



BLACK PEARL SECURITIES LIMITED COMPLAINTS HANDLING PROCEDURE

Entity: Black Pearl Securities Limited (Trading as BP Prime) | FRN: 688456 | Company No: 08823678

Registered Office: 28 King Street, London, EC2V 8EH, United Kingdom

Regulatory Framework: FCA Dispute Resolution: Complaints Sourcebook (DISP 1.2) & FCA Consumer Duty (PRIN 2A)

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1. Introduction and Purpose

Black Pearl Securities Limited ('BP Prime', 'the Firm', 'we', 'us') is committed to delivering fair customer outcomes, high operational standards, and transparent trading execution across all services. We recognise, however, that dissatisfaction or operational queries may occasionally arise.

This document outlines our formal complaints handling procedure pursuant to the Financial Conduct Authority (FCA) Dispute Resolution: Complaints Sourcebook (DISP 1.2) and the FCA Consumer Duty (PRIN 2A). It sets out how expressions of dissatisfaction can be raised, how they are investigated independently, the statutory timeframes governing our responses, and the escalation rights available to eligible complainants through the Financial Ombudsman Service (FOS).

2. Regulatory Definition of a Complaint

In accordance with the FCA Handbook Glossary and DISP rules, a complaint is defined as:

"Any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of, an eligible person about the provision of, or failure to provide, a financial service or product by the firm, which alleges that the complainant has suffered (or may suffer) financial loss, material distress, or material inconvenience."

3. How to Submit a Complaint

Registering a complaint with BP Prime is entirely free of charge. Complaints may be submitted via any of the following communication channels:

- Email: compliance@bpprime.com or support@bpprime.com
- Telephone: +44 (0) 20 3745 7101
- Postal Address: Compliance Department, Black Pearl Securities Limited, 28 King Street, London, EC2V 8EH, United Kingdom

To assist us in reviewing and investigating your matter promptly, please include:

1. Your full legal name and BP Prime trading account login ID;
2. A detailed factual description of the issue or dispute;
3. Specific trade ticket numbers, platform timestamps (MT4, MT5, or FIX API), and affected currency pairs or instruments;
4. Any supporting documentary evidence (such as order confirmations, screenshots, or email correspondence); and
5. Your expected outcome or preferred remediating action.

4. Investigation Process and Statutory Timelines (FCA DISP)

All complaints are reviewed impartially, competently, and diligently by personnel within our Compliance Department who are independent of the underlying subject matter. Investigations incorporate server execution logs, tick-by-tick liquidity feeds, bridge timestamps, call recordings, and written communications.

Stage	Statutory Timeframe	Procedure & Written Communication
Stage 1: Early Resolution	Close of 3rd business day	Where a complaint is resolved to the client's satisfaction within three business days of receipt, we issue a formal Summary Resolution Communication (SRC) outlining the resolution and confirming the client's statutory right to refer the matter to the Financial Ombudsman Service.
Stage 2: Formal Acknowledgement	Within 5 business days	If the matter cannot be resolved within three business days, a written acknowledgement is sent confirming receipt, providing the contact details of the appointed compliance officer, and enclosing a copy of this procedure.
Stage 3: Comprehensive Investigation	Ongoing	The Compliance Department gathers system logs, analyses trade latency, examines market pricing differentials, and requests additional technical evidence where required.
Stage 4: Final Response / Holding Letter	No later than 8 weeks	A comprehensive Final Response Letter (FRL) is issued detailing the findings, decision (upheld, partially upheld, or rejected), and any redress offered. If exceptional complexity delays the outcome, an 8-week holding letter is sent explaining the delay and notifying the client of immediate FOS escalation rights.

5. Referral to the Financial Ombudsman Service (FOS)

If you qualify as an eligible complainant (including consumers, micro-enterprises, and small businesses under FCA DISP 2.7) and remain dissatisfied with our Final Response Letter or Summary Resolution Communication, or if eight weeks have elapsed without a final response, you have the right to refer your complaint to the Financial Ombudsman Service free of charge.

- **Six-Month Referral Window:** You must refer your complaint to the Financial Ombudsman Service within six months of the date of our Final Response Letter or Summary Resolution Communication.
- **Independent Adjudication:** The Ombudsman provides an independent statutory dispute-resolution service for financial consumers.

Financial Ombudsman Service Contact Details:

- **Address:** The Financial Ombudsman Service, Exchange Tower, London, E14 9SR
- **Telephone:** 0800 023 4567 / +44 (0) 20 7964 0500
- **Email:** complaint.info@financial-ombudsman.org.uk
- **Website:** www.financial-ombudsman.org.uk

6. Governance, Root Cause Analysis and Record Keeping (DISP 1.9)



In accordance with FCA DISP 1.9 and Senior Management Arrangements, Systems and Controls (SYSC), BP Prime records and monitors all complaints centrally. The Compliance Oversight Officer (SMF16) and the Board of Directors review complaints data quarterly to conduct root cause analysis, identify operational weaknesses or systemic technical patterns, and implement remediation to uphold the Consumer Duty.

All complaint records, investigation logs, and related communications are retained for a minimum statutory period of five years following the date of resolution.