

COMPLAINTS HANDLING POLICY

1. INTRODUCTION

Royal Financial' Complaints Policy aims to establish effective and transparent procedures for the reasonable and prompt handling of complaints. Senior management, including the Compliance Officer, will take reasonable steps to identify and design remedies for any recurring or systemic problems that are identified based on complaints filed under this policy. Royal Financial representatives must refer to this policy when handling customer complaints.

2. SCOPE AND PURPOSE

This policy has been created in accordance with the requirements outlined in the ASIC regulatory guide 271. The Company is obliged to establish, apply, and maintain efficient and transparent procedures for the fair and timely handling of complaints or grievances submitted by complainants. It must also keep records of every complaint and any measures taken by the Company to resolve the matter. This Policy outlines the procedure for submitting complaints to the Company by its Clients, as well as the steps followed by the Company's personnel in managing such complaints.

3. DEFINITIONS

"Complaint" - AS/NZS 10002:2014 sets out the following definition of 'complaint' at p. 6: [An expression] of dissatisfaction made to or about an organization, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.

"Complainant" is defined as any person, natural or legal, who has read, agreed with and accepted all the terms and conditions contained in the Client Agreement (without modifications), has opened a trading account with the Company and has lodged a complaint.

4. COMPLAINT HANDLING PROCEDURE

The Company considers communication to constitute a complaint when the complainant has completed the relevant Complaint Form, attached hereto as Appendix A, and submitted it to the Company through one of the following channels:

- a. By email to complaints@oneprime.au or support@oneprime.au
- b. By completing the relevant form available on the "Contact Us" page of the Company's website.

If the Company receives a communication through its established complaint channels that does not meet the above definition of a "complaint" and can be classified as an enquiry, it will be treated as such and referred to the appropriate department for handling. The complainant retains the right to request that their enquiry be reclassified as a complaint.

This Policy applies to all registered clients holding trading accounts with the Company.

Royal Financial' complaints handling procedure must be either publicly available or readily accessible and free of charge to

complainants. The Complaints Specialist(s), and where necessary the Compliance Department, shall handle any complaint submitted by a complainant in an efficient and timely manner. If a complaint is made against the Compliance Department itself, it shall be addressed by a member of Senior Management.

4.1 Procedure for Handling Verbal Complaints

It is the Company's policy not to accept verbal complaints or grievances. If any employee of the Company, regardless of department, receives a verbal complaint or grievance, the following procedure must be followed:

- 4.1.1 The employee receiving the verbal complaint or grievance shall take all necessary steps to ensure the matter is properly addressed. The employee must inform the complainant that all complaints or grievances must be submitted in writing by completing the Complaint Form (attached as Appendix A) and sending it via email to complaints@oneprime.au. Once the complainant submits the Complaint Form, the procedure for written complaints, as outlined in paragraph 4.2, shall apply.
- 4.1.2 If the complainant submits the Complaint Form to their Sales Agent or Account Manager, the complaint or grievance, as received, must be forwarded to complaints@oneprime.au within the same working day.
- 4.1.3 A member of the Support Department shall inform the complainant that their complaint or grievance has been forwarded to complaints@oneprime.au, providing all necessary details so the complainant is aware of who is handling their case.
- 4.1.4 In addition, the member of staff should make every effort to resolve the issue immediately if the nature of the complaint or grievance allows, so that the client need not proceed with a formal written complaint. However, in doing so, the staff member must not:
 - Make any commitments on behalf of the Company,
 - Address matters related to best execution,
 - Address issues involving legal matters,
 - Commit the Company to any action before the issue has been formally examined.

4.2 Procedure for Handling Written Complaints

When a written complaint is received as described in Paragraph 3, the Company shall follow the procedure outlined below:

- 4.2.1 If a complaint is not received in accordance with Paragraph 3 (e.g., received via internal channels such as chat, client correspondence, personal Oneroyal email, or through a Back Office employee, Sales Agent, Account Manager, or any other Oneroyal staff member), it must be forwarded in its original form to complaints@oneroyal.au within the same working day.
- 4.2.2 Upon receiving a written complaint, a member of the Support Department shall send an acknowledgment of receipt to the complainant's registered email address within five (5) working days. This email will confirm receipt and request that the complainant complete the Complaint Form (attached as Appendix A) if not already done.
- 4.2.3 Once the Complaint Form is completed and submitted, a member of the Support Department will review the details. If, based on the information provided, the matter does not fall within the definition of a "complaint," it will be classified as an enquiry and referred to the appropriate department.

