Complaints Policy

GEM Introducing Financial Services L.L.C. (**"GEM"**) is committed to dealing with complaints fairly, promptly and transparently. This Complaints Procedure forms part of and must be read in conjunction with, the Website Terms of Use, the Regulatory Disclosures and the Privacy Policy. It explains how to file a complaint, the process and the timeframes you can expect.

1. Scope

This procedure applies to complaints about GEM's introducing service. As GEM provides an introduction only, complaints about a financial product, account, transaction or service provided by an independent third-party provider (a **"Provider"**) should be raised with that Provider under its own complaints process. Where a complaint relates to a Provider, including its products, services, account, transactions or conduct, you should raise the complaint directly with the relevant Provider in accordance with its complaints procedure. We will continue to handle any part of your complaint that relates to GEM or our services in accordance with this Complaints Policy. Where we consider that a Provider or another body is wholly or partly responsible for the subject matter of your complaint, we will write to you, by dated letter, to tell you that we propose to refer your complaint (or the relevant part of it) to that body. If you agree, we will refer it promptly and confirm to you in writing the date of referral, the name of the person responsible for your complaint at that body and their contact details. We will continue to handle any part of your complaint that has not been referred to. If you do not agree to the referral, or we do not hear from you within ten (10) business days, we will either determine your complaint on the basis of the information and documents available to us, or return your complaint to you together with the supporting material so that you may file it directly with the relevant or competent body.

2. How to File a Complaint

You may submit a complaint by any of the following means:

i. by email to compliants@gem-uae.com

ii. by post to Business Bay, Bay Square 10, office 108, marked for the attention of the Compliance Officer followed by email to complaints@gem-uae.com

We accept complaints in any form and in either Arabic or English.

A copy of this Complaints Policy is available on our website and will also be provided to you free of charge on request.

3. Information to Include in a Complaint

To help us investigate your complaint, kindly include:

i. your full name and contact details;

ii. the full facts relating to your complaint and the issue at hand;

iii. relevant dates and any reference details; and

iv. copies of any relevant correspondence.

v. the outcome you are seeking.

If any of this information is missing we will still register your complaint, and will contact you if we need anything further in order to investigate it.

4. Process

- We will record your complaint in our complaints register immediately on receipt.
- We will acknowledge your complaint in writing within two (2) business days of receiving it and our acknowledgement will include the name and contact details of the person handling it.
- Your complaint will be handled by a person who was not involved in providing the service to which your complaint relates, and who either has the authority to resolve your complaint or has direct access to the person who does. Your complaint will be assessed fairly and impartially.
- We will seek to resolve your complaint within five (5) business days of receiving it. Where that is not possible, we will provide you with an update on the steps we are taking after we receive your complaint, and at regular intervals after that until your complaint is concluded.
- If any part of your complaint is about the institution that holds your account rather than about us, we will tell you clearly which firm is responsible for which part, pass that part to them, and follow up.
- We will investigate the parts that concern us, and someone who was not involved in what you are complaining about will look into it.
- We aim to provide a final written response within thirty (30) calendar days of receiving your complaint. If we need more time due to the matter being complex, we will inform you in writing, explain the reasons and tell you when you can expect our final response.

- If we got something wrong, we will say so, put it right and tell you what we have done to stop it happening again.
- Our final response will be in writing, will be dated with the date on which the decision on your complaint was made, and will set out the outcome and the reasons for it.

We reserve the right to request any further information or documentation from you as we reasonably consider necessary to investigate and assess your complaint.

If you are not satisfied with the response you receive, you may ask for your complaint to be reviewed by GEM's Compliance Officer or, where the Compliance Officer has already been involved in the matter, by a member of GEM's Board of Directors. Please write to us at gemamlcompliance@gem-uae.com setting out why you remain dissatisfied.

5. Further Complaints Process

If you are not satisfied with our final response, you may refer your complaint to our regulator, the Capital Market Authority, through the channels the regulator makes available for consumer complaints. Referring a complaint to the regulator does not affect any other legal rights you may have.

6. Our Records

We keep a record of all complaints and their outcomes in a complaints register, together with the related documents and correspondence and the steps we have taken. We retain these records for a period of not less than five (5) years. We monitor and analyse complaints and report on them internally, and we use them to improve our service. Personal data collected in handling your complaint is processed in accordance with our Privacy Policy and Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data.

7. Contact

For any questions about this Complaints Policy, contact us at compliants@gem-uae.com

This Policy is issued in Arabic and English. In the event of any inconsistency between the two versions, the Arabic version shall prevail.