



# 争议解决及投诉程序

版本:3.1

日期:2016年4月

STO 塞浦路斯

## Dispute Resolution & Complaints Procedure version 3.1, April 2016

This document is drafted by AFX Capital Market Ltd. (“AFX”, “we”, “us”, “our”) a company registered in Cyprus, authorised and regulated by the Cyprus Securities and Exchange Commission – CySEC with licence no. 119/10 and registration no.253014. This document implements and is compliant with the provisions of Directive DI144-2007-01 for the authorisation and operating conditions of CIFs (“the Directive”)

AFX Capital Markets Ltd. ( “AFX” , “we” , “us” , “our” ) trading as STO welcomes feedback of any kind and recognises that we will not get everything right all of the time. Should you have reason for concern, please do not hesitate to contact us. In assessing any concerns we will follow the CySEC principles of Treating Customers Fairly and the principle of doing what is right in the individual circumstances.

We will attempt to resolve your complaint by the following business day. If we are unable to do this or you remain dissatisfied, the details of your concern will be recorded (if raised by telephone) and passed to a compliance officer to be dealt with. If you are submitting your complaint by email, fax, letter or other form we ask you do so, on our complaints form.

This is designed to make sure we have all the information we require to log and investigate the complaint from an early stage. We will not refuse complaints raised without using the form, however, if insufficient information is provided we may not start our timeframes for responding causing delay.

### Contact us:

Our details are as follows:

#### Post:

AFX Capital Markets Ltd. Trading as STO 116,  
Gladstonos Street,  
M. Kyprianou House, 1st Floor,

## 争议解决及投诉程序 版本 3.1, 2016 年 4 月

此文件由 AFX 资本市场有限公司（以下简称“AFX”，“我们”，“我们”，“我们的”）起草，AFX 是注册在塞浦路斯，由塞浦路斯证券交易委员会授权和监管-Cysec 监管号 119/10，注册号 253104。本文件实现和符合规定的指令 di144 - 2007 - 01 CIFs 的授权和操作条件（“指令”）。

AFX Capital Markets Ltd.(又称为“AFX”，“我们”，“我们的”）——交易名为 STO 明白错误在所难免，因而欢迎任何形式的意见反馈。如果您有任何问题，请立刻联系我们。我们将在不同的情况中根据塞浦路斯平等对待客户的原则以及公正处事的原则来评估问题。

我们力图在下一个工作日解决您的投诉。如果我们未能做到这一点，或者您仍不满意，您的问题将被记录在案（如使用电话提出）并提交至合规负责人处理。如果您通过邮件、传真、信件或其他表格提交投诉，请使用我们的投诉表格。

这样做的目的是确保我们能获取所有必需信息以及早开始调查。我们不拒绝无表格投诉，但如果您提交的信息不足，我们可能无法及早处理和回复。

### 联系我们:

具体联系方式如下:

#### 邮编:

AFX Capital Markets Ltd. Trading as STO 116,  
Gladstonos Street,  
M. Kyprianou House, 1st Floor,

CY-3032,

Limassol, Cyprus

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

**Telephone:** +357 25262710; **By Fax:** +357 25 727442

**Website (Live Chat):** [www.stofs.com](http://www.stofs.com)

Please note that if a complaint refers to the actions of a compliance officer the complaint will be dealt with by another appropriate person – for example their manager or a director should this be necessary.

The compliance officer will acknowledge your concern within forty-eight (48) hours confirming the name and contact details of the person handling your concern, together with details of our complaints handling procedure. We may at this stage look to confirm our understanding of your complaint, if required.

We aim to investigate concerns as promptly as possible, however, if we are unable to produce a final response within four (4) weeks, we will write to explaining why we are not in a position to respond and will give an indication of when we hope to be in a position to respond. A final response must be provided within eight (8) weeks of the date the complaint was logged. We will treat all complaints as individual complaints

and will look to ensure we understand your concerns before responding. If we request further information from you for the purposes of investigating the complaint we will treat the complaint timeframe as on hold. Once the information is received this will reactivate the time, you will not be required to wait a full eight (8) weeks again unless this is information that should have been provided to log the complaint, for example for joint account holders the signature of both clients.

If we request further information and do not receive this, we will contact once more for this information. If it is not received following the chase up, the complaint will be closed. If we are able to respond to any of the complaint without the information we may attempt to do so, but we do

CY-3032,

Limassol, Cyprus

**邮箱:** [compliance@stofs.com](mailto:compliance@stofs.com)

**电话:** +357 25262710; **传真:** +357 25 727442

**网址 (即时聊天):** [www.stofs.com](http://www.stofs.com)

请注意，如果投诉涉及合规人员，该投诉将由其他适当人选负责——如有必要，例如其经理或主管。

合规人员将在四十八（48）小时内受理您的问题，并提供受理人员的姓名、联系方式以及投诉处理流程。如有必要，您可在此阶段要求我们确认是否已受理投诉。

我们竭力以最快的速度调查问题，但如果未能在四（4）周内给出最终答复，我们将书面解释原因并说明预计何时能给出答复。最终答复须在录入投诉的八（8）周内给出。我们将独立处理每一个投诉，并确保在回复之前已了解您的问题。

如果需要您提供进一步信息以供调查之用，投诉将被待定。获得所需信息后，我们将重启投诉处理程序。您无需重新等待八（8）周，除非该信息是用于录入投诉，例如联名账户中所有客户的签名。

如果我们要求您提供却未能收到信息，我们将再次联系您。如果仍未收到信息，投诉将被关闭。如果未收到相关信息也能解决部分问题，我们将尽力处理，但我们认为仅针对投诉的部分问题作出答复并不恰当，因此我们不保证一定会这样做。

not guarantee this as we may feel it is inappropriate to respond to only part of the complaint.

