



● OFFICIAL DOCUMENT

INTERNATIONAL COMPLAINTS FRAMEWORK

Complaints Handling Policy

International Complaints Resolution Framework

DOCUMENT

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INTERNATIONAL ROUTE

RockGlobal International LLC

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RockGlobal International LLC is committed to handling complaints openly, diligently, fairly, and without unnecessary delay. We treat complaints as an opportunity to put matters right where appropriate, explain our decisions clearly, and improve our services and controls.

This policy explains how to raise a complaint, the information that helps us investigate, the stages of our review, the outcomes we may provide, and the options available if you remain dissatisfied. It should be read with the Client Agreement and other legal documents governing your international account.

Complaints handling at a glance

- You may complain free of charge by emailing **info@rockglobal.com** or through an official RockGlobal support channel.
- Clearly state that you are making a complaint and explain what happened, when it happened, and the outcome you seek.
- We will record the complaint, acknowledge it promptly, and ordinarily acknowledge it within two business days.
- A person with appropriate authority and, where practicable, no direct involvement in the matter will investigate it objectively.
- We aim to provide a final written response within 30 calendar days after receiving the complaint.
- If more time is reasonably required, we will explain why, describe the work still underway, and provide a revised response date.
- You may request an internal review if you remain dissatisfied with our final response.
- Making a complaint will not attract a fee or cause unfair treatment, retaliation, or avoidable restriction of your account.

1. Purpose and commitment

This policy establishes a clear and accessible process for receiving, investigating, resolving, recording, and learning from complaints concerning the international route operated by **RockGlobal International LLC**.

Our complaints-handling principles are:

- **accessibility:** a complaint may be made without legal language, a prescribed form, or payment;
- **fairness:** we consider relevant information objectively and give you a reasonable opportunity to explain your position;
- **diligence:** we investigate with appropriate care, competence, and attention to the circumstances;
- **transparency:** we explain the process, material findings, outcome, and available next steps in plain language;
- **timeliness:** we act promptly and keep you informed if a matter takes longer than expected;
- **confidentiality:** we limit access to complaint information to those who need it for review, response, oversight, or lawful reporting; and
- **continuous improvement:** we analyse complaints for recurring issues, control weaknesses, and opportunities to improve.

Nothing in this policy limits a mandatory right or remedy available under applicable law or changes the dispute-resolution provisions of the Client Agreement.

2. Responsible entity and scope

The entity responsible for this policy and the complaints process is:

RockGlobal International LLC

Company No. 3108 LLC 2023

2nd Floor, Reigate Building, P.O. Box 356

Kingstown, Saint Vincent and the Grenadines

References to **RG International**, **RockGlobal**, **RG**, **we**, **us**, and **our** in this policy mean RockGlobal International LLC.

References to **you** and **your** mean a current, former, or prospective international client, an authorised person, or another person directly affected by an international service.

This policy covers complaints concerning matters such as:

- account applications, verification, classification, restriction, suspension, or closure;
- deposits, withdrawals, fees, charges, rebates, adjustments, and account balances;
- trading-platform availability, account access, technical support, or communications;
- order handling, execution, pricing, spreads, slippage, stop-out, liquidation, or trade adjustments;
- staff, contractor, introducing-partner, or service-provider conduct connected with the international route;
- marketing, promotions, representations, disclosures, and information supplied by RG International;
- privacy, confidentiality, cybersecurity, fraud handling, or unauthorised account activity; and
- a decision, omission, delay, or service standard that causes dissatisfaction and for which you expect a response or resolution.

This policy does not itself determine whether a claim is valid, create a right to compensation, or override a contractual term. Each complaint is assessed on its facts, the available evidence, the applicable agreement, and relevant law.

3. What is a complaint?

A complaint is an expression of dissatisfaction about RG International's products, services, people, conduct, decisions, omissions, or complaints process where a response or resolution is explicitly or implicitly expected.

You do not need to use the word **complaint**. If a communication reasonably indicates dissatisfaction and seeks a response or remedy, we will treat it according to this policy.

A routine request for information, account assistance, or technical help is not usually a complaint unless you also express dissatisfaction or the underlying issue remains unresolved. If we initially treat your communication as a service request and it later becomes clear that it is a complaint, we will record it as a complaint from the date the dissatisfaction was first expressed.

