PRIME DESK

MULTI-ASSET INSTITUTIONAL-GRADE BROKERAGE

Complaints Handling Policy

How to Complain, How We Investigate,
and What You Can Expect From Us

Company Registration Number 2026-00429
Saint Lucia International Business Company
Version 1.0 · Reference PD·LEG·08

FORMS PART OF THE CLIENT AGREEMENT

WWW.PRIME-DESK.COM

1 — Our Commitment

A complaint is information. We would rather receive it than not, and we treat the handling of complaints as a measure of the firm rather than as an administrative burden.

This Policy applies to every client, applicant, introducing broker, and partner. It forms part of the Client Agreement. The Company is not authorised by a Tier-1 regulator and is not subject to a statutory complaints regime; this Policy is adopted voluntarily and is enforceable as a term of that Agreement.

2 — What Counts as a Complaint

A complaint is any expression of dissatisfaction, whether justified or not, about the Company's services, conduct, execution, charges, staff, partners, or handling of your data or funds. You do not need to use the word "complaint", and you do not need to state a financial loss.

Is a complaint	Execution or slippage you believe was wrong · a delayed or declined withdrawal · an unexpected charge · a stop-out you dispute · conduct of a member of staff or a partner · handling of your personal data · a promotion not applied as described.
Is not a complaint	A general enquiry, a request for information, a password reset, or a request to change account settings. These are handled by support@prime-desk.com and are answered in the ordinary course.

3 — How to Complain

Write to **complaints@prime-desk.com** from the email address registered to your account. If you cannot use that address, tell us why and we will verify your identity another way.

PLEASE INCLUDE	WHY
Your full name and account number	To locate the account and verify you.
Date and time of the event	To retrieve the server records for the right moment.
Ticket or transaction numbers	To identify the exact trades or payments concerned.
What happened, in your own words	To understand the issue as you experienced it.
What outcome you are seeking	To know what would resolve the matter for you.
Any supporting material	Screenshots, statements, or correspondence.

Complaints may be submitted in **English, Arabic, or Kurdish**. Where a complaint is submitted in Arabic or Kurdish, our response is provided in the same language, and the English record governs in the event of any inconsistency.

4 — The Process

01 Acknowledge	02 Investigate	03 Respond	04 Escalate
2 BUSINESS DAYS	ONGOING	15 BUSINESS DAYS	10 BUSINESS DAYS
You receive a written acknowledgement with a unique reference number and the name of the person handling the matter.	Server logs, quote records, payment records, and correspondence are retrieved and reviewed against the relevant policy.	A written final response setting out our findings, the evidence relied on, the decision, and the reason for it.	If you are not satisfied, the matter is reviewed by the Chief Compliance Officer independently of the function complained of.

4.1 Where More Time Is Needed

Where a complaint is complex, requires information from a liquidity provider or payment provider, or concerns an extended period, we may extend the fifteen (15) business day period to a maximum of **thirty-five (35) business days**. We will tell you before the original period expires, explain why, and give you a date.

4.2 Independence of the Review

A complaint is never investigated by the person whose conduct or decision is complained of. A complaint concerning execution is reviewed by compliance rather than by the dealing function. A complaint concerning a partner is reviewed without the partner's involvement.

5 — Our Final Response

The final response is in writing and states: what we found; the evidence we relied on, including the relevant server records; whether the complaint is upheld, partly upheld, or not upheld; the reason for that conclusion; what we will do, including any correction, refund, or adjustment; and your right to escalate.

WHERE WE ARE AT FAULT

Where we find that we were wrong, we say so plainly, correct the position, and where a client suffered a quantifiable financial detriment as a direct result, we make it good. We do not require a client to accept a settlement as a condition of receiving an explanation.

6 — Escalation and External Recourse

6.1 Internal Escalation

If you are not satisfied with the final response, reply within **three (3) months** stating why. The Chief Compliance Officer will review the matter afresh and respond within ten (10) business days.

EXTERNAL RECOURSE — READ CAREFULLY

Because Prime Desk Ltd. is incorporated in Saint Lucia and is not authorised by a Tier-1 financial regulator, **there is no financial ombudsman, compensation scheme, or regulatory complaints body to which you may escalate a complaint about the Company.**

Where a complaint is not resolved through this Policy, the route available to you is that set out in the Client Agreement: good-faith negotiation, followed by binding arbitration seated in the Republic of Iraq or in Saint Lucia. Nothing in this Policy restricts any legal right you may otherwise have.

7 — Time Limits

A complaint should be raised within **six (6) months** of the event, or of the date you became aware of it. We may consider a complaint made later where there is good reason for the delay and the records remain available. Trading records are retained for not less than five (5) years.

8 — Cost and Conduct

Making a complaint is free and does not affect your ability to trade, withdraw, or use your account. We will not close or restrict an account because a complaint has been made. We ask that correspondence remains civil; abusive or threatening communication may be handled through a single nominated contact, but the complaint itself is still investigated and answered.

9 — Records and Learning

Register	Every complaint is recorded with its date, category, account, handler, outcome, and any remediation. The register is retained for not less than five (5) years.
Root cause	Complaints are categorised and reviewed for recurring causes. A recurring cause is treated as a defect in a process, not as a series of unrelated incidents.
Board reporting	Volumes, categories, outcomes, and themes are reported to the Board at least quarterly.
Partner and staff conduct	Complaints concerning a partner or employee are fed into the conduct review under the Conflicts of Interest Policy and the relevant agreement.

10 — Governance

This Policy is owned by the Chief Compliance Officer and reviewed at least annually. The current version is published at www.prime-desk.com. Material changes take effect not less than seven (7) days after publication.

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