

COMPLAINTS MANAGEMENT POLICY

NGDEM Global Limited

This policy governs the procedure for considering and settlement of complaints made by Retail and Professional clients against NGDEM Global Limited (from now on – the Firm) in connection with the provision by the Firm of Regulated Activities under its License (the "Complaints").

Any capitalised terms used but not defined herein shall have the meaning given to them in the Glossary.

I. Definitions

In the Policy, except where it follows otherwise from the context:

- (a) "AIFC" means the Astana International Financial Centre;
- (b) "AFSA" means the Astana Financial Services Authority;
- (c) "Complainant" means any person, natural or legal, which is eligible for lodging a Complaint to the Firm and who has already lodged a Complaint;
- (d) "IAC" means International Arbitration Centre in the AIFC;
- (e) "Glossary" means the AIFC Glossary (AIFC Act No. FR0017 of 2018);
- (f) "Policy" means this Complaints Management Policy.

II. Lodging and investigation of Complaint

1. Suppose a Complainant has any objection concerning the provision of investment and ancillary services and/or the performance of investment activities. In that case, submitting a complaint at info@ngdem.com with the subject of the e-mail "Client complaint" is encouraged.
2. The Customer Support confirms, within 3 (three) working days of receiving the Complaint to the Complainant and informs the Complainant about the unique reference number and that it should use the said reference number in all future contact with the Firm and/or AFSA regarding the specific Complaint as well as the process that will be followed when handling a Complaint (e.g. when the Complaint will be acknowledged, indicative handling time, the availability (where applicable) to contact the AFSA, IAC or the AIFC Court).
3. Within 60 (sixty) calendar days of the investigation of the Complaint, the Firm must inform the Complainant in writing about the study's outcome. Suppose the Firm cannot respond within 60 (sixty) calendar days. In that case, it must inform the Complainant of the reasons for the delay and indicate the expected period within which the investigation will be completed. This period cannot exceed 90 (ninety) calendar days from submitting the Complaint.
4. During the investigation of the Complaint, the Firm informs and updates the Complainant of the handling process of its Complaint every 10 (ten) business days.
5. When providing a final decision that does not fully satisfy the Complainant's demands, the Firm notifies the Complainant in writing using a thorough explanation of its position on the Complaint. It sets out the Complainant's option to maintain the Complaint, e.g. through the AFSA, IAC, or the AIFC Court.
6. A Complainant may use the following authorities to file an appeal against a final decision or in cases of a delay in a final decision:
 - i. AFSA: Astana International Financial Center Financial Services Authority Astana, 55/17 Mangilik El Avenue, C 3.2 P.O. Box 010000, Republic of Kazakhstan Telephone: +7 7172 91 90 01 or 8 800 080 08 01 Website: <http://www.afsa.aifc.kz>
 - ii. International Arbitration Centre (IAC) Astana, 55/16 Mangilik El Avenue, C 3.1 Level 1, P.O. Box 010000, Republic of Kazakhstan Telephone: +7 (717) 264 73 37 or +7 (701) 981 73 20 E-mail: info@aifc-iac.kz
 - iii. AIFC Court Astana, 55/16 Mangilik El Avenue, C 3.1 Level 1, P.O. Box 010000, Republic of Kazakhstan Telephone: +7 (717) 264 73 37 or +7 (701) 981 73 20 E-mail: info@aifc-court.kz