



Interactive Brokers Central Europe Zrt.  
(IBCE)

# COMPLAINTS HANDLING POLICY

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## 1 PURPOSE

The purpose of IBCE's ("Company") COMPLAINTS HANDLING POLICY ("Policy") is to establish the key principles and concepts of an effective and efficient management of complaints handling as well as the minimum standards in accordance with applicable laws and regulations.

This Policy ensures that IBCE is committed to fair, effective complaints handling, irrespective of the nature of the complaints, and handles client or potential client complaints in a transparent manner, providing consistent outcomes and also protecting privacy.

This Policy is designed to supplement and operationalize certain legal and regulatory requirements applicable to complaints handling by IBCE and does not supersede, replace, or modify any such legal and regulatory requirements.

## 2 LEGAL / REGULATORY REFERENCE

The key legal regulatory framework and requirements used for this Policy are as follows:

- Commission Delegated Regulation (EU) 2017/565 of 25 April 2016 supplementing Directive 2014/65/EU of the European Parliament and of the Council as regards organisational requirements and operating conditions for investment firms and defined terms for the purposes of that Directive (Delegated Regulation)
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)
- Act CXXXVIII of 2007 on Investment Firms and Commodity Dealers, and on Regulations Governing their Activities (Bszt.)
- Act CXII of 2011 on the Right of Informational Self-Determination and on the Freedom of Information
- Government Decree 435/2016 (XII. 16.) on rules and procedures for the complaint handling of payment institutions, electronic money issuing institutions, voucher issuers, financial institutions and independent financial intermediaries
- MNB Decree 66/2021. (XII. 20.) laying down detailed rules concerning the form and manner in which complaints are to be dealt with by financial institutions
- MNB Recommendation 16/2021 (XI. 16.) on the complaint handling procedures for financial institutions.

## 3 SCOPE

The abbreviations used in this Policy to identify Departments of IBCE are the same as the abbreviations used in the Organizational and Operational Charter (OOC or SZMSZ).

### 3.1 PERSONAL SCOPE

This Policy applies to all employees of IBCE without limitation and to all service providers and affiliates of Interactive Brokers Group (IBG) acting for or on behalf of IBCE (hereafter the "affiliates") and all activities undertaken by IBCE.

It is the responsibility of each affected department manager within IBCE to ensure that this Policy is known and conformed to within his/her respective area of responsibility.

### 3.2 MATERIAL SCOPE

The scope of the Policy extends to complaints handling processes and procedures of IBCE.

## 4 KEY DEFINITIONS

TERMS	DEFINITIONS
CCO	Chief Compliance Officer
CEO	Chief Executive Officer
FAB	Financial Arbitration Board
IBCE	Interactive Brokers Central Europe Zrt.
IBG	Interactive Brokers Group
MNB	Magyar Nemzeti Bank (Central Bank of Hungary)

## 5 KEY PRINCIPLES

The Company shall make every effort to ensure that in the course of providing its services, no situation that may give rise to complaints arise in its customer relations. If it does eventuate, the Company is committed to resolving its customers' complaints to the best of its professional ability, with total commitment, efficiently and promptly, in the best interest of its customers. The Company will make every effort to act in a way that is proportionate to the circumstances in order to avoid a consumer financial dispute.

When lodging a complaint, Clients may express any complaints or dissatisfaction they may have in relation to the investment services they have received.

The Company shall be cooperative and flexible in the handling of complaints and shall ensure that the problems and objections raised in the complaints are investigated and shall collect and examine all relevant evidence relating to the complaint.

IBCE provides its customers with the most appropriate channels to submit complaints and comments according to its business model.

The internal procedures for the effective and legally compliant handling of complaints must be followed and adhered to by all staff involved in the handling of complaints, taking into account the best interests of the complainants.

The Company shall not charge the Customer any extra fee for lodging a complaint and for the investigation thereof.

In the event of and after the rejection of the complaint, the Customer may contact the MNB's Financial Consumer Protection Centre initiate consumer protection proceedings, and in the event of a dispute concerning the contract either the MNB Financial Arbitration Board operated by the MNB or to a court.

Based on Regulation (EU) No 524/2013 of the European Parliament and of the Council of 21 May 2013 on online dispute resolution for consumer disputes ('Regulation'), the European Commission has established an online dispute resolution platform to provide out-of-court communication for the settlement of disputes between consumers residing in the European Union and service providers established in the European Union arising from contracts for online services.

Compliance, as part of the 2LOD, monitors the complaints handling process, and in the context of investor protection and control function, considers complaints as a key source of information that should be used to continuously improve processes and operations.

IBCE's management receives regular, but at least annual reports on the handling of complaints and any corrective action taken, if any.

## 6 ENFORCEMENT

All affected employees of IBCE are responsible for complying with this Policy. IBCE Management is responsible for ensuring adherence to this Policy and for taking appropriate action for employees that do not comply with this Policy requirements. Non-compliance is a breach of the terms of employment and may lead to disciplinary actions, which may include termination of employment, or third-party agreement. Exceptions to this Policy may be authorised by the CEO. All requests for exceptions to this Policy are documented, with the reason for the exceptions clearly identified. Questions regarding the interpretation of this Policy are directed to the CCO and to the CEO.