

# Complaints Procedure

## 1. INTRODUCTION

We, **KEY WAY MARKETS LTD** (hereinafter, the “Company”), have adopted this Complaints Procedure in order to ensure a fair and quick process for handling complaints that may arise from our relationship with you. The Company shall ensure that it’s acting in accordance with relevant laws and regulations both to ensure protection of its clients and/or potential clients and also adherence to its legal and/or regulatory obligations. 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. This Complaints Procedure is made available to you free of charge and upon request.

**KEY WAY MARKETS LTD** operating trade name “naga.com/ae” is incorporated in Abu Dhabi Global Market (ADGM) under Company Registration Number 000003041 and licensed and regulated by the ADGM Financial Services Regulatory Authority (License no. 190005) of the United Arab Emirates, having its registered address at Al Sila Tower, 21st Floor, Office No. 2, ADGM Square, Al Maryah Island, Abu Dhabi - UAE.

## 2. GENERAL PRINCIPLES

This Policy shall follow the undernoted principles:

- fair treatment of clients;
- complaints raised by clients are dealt with courtesy and on time;
- clients are fully informed of avenues to escalate their complaints and their rights to
- alternate remedy if they are not fully satisfied with Company’s response to their complaints;
- the Company will treat all complaints efficiently and fairly as they can damage the Company’s reputation and business if handled otherwise;
- the Company’s employees must work in good faith and without prejudice to the interests of the clients.

Considering the above, the Company shall:

- establish and maintain a complaints management procedure for clients which shall provide clear, accurate and up-to-date information about the complaints-handling process;
- communicate to clients in plain language that is clearly understood and provide a response to the compliant without any unnecessary delay;
- explain to the client, the Company’s position on the complaint and set out the client’s options, where relevant, that they may be able to take civil action;
- provide information on complaints and complaints-handling to the Abu Dhabi Global Market if needed;

### Key Way Markets Ltd

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**Registered Address:** Office 2, 21st Floor, Al Sila Tower, Al Maryah Island, Abu Dhabi, United Arab Emirates

**Website:** [www.naga.com/ae](http://www.naga.com/ae)

**Contact Email:** [support.ae@naga.com](mailto:support.ae@naga.com)

**Support Number:** +97122455100

analyze complaints and complaint-handling data to ensure that they identify and address any risks or issues.

### 3. COLLECTION OF INFORMATION

In order to investigate and resolve potential complaints received, the Company shall collect and record the following information:

- Date of receipt of the complaint;
- Details of the client submitting the complaint, including:
  - Name and Surname of the Complainant;
  - The email the Complainant used to register with the Company (Registered Email)
  - The number of the Complainant's Trading Account which the complaint refers to (Account No.)
  - National Identification and/or Passport Number;
  - Country of Residence.
- Content and reason of the complaint, including:
  - The complaint cause;
  - The financial instrument involved;
  - The disputed amount;
  - The settlement date.
- Service/department to which the complaint relates to;
- Magnitude of the damage which the client claims to have suffered and/or which can be presumed to have suffered on the basis of the contents of the complaint;
- Date of the Company's answer;
- The content of Company's written response to the complaint lodged;
- Reference to any correspondence exchanged between the Company and the client which should be attached to the Company's file for internal recordkeeping requirements.

### 4. SUBMITTING YOUR COMPLAINT

You may submit your complaint in writing and addressed to the **Complaints Management Function** of the Company who is authorized to handle and investigate complaints that may be submitted to them from our Clients.

You are encouraged to use the **Complaints Form** attached herein and submit it electronically at the following email address: [complaints.ae@naga.com](mailto:complaints.ae@naga.com).

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Any further supporting documentation for the Client's claims may be sent along with the Complaint Form. If the client has any supporting and/or documentary evidence to support the complaint, the client should ensure that such information is collected and forwarded to the Company using the above stated method.

Where a complaint is made by the client through a legal representative (e.g., an attorney, public legal counselor) the Complaint Form and the required documentation shall be accompanied by a duly executed written authorization of the legal representative to represent or act on the behalf of the client.