4. Who may make a complaint?

A complaint may be made by:

- a current, former, or prospective international client;
- an authorised representative, attorney, executor, administrator, or guardian acting with appropriate authority;
- a joint account holder or authorised account user regarding a matter that affects them; or
- another person whose interests are directly affected by conduct connected with RG International.

If someone acts for you, we may request evidence of authority before disclosing confidential information or accepting instructions. We will still record the complaint when received and explain what is required to proceed.

We will consider anonymous complaints where enough information is available to investigate, although anonymity may limit our ability to verify facts, communicate an outcome, or provide a remedy.

5. How to make a complaint

Email is the preferred channel because it creates a clear record and allows supporting documents to be provided securely.

Email: info@rockglobal.com

Subject line: Formal Complaint

Postal address: RockGlobal International LLC, 2nd Floor, Reigate Building, P.O. Box 356, Kingstown, Saint Vincent and the Grenadines

You may also raise a complaint through an official RockGlobal support channel. Any employee or representative who receives a complaint must refer it into the formal complaints process. Where a complaint is made verbally, we may prepare a written summary and ask you to confirm that it accurately describes the matter.

For account security, send the complaint from your registered email address where possible. Never include a password, one-time code, full payment-card number, private cryptographic key, or other credential in a complaint.

6. Information to include

Providing the following information helps us investigate efficiently:

- your full name and registered email address;
- your trading account number, if applicable;
- a clear description of the issue and why you are dissatisfied;
- relevant dates, times, instruments, order or transaction numbers, and amounts;
- copies of relevant communications, screenshots, statements, or other supporting material;
- the names of any RG representative involved, if known; and
- the outcome or remedy you are seeking.

Do not delay making a complaint merely because some information is unavailable. Submit what you have and explain what is missing. We may ask focused follow-up questions or request documents reasonably required to complete the investigation.

You should preserve relevant records and, where the issue concerns a live account, continue to manage your positions, margin, security, and payment obligations. Making a complaint does not suspend market exposure, prevent liquidation, cancel an instruction, or pause obligations under the Client Agreement unless RG International confirms otherwise in writing.

7. Urgent trading, security, and payment matters

The complaints process is not an order-entry, emergency trading, fraud-reporting, or payment-cancellation channel. If a position is open, account security is at risk, or an instruction requires immediate operational attention, contact the appropriate support or trading channel first and take any reasonable steps available to protect your account.

Examples of urgent matters include suspected account compromise, unauthorised access, an inability to access the platform while positions are open, a mistaken payment instruction, or a request to cancel or amend an order where cancellation or amendment is still possible.

We may handle an urgent operational issue and the related complaint in parallel. Investigating a complaint does not guarantee that a trade, payment, transfer, restriction, or market outcome can be reversed.

8. Our complaints process

Stage	What we do	Service standard
Receipt and recording	Record the issue, date received, affected account or service, and the outcome sought	On receipt through an official channel
Acknowledgement	Confirm that the complaint has entered the formal process and provide a reference or responsible contact where available	Promptly and ordinarily within two business days
Assessment	Identify the issues, potential urgency, evidence required, conflicts of interest, and appropriate investigator	As soon as practicable after acknowledgement
Investigation	Review relevant records, system data, communications, contractual terms, and information from you and relevant personnel	Progressed diligently and proportionately to complexity
Outcome	Provide a reasoned written response, any remedy or corrective action, and the internal-review pathway	Targeted within 30 calendar days of receipt
Internal review	Reconsider the complaint through a senior person not materially involved in the original decision, where practicable	Promptly after a review request

These are service standards, not a waiver of any shorter period required by applicable law. A **business day** for this policy excludes Saturdays, Sundays, and public holidays in Saint Vincent and the Grenadines.

9. Acknowledgement and communication

Our acknowledgement will ordinarily:

- confirm that the complaint has been recorded;
- identify the issue as we understand it;
- provide a complaint reference or responsible contact where available;
- request any essential missing information; and
- explain the expected next step and target response period.

We will communicate through your registered contact details unless another secure and verified method is agreed. Keep those details current and monitor spam or junk folders while a complaint is open.

