



COMPLAINT PROCEDURE

General

The Company has to maintain an effective and transparent procedure for handling of complaint and grievances from clients. The Company keeps records of each complaint or grievance including measure taken for its resolving. All complaints shall be treated confidentially.

Scope

The Company considers as a complaint a statement unsatisfactory of services provided, based on actual or supposed circumstances that have caused hardship or harm to its' originator, received in writing on a specified form provided by the Company.

Head of Back Office shall deal with clients' complaints unless the cases when a conflict of interest might occur. In such cases the Compliance officer shall deal with them.

Procedure

All complaints or grievances shall be in writing on the **Complaint Form** and addressed to Company's contact detail as stated on the said form.

The Company acknowledges receiving of the submitted form noting the approximate time for resolving the case as follows:

Initial Response will be given within 5 working days. In case when due to the nature of the complaint/grievance, more

time is required, Head of Back Office informs the Compliance Officer, who should fully investigate the complaint/

grievance in coordination with the head of involved department.

In cases where the complainant gives a response, a Further Acknowledgement will be proposed in next 5 working days;

A Final Resolution to be announced not later than 4 weeks of the date of initial complaint submitting.

If no response has been received from the complainant within 4 weeks from announcing of the Final Resolution, the Complaint will be considered resolved.

Records and Reports

The Company shall keep detailed documentation of all complaints and grievances.

The client shall receive a full copy of the complaint and all related records. Another copy shall be kept in clients' file with the Company.

Updates

The Company will perform a periodical review of this Procedure, at least once a year. The Procedure is in line with the Company's operational model, and therefore in case of any changes in the operations, these will be properly reflected in this Procedure.