

# NobleFXM

## Dispute Resolution Policy

Effective Date: [TO BE CONFIRMED]

Version: DRAFT v1

Classification: Confidential

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IT DOES NOT CONSTITUTE FINAL LEGAL ADVICE AND IS NOT INTENDED FOR CLIENT DISTRIBUTION.**

NobleFXM, Ltd  
Saint Lucia International Business Company (IBC)  
Registration No. 2026-00159  
Ground Floor, The Sotheby Building, Rodney Bay, Gros-Islet, Saint Lucia

## DISPUTE RESOLUTION POLICY

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### 1. INTRODUCTION

NobleFXM, Ltd ("the Company"), a Saint Lucia International Business Company (IBC) with registration number 2026-00159, is committed to providing a fair, transparent, and efficient process for resolving complaints and disputes with its clients. This Dispute Resolution Policy ("Policy") outlines the procedures for submitting, handling, and resolving complaints.

This Policy applies to all clients of the Company and should be read in conjunction with the Company's Agreement to Open an Account.

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### 2. DEFINITIONS

- "Complaint" means any expression of dissatisfaction by a client regarding the Company's services, products, staff conduct, or policies, where the client expects or seeks a resolution.
- "Inquiry" means a request for information or clarification that does not constitute a complaint. Inquiries are handled by the Company's customer support team and are not subject to the formal complaints process.
- "Dispute" means a complaint that has not been resolved to the client's satisfaction through the initial complaints process and has been escalated.

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### 3. HOW TO SUBMIT A COMPLAINT

#### 3.1 Complaints may be submitted through any of the following channels:

- Email: [compliance@noblefxm.com](mailto:compliance@noblefxm.com)
- Written letter: Compliance Department, NobleFXM, Ltd, Ground Floor, The Sotheby Building, Rodney Bay, Gros-Islet, Saint Lucia, P.O. Box 838, Castries, Saint Lucia
- Online contact form: <https://www.noblefxm.com/contact> (select "Complaint" as the topic)

#### 3.2 When submitting a complaint, the client should include:

- Full name and trading account number
- A clear and detailed description of the complaint, including relevant dates, transaction references, and the circumstances giving rise to the complaint
- Copies of any supporting documentation (e.g., screenshots, email correspondence, transaction records)
- The resolution or remedy the client is seeking

3.3 Complaints should be submitted in English. If the client is unable to submit in English, the Company will make reasonable efforts to accommodate, but processing may take longer.

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### 4. ACKNOWLEDGEMENT

The Company will acknowledge receipt of a complaint within [SPECIFY: e.g., two (2) Business Days] of receipt. The acknowledgement will include:

- A unique complaint reference number
- The name and contact details of the complaint handler assigned to the case
- An estimated timeframe for the investigation and response

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### 5. INVESTIGATION PROCESS

5.1 Upon receipt, each complaint is reviewed and assigned to an appropriate complaint handler within the compliance team. The investigation may involve:

- Reviewing the client's account records, transaction history, and relevant correspondence
- Consulting with the relevant department(s) (e.g., trading desk, IT, finance)
- Requesting additional information or documentation from the client

## DISPUTE RESOLUTION POLICY

Effective Date: [TO BE CONFIRMED]

- Reviewing applicable policies, terms, and regulatory requirements

5.2 The Company will conduct the investigation fairly and impartially. The complaint handler will not be the individual who is the subject of the complaint (where applicable).

5.3 The Company may contact the client during the investigation to request clarification or additional information. The client is expected to cooperate with the investigation and to respond to requests in a timely manner.

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## 6. RESOLUTION TIMEFRAMES

6.1 The Company aims to resolve complaints within [SPECIFY: e.g., fifteen (15) Business Days] of receipt.

6.2 If the complaint is complex or requires further investigation, the Company will notify the client that additional time is needed and will provide an updated estimated resolution date. In any event, the Company will aim to provide a final response within [SPECIFY: e.g., thirty-five (35) Business Days] of receipt.

6.3 The final response will include:

- A summary of the complaint
- The Company's findings and conclusions
- Any remedial action taken or proposed
- The client's right to escalate if dissatisfied with the outcome

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## 7. REMEDIES

Where a complaint is upheld (in whole or in part), the Company may offer one or more of the following remedies:

- Financial compensation or adjustment to the client's account
- Reversal or correction of an erroneous transaction
- An apology and explanation
- Changes to the Company's processes or procedures to prevent recurrence
- Other appropriate remedy agreed between the Company and the client

The Company will endeavour to offer fair and reasonable remedies in all cases.

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## 8. ESCALATION PROCEDURE

### 8.1 Internal Escalation

If the client is not satisfied with the outcome of the initial complaint investigation, the client may escalate the matter to a senior compliance officer by writing to [compliance@noblefxm.com](mailto:compliance@noblefxm.com) with the complaint reference number and a statement of why the client is dissatisfied with the initial resolution.

The senior compliance officer will review the complaint afresh and provide a final internal response within [SPECIFY: e.g., fifteen (15) Business Days] of the escalation.

### 8.2 External Dispute Resolution

If the client remains dissatisfied after the internal escalation process, the client may refer the dispute to an external dispute resolution body.

**[COUNSEL TO REVIEW: Identify and specify the appropriate external dispute resolution body or ombudsman. Under Saint Lucia law, determine whether there is a financial ombudsman or ADR scheme available for disputes involving IBC-registered brokerages. If no statutory ADR body exists, consider whether the Agreement should provide for arbitration (e.g., under the Saint Lucia Arbitration Act or a recognised international arbitration institution).]**

The client's right to seek external dispute resolution does not affect the client's right to pursue independent legal advice or to initiate legal proceedings.

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## 9. RECORD KEEPING

## DISPUTE RESOLUTION POLICY

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The Company maintains a centralised complaints register that records all complaints received, the steps taken to investigate each complaint, the outcome, and any remedial action taken.

Complaint records are retained for a minimum of [SPECIFY: e.g., five (5) years] after the complaint is resolved, in accordance with the Company's record-keeping obligations under applicable law.

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### 10. SYSTEMIC ISSUES

The Company analyses complaints data on a periodic basis (at least quarterly) to identify systemic issues or recurring themes. Where a pattern of similar complaints is identified, the Company will take appropriate action to address the root cause, including revising policies, procedures, or systems as necessary.

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### 11. FAIR TREATMENT

The Company is committed to treating all clients fairly throughout the complaints process. No client will be disadvantaged for submitting a complaint. The Company prohibits retaliation against clients who submit complaints in good faith.

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### 12. CLIENT'S RIGHT TO INDEPENDENT ADVICE

The Company respects the client's right to seek independent legal or financial advice at any stage of the complaints process. The costs of independent advice are borne by the client unless otherwise agreed.

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### 13. POLICY REVIEW

This Policy is reviewed at least annually and updated as necessary to reflect regulatory changes, feedback from the complaints process, or changes to the Company's operations.

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### 14. CONTACT

For complaints or questions about this Policy, please contact:

Compliance Department

NobleFXM, Ltd

Email: [compliance@noblefxm.com](mailto:compliance@noblefxm.com)

Address: Ground Floor, The Sotheby Building, Rodney Bay, Gros-Islet, Saint Lucia, P.O. Box 838, Castries, Saint Lucia