If a complaint can be resolved promptly to your satisfaction, we may combine the acknowledgement and outcome in one communication. We will still retain an appropriate record of the matter.

10. Investigation standards

The investigator will have appropriate authority and competence and, where practicable, will not have been directly responsible for the conduct under review. Any actual or potential conflict of interest must be identified and managed.

Depending on the complaint, the investigation may consider:

- account-opening, identity-verification, suitability, and classification records;
- platform, server, price-feed, order, execution, and system logs;
- deposit, withdrawal, reconciliation, and payment-provider records;
- call recordings, emails, chat messages, tickets, and internal notes;
- the Client Agreement, product specifications, policies, notices, and terms in force at the relevant time;
- information from employees, contractors, introducing partners, liquidity or technology providers, and other relevant service providers; and

- the chronology, financial effect, actions taken by each party, and outcome sought.

We assess evidence fairly and in context. Platform screenshots or client-side records can be useful, but may not by themselves establish server time, executable prices, market liquidity, receipt of an instruction, or the sequence of events. We will explain the records and reasoning that materially support our decision, subject to privacy, security, legal privilege, market-integrity, and third-party confidentiality constraints.

We may contact you for clarification. If requested information is not provided, we will ordinarily decide the complaint using the information reasonably available and explain any resulting limitation.

11. Delays and progress updates

We aim to issue a final written response within 30 calendar days after receiving a complaint. Some matters may reasonably take longer, including where they involve multiple accounts, extensive trading records, third-party information, suspected fraud, legal restrictions, exceptional market events, or complex technical reconstruction.

If we cannot complete the investigation within the target period, we will provide a written update that:

- explains the principal reason for the delay;
- identifies any information still required from you;
- describes the work that remains underway; and
- gives a revised date by which we expect to respond.

We will not use complexity or third-party involvement as a reason for avoidable delay. Where possible, we will resolve separable parts of a complaint while another part remains under investigation.

12. Final response and possible outcomes

Our final response will ordinarily:

- state the complaint issues considered;
- summarise the material facts and evidence;
- explain whether each issue is upheld, partially upheld, not upheld, or unable to be determined;
- give clear reasons for the decision;
- describe any remedy, correction, or further action; and
- explain how to request an internal review.

Depending on the circumstances and our legal or contractual obligations, an outcome may include an explanation, apology, correction of information, restoration of access, operational action, fee or account adjustment, payment, staff guidance, control improvement, or no further action. A remedy is not automatic and must be proportionate to the substantiated issue.

Any offer may be subject to clearly stated conditions and, where lawful, acceptance in full and final settlement of the matters identified. You should consider obtaining independent advice before accepting a settlement if you are uncertain about its effect.

13. Internal review

If you remain dissatisfied, reply to the final response and request an **internal review**. Explain which finding you dispute, why you believe it is incorrect, and provide any new or overlooked information.

Where practicable, the review will be conducted by a senior person who was not materially involved in the original decision. The reviewer may confirm, vary, or replace the decision, request further investigation, or propose another resolution.

An internal review is not intended to repeat the same investigation without a reason. We may close repeated correspondence that raises no new issue or evidence after giving a clear final position, while remaining willing to consider genuinely new information.

14. External avenues and jurisdictional position

RockGlobal International LLC is registered in Saint Vincent and the Grenadines. Company registration is not, by itself, a financial-services licence, regulatory endorsement, investor-compensation arrangement, or external dispute-resolution scheme for forex or CFD complaints.

RG International does not represent that an ombudsman or designated third-party complaints body is available for every complaint concerning the international route. If you remain dissatisfied after internal review, you may seek independent legal advice and consider any court, arbitration, law-enforcement, consumer, privacy, or other process that lawfully has jurisdiction over your matter. The dispute-resolution and governing-law provisions in the Client Agreement continue to apply.

Nothing in this policy prevents you from reporting suspected criminal conduct to an appropriate law-enforcement authority, exercising a mandatory legal right, or approaching a competent authority that has lawful jurisdiction. We cannot advise you which external body or remedy is appropriate for your circumstances.

