

Alantra Capital Markets

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REFUND POLICY

1. GENERAL PROVISIONS

1.1. This Policy establishes the conditions and procedures for refunding funds to clients of Alantra Capital Markets (hereinafter - the "Company").

1.2. The policy is designed to ensure transparency and fairness when considering refund requests.

1.3. All refunds are made in accordance with applicable law and the Company's internal procedures.

2. CONDITIONS FOR REFUND

The right to refund arises in the following cases:

- Request submitted within 14 calendar days from the moment of account funding
- Funds have not been used for trading operations
- There are no open positions in the trading account
- Client has passed identification procedures
- AML/KYC policy requirements are met

2.1. Exceptions:

Refunds are not made in the following cases:

- More than 14 days have passed since funding
- Funds have been used for trading (even partially)
- There are suspicions of fraudulent activity
- Client Agreement conditions are violated
- Request submitted on behalf of a third party

3. REFUND REQUEST PROCEDURE

3.1. Required Documents:

Document	Purpose	Required
Refund request	Official refund request	Required
Identity document	Applicant identity verification	Required
Bank details	For funds transfer	Required
Reason justification	Explanation of refund necessity	If necessary

3.2. Request Submission Methods:

- Through personal account on the website
- By email to support@alantracapitalmarkets.com
- Through client support service

4. REVIEW AND REFUND TIMEFRAMES

Stage	Timeframe	Description
Receipt confirmation	1 business day	Request receipt notification
Request review	Up to 30 calendar days	Document and condition verification
Decision making	Within review period	Approval or denial
Funds transfer	Up to 10 business days	After request approval

5. REFUND METHODS

5.1. Funds are refunded using the same method used for funding:

5.1.1. Bank Transfers:

- Refund to the same bank account
- Bank transfer fees may apply
- Processing time: 3-5 business days

5.1.2. Bank Cards:

- Refund to the card used for funding
- Processing time: 3-10 business days
- Appears in statement as payment refund

5.1.3. Cryptocurrencies:

- Refund to the source wallet
- Blockchain network fees paid by client
- Processing time: depending on network (usually up to 24 hours)

6. COMMISSIONS AND EXPENSES

6.1. The following commissions may be charged for refunds:

Commission Type	Amount	Paid By
Request processing	\$50 or 3%	Client
Bank commissions	According to bank rates	Client
Crypto-network commissions	According to network rates	Client
Currency conversion	At rate on operation date	Client

7. GROUNDS FOR DENIAL

7.1. The Company may refuse to refund funds on the following grounds:

- Violation of established request submission deadlines
- Use of funds for trading operations
- Provision of false information
- Non-compliance with AML/KYC requirements
- Suspicions of fraudulent activity
- Technical errors in recipient details
- Client withdrawal of request

7.2. In case of refund denial, the Company sends a reasoned response indicating the reasons.

8. APPEALS PROCESS

8.1. Clients have the right to appeal a decision to deny a refund.

8.2. Appeals are submitted in writing with additional documents and justifications attached.

8.3. The appeal review period is 30 calendar days.

9. CONTACT INFORMATION

For refund questions, please contact:

- **Email:** support@alantracapitalmarkets.com
- **Phone:** +34 601 134 241
- **Business hours:** Mon-Fri 9:00 AM to 6:00 PM (GMT)