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## Refunds / Withdrawals / Cancellations

While the highest attention should be paid to all Finance Department processes, there is a particular emphasis on this with regards to client withdrawals. All withdrawal requests must be received by filling in correctly the “Funds Withdrawal Application Request” on the Company’s website, which is sent to the Finance Department. Firstly, a client’s account must be validated before any withdrawal is processed, no matter how small the amount. If the client’s account has not been validated then the withdrawal request is cancelled and an email notification sent to the client advising them of this.

Before proceeding any further, the client’s account balance should be checked to ensure that there is sufficient free balance (or free margin if the client has open positions) in the client’s account equal to or below the amount of withdrawal in order to allow the withdrawal. If there is insufficient balance or free margin then the withdrawal request is cancelled and an email notification sent to the client advising them of this.

It is very important to note that it is the Company’s policy to only process withdrawals back to the source of the deposit, therefore any withdrawal requests made in a payment method that differs from the deposit payment method are not permitted. In cases such as these an email needs to be sent to the client advising them of this and requesting that they submit a new withdrawal request with the relevant information for their account.

In the case where the client has deposited using more than one credit/debit card, we must first return the funds to those credit/debit cards that the client used most recently in order to minimize the risk of chargebacks. Also, in the scenario where the client has deposited using more than one payment method, we must first return all of the originally deposited funds in equal amounts to those that make up the total deposited amount by each specific payment method. This is particularly the case where credit/debit card is one of the deposit methods.

For example, a client deposits USD 5,000 via credit card and USD 1,000 via bank wire. A request to withdraw USD 5,000 via bank wire would be declined, and the client advised that either this amount can be sent in full back to the credit card used to deposit, or split as USD 1,000 via Bank Wire and USD 4,000 via credit card. Once a client has withdrawn all of their invested funds they may then withdraw to either of the payment methods that they have used to deposit (credit/debit card or bank wire) with the choice being theirs at this point. In the case of withdrawals to the client’s credit/debit card, if the card issuer is not part of the CFT program (Card Funds Transfer), then withdrawals via this method may be limited by the card issuer up to the total amount of the client’s total deposits. The client must be instructed to contact their card issuer for clarification regarding this. If this was the case in this particular example then any withdrawals over and above the total deposited amount would be sent via Bank wire.

Note that if the client has deposited only by credit card and their card issuer is not part of the CFT program (Card Funds Transfer) then Bank Wire is the preferred method of withdrawal if the client has already withdrawn all of their invested funds.

In cases where a client has deposited using multiple payment methods that do not include credit card, then the Finance Department should refer to Compliance for final approval.

If a client is concerned regarding withdrawals to their card if they have had a new card issued (either because it has been lost/stolen or simply expired), it should be noted that withdrawals will not be restricted as long as the account that the card has been linked to has not been cancelled. The credit would only be declined if there had been no new card issued or the account has been closed.

The processing time for a withdrawal should not exceed 24 hours after receipt of the client request. Any withdrawal requests received outside of the Finance Department working hours should be processed before the close of business on the next available working day.

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When processing the withdrawal, the Finance Department should first process the withdrawal in the platform prior to initiating the payment. This is to ensure that the client does not open any trades in the interim that are dependent on the free margin provided by his balance before the withdrawal.

Finance Department should complete the relevant 'Client Withdrawal Requests' spread sheet while processing the withdrawal. The spread sheet acts not only as a record of the transaction, but is also a checklist of the required checks & actions that must be carried out when making reconciliations.

Finally, once the platform has been updated and the withdrawal processed, the client should be informed.

## **Third Party Deposits**

Any deposits made by clients must be made from a bank/payment provider account in the name of the Company's Account holder ONLY. Business accounts are not acceptable methods of deposits for individual retail clients. The only instance that a business account is an acceptable form of deposit is for a corporate account client and the account name must exactly match the company name that we have on record. Any third party payments that are received via any method must be returned to the remitting account immediately.

## **Refunds / Reversals**

Any third party deposits that have already been deposited must be refunded in the platform followed by the relevant payment method.

In the case where a client's account has been blocked and the deposits refunded, but there is still a profit amount showing in the account, the appropriate steps must be taken in order to correct this. This is due to the fact that the profits are considered invalid as they have been made on the basis of fraudulent deposits. These invalid profits should be removed from the system.