15. Australia and New Zealand are separate routes

This policy does not govern complaints concerning services provided by RockGlobal's Australian or New Zealand entities.

- **Australia:** ROCKGLOBAL CAPITAL MARKETS PTY LTD, ABN 12 108 915 233, Australian Financial Services Licence No. 282 288.
- **New Zealand:** Rockfort Markets Limited, trading as RockGlobal, NZBN 9 429 042 010 807, FSP509 766.

If your account or service belongs to either entity, use that entity's dedicated website, legal documents, and complaints process. Rights, response periods, external dispute-resolution arrangements, and regulatory pathways may differ.

If you mistakenly send an Australian or New Zealand complaint to RG International, we may securely refer or forward it to the appropriate entity and tell you that we have done so. We will not decide a complaint for which RG International is not responsible.

16. Accessibility, language, and representatives

We will take reasonable steps to make the complaints process accessible. Tell us if you need a communication adjustment or assistance understanding the process. We may use translation or accessibility support where reasonably available, while the English version of contractual and complaint records may control where the governing documents say so.

You may appoint a representative at your own cost. We will communicate with the representative after verifying their authority, but may still contact you where reasonably necessary for identity, security, evidence, or settlement purposes.

17. Fair treatment and account management

Making a complaint is free of charge. We will not retaliate, discriminate, or treat you unfairly because you make a complaint in good faith, assist an investigation, or request an internal review.

We may continue taking legitimate action required by the Client Agreement, law, security controls, risk management, market conditions, or account status while a complaint is open. This may include requesting margin, restricting activity,

closing positions, correcting an error, conducting verification, preventing fraud, or recovering an amount properly due. Such action is not retaliation merely because it occurs during the complaints process.

Abusive, threatening, discriminatory, fraudulent, or deliberately obstructive conduct is not acceptable. We may set reasonable communication boundaries or use a single contact channel where necessary to protect people and maintain an effective review, without dismissing the underlying complaint solely because of how it was expressed.

18. Privacy, confidentiality, and records

We handle personal information connected with a complaint in accordance with the RockGlobal Privacy Policy and applicable law. Information may be accessed or shared within RG International and with relevant affiliates, professional advisers, insurers, banks, payment providers, technology providers, liquidity providers, auditors, investigators, authorities, or other service providers where reasonably necessary and lawful.

Complaint records may include correspondence, recordings, account and trading data, identity information, evidence, investigation notes, decisions, remedies, and follow-up actions. We retain records for the period reasonably necessary to resolve the matter, meet legal and contractual obligations, manage risk, establish or defend claims, and improve our controls.

We will not disclose privileged material, security-sensitive information, confidential information about another person, or third-party proprietary information where disclosure is not permitted. Where this limits the detail we can provide, we will explain the limitation where lawful and practicable.

19. Governance and continuous improvement

Legal and Compliance owns this policy. Complaints are subject to proportionate management oversight, recordkeeping, trend analysis, and escalation.

We may analyse complaints individually and collectively to identify:

- recurring service, execution, payment, platform, communication, or disclosure issues;
- vulnerable clients or circumstances requiring additional care;
- conduct, training, supervision, or resource concerns;
- weaknesses in products, systems, controls, agreements, or customer communications;
- issues involving a particular provider, partner, channel, market, or instrument; and
- corrective actions whose completion and effectiveness should be monitored.

Material issues may be escalated to senior management and may result in remediation, process or system changes, staff action, provider review, client communication, or lawful reporting.

20. Changes to this policy

We may update this policy to reflect changes in our services, organisation, legal obligations, operational experience, or complaints controls. The current version will be published with its effective and last-updated dates.

An update to this policy does not retrospectively remove a mandatory right or alter the contractual terms governing a complaint. Earlier versions are retained in our records and may be requested by email.

21. Contact RockGlobal International LLC

Address complaints and requests for internal review to **Legal and Compliance**.

RockGlobal International LLC

Company No. 3108 LLC 2023

2nd Floor, Reigate Building, P.O. Box 356

Kingstown, Saint Vincent and the Grenadines

Email: info@rockglobal.com

Use the subject line **Formal Complaint** and send the message from your registered email address where possible. Include enough information for us to identify the account, understand the issue, and respond securely.