

Dispute Resolution Policy

City Index Australia Pty Ltd trading as FX Solutions Australia (“FX Solutions”)

At FX Solutions we take complaints very seriously. If you have any complaint in relation to the services provided to you, you should inform us immediately.

Set out below are the procedures for the handling of complaints and disputes with respect to the provision of financial services by FX Solutions.

1. Dispute resolution system

FX Solutions dispute resolution system consists of:

- (a) Internal Dispute Resolution (IDR) procedures that comply with Australian Securities and Investments Commission (“ASIC”) standards and that cover complaints made by retail clients about the financial services provided;
- (b) Membership of Financial Ombudsman Service (FOS), an external dispute resolution scheme, approved by ASIC, that covers complaints made by retail clients in relation to the financial services provided by FX Solutions.

1.1. How complaints are received and dealt with

When a client complains, the person to whom the complaint is directed has 24 hours to attempt to resolve the complaint directly with the client.

If the complaint cannot be resolved within 24 hours by the relevant staff member it must be escalated to The Compliance Officer, Australia.

Within 5 business days of being notified of the complaint, The Compliance Officer, Australia will ensure that an acknowledgement letter is sent to the client identifying themselves as the person who will handle the complaint and to explain the complaints handling process and any rights they have.

1.2. Maximum time frame for dealing with a complaint

The Compliance Officer, Australia will act as an impartial investigator and will attempt to resolve the complaint with the client within 4 weeks of the acknowledgement letter being sent.

If the complaint cannot be resolved within the 4 week period then a more detailed letter will be written to the client explaining this fact and, if necessary, seeking further information. The Compliance Officer, Australia will then have an additional 4 weeks to resolve the complaint.

1.3. Remedies for resolving complaints

Each complaint received by FX Solutions is handled case-by-case, and applicable remedies will vary due to the unique circumstances of each complaint. These remedies include, but are not limited to: written or verbal explanation of the issue; referring to and explaining disclosure documents and inherent risks; offering a product or subscription service for a reduced rate; refunding or crediting a client account; assisting complainants in formulating or lodging complaints; and determining and implementing case-specific remedies. Complaints will be handled at no charge to the complainant, subject to statutory requirements.

1.4. Referring unresolved complaints to an External Dispute Resolution scheme (EDR Scheme)

A final determination letter will be sent after 8 weeks of investigation and it will explain the options the client may have to further pursue the matter, ie, pursuing the matter with FX Solutions Australian EDR Scheme, FOS.

1.5. Recording and monitoring of complaints

The Compliance Officer, Australia ensures that a register of all complaints is maintained.

The Compliance Officer, Australia, at a minimum, reviews the complaints history twice a year, and documents the results and any comments or recommendations in the relevant monthly compliance report.

In addition, FX Solutions complaints history will be reviewed as part of the annual compliance audit/compliance monitoring program. The results of the review and any comments or recommendations will be detailed in the post compliance audit report.

The information that relates to individuals (or systems) is shared with the relevant people, their supervisors, and HR and forms part of the consideration of the individuals and their managers' competence assessments and personal development plans.

1.6. Guides to Internal Dispute Resolution procedures (IDR Procedures) available to clients

FX Solutions provides all clients with terms and conditions which detail the IDR procedures and which are also available from FX Solutions on request.

1.7. Documenting IDR Procedures

All FX Solutions staff members are made aware of the procedures for handling complaints. Upon joining FX Solutions, new staff members are given an electronic copy of the Compliance Procedures Manual and are asked to sign that they undertake and agree to comply with its requirements. A full copy of

the Compliance Procedures Manual is available online for reference by staff members at all times.

2. EDR Scheme

2.1. Membership to FOS

The Financial Ombudsman Service (FOS) is an ASIC approved EDR scheme which can deal with complaints about all of the financial services that FX Solutions will provide to retail clients under its AFS licence namely:

- provide financial product advice;
- make a market; and
- deal

in derivatives and foreign exchange products.

The Compliance Officer, Australia, has the primary responsibility for dealing with FOS.

Complaints that cannot be resolved via the internal procedure detailed above may be referred to FOS.

In most cases FOS will then facilitate discussion and, as appropriate, negotiation between the parties. At this stage the issues that are in dispute will be identified. If the dispute cannot be resolved through discussion, FOS will facilitate conciliation between the parties. The conciliation will attempt to assist the parties to settle the dispute and agree on the terms of a settlement.

We understand that if a conciliation does not result in a resolution of the dispute, the matter can be referred to relevant law, fairness and reasonableness of the dispute. As a member of FOS, any decision by the adjudicator or panel is binding on FX Solutions and on you if you accept it. If you do not accept the decision, you may pursue the dispute in another forum.

Further information can be found on their website www.fos.org.au

Pursuant to the requirement in condition 19 of City Index's AFS licence, if CITY INDEX AUSTRALIA PTY LTD ceases to be a member of FOS or other EDR Scheme, The Compliance Officer, Australia is to notify ASIC within 3 business days, stating:

- the date CITY INDEX AUSTRALIA PTY LTD ceases membership;
- the reasons CITY INDEX AUSTRALIA PTY LTD membership of the EDRS(s) has ceased (including circumstances where the EDRS is no longer operating, failure by the licensee to renew their membership of the EDRS or where the EDRS has terminated the licensee's membership of the EDRS);

- details of the new EDRS(s) CITY INDEX AUSTRALIA PTY LTD intends to or has joined (including the date the membership commences and the name of the EDRS); and
- details that provide confirmation that CITY INDEX AUSTRALIA PTY LTD is covered by EDRS(s) covering complaints made by retail clients in relation to the provision of all of the financial services authorised by this licence.