

## **REFUND AND WITHDRAWAL POLICY**

For the purposes of refund policy clarification Delwyn Trading has implemented a transparent return policy:

As soon as withdrawal instruction / Payment Order Instruction is received from the client through their e-mail address approved by the Company, the Company will ensure that the withdrawal request by the client includes all necessary information and the following checks must be performed:

- a) Confirm that the account number, name and banking details of the client agree with the details provided in the account opening application process.
- b) The client is eligible to withdrawal according to company policy
- c) Withdraw the funds from the client's account.
- d) Prepare the transfer request for the bank, or any other approved by the Company payment provider and forward to the Account's departments.
- e) Send the payment instruction to the relevant Bank or any other approved by the Company payment provider for payment.

Upon the company receiving an instruction from the Client to withdraw funds from the Client Account, the Client's funds will be processed within 2-3 business days, if the following requirements are met (notwithstanding the provisions of this article the actual receipt of funds depends on the Client's payment method):

- a) the instruction is to make a bank transfer of funds to the account of the Client;
- b) at the moment of payment, the Client's Free Margin exceeds the amount specified in the withdrawal instruction;
- c) Corresponding withdrawals will take up to 10 business days to reach your credit card or bank account

A refund request can be made in cases in which the account had been deposited into. In this case, the same method of payment used for the deposit will be used for the refund. The refund will be for the full amount, unless other arrangements have been made and will be processed only when client provides the required compliance documents as per company policy and AML policy.

The withdrawal process at Delwyn Trading as detailed above is structured around strict guidelines to make sure that funds are securely sent back to their originating source and beneficiary.

Clients' requests will be forwarded immediately to the Back Office Department for approval in terms of funds availability after they have discussed the request with the client and have

confirmed it. Once the Customer Support Department approves the request, they shall then forward it to the Finance and Accounting Department for processing.

Our Accounts department confirms the account balance, verifies that there are no holds or withdrawal restrictions on the account (that part has to check also by the Brokerage Department. The Brokerage Department has to check if there are no restrictions to proceed with the withdrawal such as if the client has open positions it is not advised to withdraw and if the client is on margin the withdrawal cannot be proceeded), and then approves the withdrawal request, pending compliance approval.

Delwyn Trading Accounts and Compliance department reviews all withdrawal requests, verifying the original funds are withdrawn via the same method of deposit and to the account holder on file. Our accounts department examines the withdrawal request against the customer's deposit history to make sure there is no suspicious activity, and verifies the bank account on file.

The Company reserves the right to decline a withdrawal request of the client asking for a specific transfer method and the Company has the right to suggest an alternative.

Withdrawals will only be effected towards the client. The Company will not to effect withdrawals to any other third party or anonymous account.

The Company reserves the right to request additional information and/ or documentation to satisfy itself that the request is legitimate. In addition, the Company reserves the right to reject such a request if it deems that this may not be legitimate. The client accepts that under such circumstances there may be a delay in processing the request.

As soon as the withdrawal requests are approved, the accounts department processes them and the funds are released to the client.

Note: In case of card withdrawals, Delwyn Trading refunds the amount you deposited through that card, if there are any profits, they are wire transferred to your accounts. This is done to be in compliance with AML/CFT Act 2009. (The withdrawal through the credit card can be proceeded only if the time between deposit and withdrawal doesn't exceed the time requested by the credit card provider most of the time is one year. In the case if the time between deposit and withdrawal exceeded the period requested by the credit card provider the funds will be return to the client through the wire, after receiving from the client all necessary documents requested by the Back Office and Compliance departments.)

Statement: Delwyn Trading will not be held liable regarding the cardholder's responsibilities regarding the laws of their jurisdiction. Users have to verify the laws in their own jurisdictions.