## 5. ACKNOWLEDGING AND HANDLING OF CLIENT'S COMPLAINT

For an investigation to be fair, it shall be thorough, although the Company aims to conclude cases as quickly as possible, without undue delays, and always within the timeframes of the law, as follows:

- within seven (7) days, the client shall receive confirmation of receipt of its complaint and the Compliance Officer is responsible for handling an internal complaint register (hereafter referred to as the "Complaints Register"). Upon receiving the complaint, the Compliance Officer shall register the complaint on the Complaints Register, giving it a unique reference number;
- the unique reference number is communicated to the complainant by the Compliance Officer who informs the complainant that he should use the said reference number in all future communication and correspondence with the Firm, regarding the specific complaint;
- The Company shall make every effort to investigate the client's complaint and provide them with the outcome of its investigation within two (2) months from the date the client has submitted their complaint to the Company.
- During the investigation process will keep the client updated on the handling process of their complaint (within the 1<sup>st</sup> month). One of the Company's officers may contact the client directly (including communication by email or phone) in order to obtain, where needed, further clarifications and information relating to their complaint.
- In such circumstances, the Company will require client's full cooperation for the investigation and possible resolution of their complaint.
- the Company shall consider client's complaint as closed and cease the relevant investigation in case he/she fails to respond to the Company's officers within the period of three (3) months from the date of the submission of his/her complaint.

## 6. INTERNAL ANALYSIS AND CORRECTION OF COMPLAINTS

It shall be the responsibility of the complaints management function to analyse, on an ongoing basis, complaint-handling data to ensure that recurring or systemic problems and potential legal and operational risks are identified and addressed. Such analysis shall include the causes of complaints so as to identify root causes common to such types of complaints. The root causes shall then be considered to determine whether they may affect other processes or products, including those not directly complained of. The Company shall ensure that root causes are corrected, where reasonable.

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## 7. Final Decision

When the Company reaches an outcome, it will inform the Client of it together with an explanation of its position and any remedial measure it intends to take (if applicable). The Company will ensure it complies with any terms of redress promptly.

It is understood that the client's right to take legal action remains unaffected by the existence or use of any complaint's procedures referred to above.

If the client is not satisfied with the Company's final decision, he/she may submit his/her complaint to other independent bodies such as an external dispute resolution scheme, arbitration or the Regulatory Committee, Appeals Panel or Court in the ADGM.

## 8. RECORD KEEPING

The Company maintains records of all complaints as well as all related details for a minimum period of six (6) years after termination of the business relationship with its clients and in accordance with the applicable record keeping legislative requirements.

## 9. REVIEW AND MONITORING OF THIS POLICY

The Compliance Function monitors the effectiveness of this Policy and complaint management procedures as part of its compliance monitoring program. This Policy is reviewed periodically and no less than annually, to ensure that it continues to meet the Company's regulatory and compliance obligations.

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## COMPLAINTS FORM

This is the form you need to fill in if you wish to submit your complaint to KEY WAY MARKETS LTD (the “Company”). Complete, up-to-date as well as accurate information is required to be provided to the Company for the proper investigation and evaluation of your complaint.

Please note that the below Complaint Form is only indicative and not exhaustive. The Company may request further information and/or clarifications and/or evidence as regards to your complaint.

Please provide the following 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”).	
<b>Full Name:</b>  .....	<b>Phone No:</b>  .....
<b>ID/Passport Number:</b>  .....	<b>Country of Residence:</b>  .....
<b>Residential Address:</b>  .....	
<b>Mailing Address:</b>  .....	
<b>Relationship with Key Way:</b>  .....	

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### Complaint Details:

[illegible]

.....

.....

.....

1. ....
2. ....

3. ....  
4. ....

### 3. Submission of Complaint and Key Way's Complaints Handling Procedures.

You can submit your complaint to Key Way Markets Limited, addressed to the SEO/Compliance Department by the following modes, on the address provided below:

**Attn: The SEO/Compliance Department**

Key Way Markets Limited  
Al Sila Tower, 21st Floor, Office No. 2,  
ADGM Square, Al Maryah Island, Abu  
Dhabi, UAE

Email: [support.ae@naga.com](mailto:support.ae@naga.com)

Tel No: +971 2 245 5150

Please select the mode of submission of your Complaint:

By Post ☐ By Hand ☐ By Email\* ☐

\*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 Key Way'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:

.....

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