AFX Capital Markets Ltd. will inform the client that they may refer the complaint with a copy of the final response within a period of 6 months to the competent authorities for further investigation if deemed to be appropriate, if deemed to be appropriate or where AFX Capital Markets Ltd has failed to respond within eight (8) weeks of the complaint being logged. Should you be unhappy with our response you can request CySEC look into the details on your behalf. The scheme has rules to who can complaint to it regarding the products we provide. Should you require further information its details are:

Complaints Desk

Cyprus Securities and Exchange Commission 27 Diagorou Street

CY-1097 Nicosia General: +357 22506600

Fax: +357 22754671

Email: [complaints@cysec.gov.cy](mailto:complaints@cysec.gov.cy) Website:

[http://www.cysec.gov.cy/complaints\\_cifs\\_regulate\\_d\\_gr.aspx](http://www.cysec.gov.cy/complaints_cifs_regulate_d_gr.aspx) (Greek)

or

[http://www.cysec.gov.cy/complaints\\_cifs\\_regulate\\_d\\_en.aspx](http://www.cysec.gov.cy/complaints_cifs_regulate_d_en.aspx) (English)

AFX reviews and monitors this document in an on-going basis having regard to the present Directive and relevant Circulars provided by CySEC.

如果情况适当或 AFX Capital Markets Ltd 未能在记录投诉后八（8）周内给出答复，AFX Capital Markets Ltd. 将通知客户他们可在 6 个月内携带最终答复文件至主管部门做进一步调查。若您不满意我们的答复，您可要求 CySEC 为您调查。对我们的产品投诉可按规定投诉至监管机构。具体信息如下：

投诉平台

塞浦路斯证券交易委员会 27 Diagorou Street

CY-1097 Nicosia General: +357 22506600

传真: +357 22754671

邮箱: [complaints@cysec.gov.cy](mailto:complaints@cysec.gov.cy) 网址:

[http://www.cysec.gov.cy/complaints\\_cifs\\_regulate\\_d\\_gr.aspx](http://www.cysec.gov.cy/complaints_cifs_regulate_d_gr.aspx) (希腊语)

或

[http://www.cysec.gov.cy/complaints\\_cifs\\_regulate\\_d\\_en.aspx](http://www.cysec.gov.cy/complaints_cifs_regulate_d_en.aspx) (英语)

考虑到当前由 CYSEC 提供的指导和相关通告，AFX 会持续地审查及监视此文件。

### Appendix 1: Complaint Form

### 附录 1: 投诉表格

REFERENCE AFX-2016-000\_

参考号 (内部使用) AFX-2016-000\_

(this is for internal use)

Complaint Date:

投诉日期:

Complainant

投诉人全称:

full name:

身份证明:

Identification:

投诉人邮箱:

Complainant

Email:

投诉人国家:

Complainant

Country:

Complaint Cause: Choose one of the following:

投诉原因: 选择以下其中之一:

(please highlight) - Execution of orders (e.g. delay in execution,

(请标示) - 订单执行 (例如, 延迟, 重复报价, 滑点, 错误交易等等)

trades etc.) Re-quotes, slippage, erroneous

- 提供给客户无质量的信息

provided to the - Quality of lack of information

- 合同条款/费用/手续费 (包括如今问题, 收益删除)

(including

the client

- 行政管理/客户服务 (包括监管, 安全防护服务)

of profits)

- Terms of contract/ fees/ charges

- 未经授权提供或者实施的商业活动

service

withdrawal problems, cancelation

- 其他 (请在下方注明详细信息)

services)

- General administrative/ customer

offered or carried

(including custody, safekeeping

- Unauthorised business being

out)

- Other (please specify below)

投诉原因评价:

Complaint Cause

Comments:

金融工具: - 外汇

Financial

- CFDs

Instruments:

- FOREX

- 其他 (请在下方注明详细信息)

- CFDs

- Other (please specify below)

金融工具注解:

Financial Instrum.

Comments:

Dispute Ammount:

争议金额:

Settlement Date:

结算日期:

**Record Type  
(NEW/UPDATED)**

Please provide as much detail as possible, including where available –dates, times, names or staff, numbers dialed, messages received or any information you consider relevant. If you refer to any documents or evidence that is not available to AFX Capital Markets Ltd. , please also provide of copies of such information

Please note if the account is in joint names the complaint must be signed by both clients

记录类型：  
(新/已更新的)

请尽量提供详细信息，包括可用的日期,时间,姓名或员工,电话,接收到的消息或任何你认为相关的信息。如果涉及任何文件或证据 AFX 资本市场有限公司无法使用,还请提供此类信息的副本。

请注意如果是联名账户，投诉人需要同时提供两位客户的签名。