4.2.4 If the matter qualifies as a complaint, the Head of the Support Department, or a designated Support team member, will record it in the internal complaints register and assign a unique reference number. This reference number will be communicated to the complainant within five (5) working days.

4.2.5 The complainant will be informed of:

- The unique reference number, which must be used in all future communications regarding the complaint,
- The complaint handling process,
- The contact details of the person responsible for department,
- The indicative resolution timeframe (15 working days),
- Confirmation that the complaint handling procedure is free of charge.

4.2.6 The following information will be collected and recorded:

- Complainant's full name and surname,
- Trading account number,
- Affected transactions (if applicable),
- Date and description of the issue,
- Company service related to the complaint,
- Name of the employee responsible for providing the service,
- The employee's department,
- Content of the complaint,
- Capital and value of the financial instruments concerned,
- The damage claimed,
- Any related correspondence between the Company and the complainant.

4.2.7 The Company will thoroughly review:

- Information provided by the complainant,
- Information provided by the relevant employee (if applicable),
- Data retrieved from Company records (e.g., transaction history, correspondence, recorded calls, IT data),
- Events leading to the complaint.

4.2.8 If the complainant fails to submit the Complaint Form or provides the information listed in 4.2.6, the Company will request the missing details. A Company official may also contact the complainant for clarification or additional information. The complainant's cooperation is essential for the complaint to be processed.

- a. Once the complaint is examined, the Company will communicate its decision in writing, using clear and plain language. The response will include the reasoning behind the decision and any corrective actions to be taken.

- 4.2.9 The Company will aim to resolve the complaint within 15 working days. If further investigation is required, the complaint may be escalated to Senior Management, who will coordinate with relevant departments as needed. This may extend the resolution time.
- 4.2.10 If the Company is unable to provide a final response within the specified timeframe, the complainant will be informed of the delay, its reasons, and the expected completion date. In any case, a final response will be provided no later than two months from the complaint's submission.
- 4.2.11 Upon closure, the Head of the Support Department will ensure an electronic record is kept detailing:
- Actions taken,
 - Information and evidence gathered,
 - Measures implemented for resolution,
 - Any conflicts of interest identified,
 - The outcome and rationale for the decision.
- 4.2.12 Additionally, the Head of the Support Department will:
- a. Regularly analyze complaint data to identify root causes, systemic issues, and potential risks. Relevant personnel will be informed, and corrective actions taken where necessary.
 - b. Submit reports twice a year to ASIC on internal dispute resolution (IDR) data.
- 4.2.13 The Complaints Handling Policy will be published on the Company's official website.
- 4.2.14 The Complaints Handling Policy will always be accessible to all Company personnel via email and internal communication channels, without restriction.

5. RECORD KEEPING OF COMPLAINTS

The Company shall maintain records of all complaints for a minimum period of five (5) years following the closure of the client's trading account. The Support Department shall be responsible for ensuring proper record-keeping and storage of all complaint-related documentation.

APPENDIX A**COMPLAINT FORM****1. COMPLAINANT INFORMATION**

Full Name / Entity Name _____

Trading Account Number _____

Contact Person (if entity) _____

Phone Number _____

Postal Address _____

Email Address _____

2. COMPLAINT DETAILS

Date of Incident _____

Date of Submission _____

Type of Service Involved: OTC Derivatives Margin FX Other: _____

Details of Complaint

What outcome are you seeking?

3. SUPPORTING DOCUMENTATION

Please attach any relevant documents (e.g., correspondence, statements, transaction records) that may assist us in investigating your complaint.

4. DECLARATION

Name _____

Signature _____

Date _____

5. SUBMISSION INSTRUCTIONS

Please submit this form to: complaints@oneprime.au or support@oneprime.au

IMPORTANT NOTES

- This form is for use by wholesale clients as defined under the Corporations Act 2001 (Cth).
- The Company will acknowledge receipt of your complaint within 5 business days and aim to resolve it within the timeframe specified in our Complaints Handling Policy.