authorised to assign tasks involved in the investigation process to any person or employee as deemed appropriate in that situation. Complaints posing high risk to the Firm and depending upon severity of the matter involved, SEO should bring the matter to the attention of the Board.

1.4 Complaints involving other Authorised Persons or Recognised Bodies

- a) If the Firm considers that another Authorised Person or a Recognised Body is entirely or partly responsible for the subject matter of a complaint, it may refer the complaint, or the relevant part of it, to the other Authorised Person or Recognised Body as detailed below in section (b).
- b) When referring a complaint to another Authorised Person or Recognised Body the Firm must:

Regulated by the ADGM Financial Services Regulatory Authority

- i. inform the complainant promptly and in writing that it would like to refer the complaint, either entirely or in part, to another Authorised Person or Recognised Body and obtain the written consent of the complainant to do so;
- ii. if the complainant consents to the referral of the complaint, refer the Complaint to the other Authorised Person or Recognised Body promptly and in writing;
- iii. inform the complainant promptly and in writing that the complaint has been referred and include adequate contact details of any individual at the other Authorised Person or Recognised Body responsible for handling the complaint; and
- iv. continue to deal with any part of the complaint not referred to the other Authorised Person or Recognised Body, in accordance with this policy.

1.5 Resolution of Complaints

- a) The Firm aims to resolve all complaints within 30 days. If the resolution is taking longer the Firm must provide an update in writing to the complainant.

Upon conclusion of an investigation of a complaint, the Firm must promptly:

- i. advise the complainant in writing of the resolution of the complaint;
 - ii. provide the complainant with clear terms of redress, if applicable; and
 - iii. comply with the terms of redress if accepted by the complainant.
- b) If the complainant is not satisfied with the terms of redress offered by the Firm, the Firm must inform the complainant of other avenues, if any, for resolution of the Complaint and provide him with the appropriate contact details upon request.
- c) Other avenues for resolution of a complaint may include an external dispute resolution scheme, arbitration or the ADGM Courts.
- d) The CO must record the resolution in the Register of Complaints and, if applicable, the steps the firm has taken to remedy a recurring or systemic problem revealed by the complaint.

1.6 Record Keeping

- a) This Register of Complaints will contain the name of the complainant, the substance of the complaint, a record of the Firm's response, and any other relevant correspondence or records, and the action taken by the Firm to resolve each complaint.
- b) The Firm must maintain a record of all complaints made against it for a minimum period of six years from the date of receipt of a complaint.

Appendix 4. ACM Limited CUSTOMER COMPLAINT FORM

Please provide the following information in order for us to consider and investigate your grievance and take appropriate remedial action.

1. Details of the Person(s) or Organisation(s) filing the Complaint ("the Complainant").	
Name:	Phone No: Email ID:
Address:	
Relationship with ACM Limited:	

2. Please provide details of your complaint and attach additional sheets if required.

Complaint Details:

.....

.....

.....

.....

.....

.....

Regulated by the ADGM Financial Services Regulatory Authority

Desired / Requested Outcome:

.....

.....

.....

Attachments (if any):

1.
2.
3.

3. Submission of Complaint and ACM's Complaints Handling Procedures.

You can submit your complaint to **ACM**, addressed to the Compliance Officer by the following modes, on the address provided below:

Attn: The Compliance Officer

ACM Limited

.....

.....

Abu Dhabi, UAE

Email:

Tel No:

Fax No:

Please select the mode of submission of your Complaint:

By Post ☐ By Hand ☐ By Email* ☐ By Fax ☐

*Note: If you submit your complaint through email, you must submit: an electronic scan of your signature; or alternatively, if emailed without scan, you may send a signed version of the complaint through post, fax, or hand delivery at the same time as sending your email.

Please Confirm if you would like to receive a copy of ACM's Complaints Handling Procedures (free of charge) – If yes, please provide the preferred mode of delivery:

Yes ☐

No ☐

Mode of Delivery:

.....

4. Declaration and Signature

I certify that the information provided on this form is true and correct to the best of my knowledge.

Date:

.....

Signature:

.....