



APM Capital

Complaints Handling Policy

Introduction

This Complaints Handling Policy (hereafter referred to as the “Policy”) defines the principles that apply to APM Capital Limited (hereinafter referred to as the “Company” or “APM”), which is incorporated and registered under the laws of Abu Dhabi Global Markets (“ADGM”) with registration number 000005466 and registered address at 1009, Level 10, Al Khatem Tower, Abu Dhabi Global Market Square, Al Maryah Island, Abu Dhabi, United Arab Emirates. The Company is regulated by the Financial Services Regulatory Authority (FSRA) under license number 200034 for the provision of investment services.

The purpose of this Policy is to define the arrangements employed by APM for the reasonable and prompt handling of complaints. The Company will act in accordance with the best interests of its clients and will ensure it has appropriate systems and controls in place so that its clients, including potential clients, have access to adequate complaints handling and redress mechanisms that are accessible, independent, fair, accountable, timely and efficient. For the purposes of this Policy, Complaint shall mean an expression of dissatisfaction by a client regarding the provision of investment services provided to him/her by the Company.

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

Definition

The Company classifies a complaint as any objection and/or dissatisfaction that the Client may have with regards to the provision of the services provided by the Company. A complaint form is enclosed at the end of this policy.

Procedure

The Compliance Officer shall be responsible to ensure the proper handling of Client complaints, except in the case where the complaint involves the Compliance Officer, whereby the complaint shall be handled by the Representative Officer.

The Client may register a complaint by completing the complaint form, using any of the following options:

- Email: compliance@apmcapital.ae
- Postal Address: 1009, Level 10, Al Khatem Tower, Abu Dhabi Global Market Square, Al Maryah Island, Abu Dhabi, United Arab Emirates

1. When the Company receives the Client’s complaint then a written acknowledgement will be sent to the Client within 7 business days;

2. The Company will attempt a final response within 30 business days, however in case we are still not in a position to resolve the issue then the Company will notify you in writing stating the reasons

for the delay and indicate an estimated time to resolve the issue.

3. A final response should be provided to the Client within 60 business days the latest from the date he submitted his complaint;

4. In the case where the complainant is still not satisfied with the Company's final response, then the complainant can refer his complaint with a copy of the Company's final response to the Financial Services Regulatory Authority (FSRA) in ADGM, Abu Dhabi for further examination.

The complainant can submit a complaint via the FSRA website:

<https://www.adgm.com/operating-in-adgm/additional-obligations-of-financial-services-entities/enforcement/complaints/submit-a-complaint>

Client Records

The Client should provide all relevant documentation as well as any additional information requested by the Company in order to ensure all records are collected and the complaint is properly resolved on time. All records will be kept safe as per local requirements and for a period of six (6) years.

The complaint form can be found in the next page.

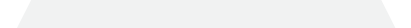
Complaint Form

A. Client Information:

Name:	Account Number:
Address:	Telephone Number:

B. Type of Complaint

1. Execution of Orders	☐
2. Quality or lack of information provided	☐
3. Terms and Conditions/Fees/Charges	☐
4. General admin/Customer Services	☐
5. Unauthorized business being offered	☐
6. Issue in relation to withdrawal of funds	☐
7. Other (specify)	☐



C. Brief Summary of the Complaint: Please describe the product or service you are complaining about (description, evidence, amount and suggested way to be solved):

- Please enclose any other relevant documentation that may help us to handle the complaint. - Possible documentation to be provided (client statement, correspondence with the Company as well as any other supporting documentation to be requested by the Compliance Officer which is relevant to the Client's complaint)

Date:

Client Signature:

Client Name: