

Complaints management policy

1. About the Policy

- 1.1. The purpose of the Policy is to set the procedure to be followed and the appropriate action required to be taken by us in the case of reception of any Complaint or grievance by any client or potential client either this client is a retail client, professional client or eligible counterparty for the reasonable and prompt handling of complaints or grievances.
- 1.2. The Policy is defined and endorsed by the senior management and the Board of Directors of the Company, who will be responsible for its implementation and the monitoring the Company's compliance with it.
- 1.3. The Policy is included in the Company's internal operations manual.
- 1.4. The Policy is available to all relevant staff of the Company through adequate internal channels of communication.
- 1.5. The Company publishes details of their complaints-handling process on the Company's official website www.tradernet.com.cy.
- 1.6. Complainants lodge complaints and receive responses free of charge.
- 1.7. The Policy does not apply to complaints or grievances that a client or potential client expresses by a method does not prescribe in the Policy.

2. Definitions

In the Policy, except where it follows otherwise from the context-

"Commission" means Cyprus Securities and Exchange Commission.

"Company, we, us" mean TRADERNET Limited.

"Complainant" means any person, natural or legal, which is eligible for lodging a Complaint to the Company and who has already lodged a Complaint.

"Complaint" means a statement of dissatisfaction addressed to the Company by a Complainant relating to the provision of investment services.

"Policy" means this Complaints management policy.

3. Lodging a Complaint

- 3.1. If a Complainant has any objection concerning the provision of investment and ancillary services and/or the performance of investment activities, it is encouraged to submit a complaint at customers@tradernet.com.cy with the subject of e-mail «Client complaint». A Complainant should use the Client complainant form of Annex A to the Policy.
- 3.2. In case a staff member needs to complain or report an incident, this will be communicated to the Compliance Officer, who, according to the nature of the grievant will decide on further steps and the persons within the organisation that need to be notified, as well as any measures to be taken.
- 3.3. The complaint will initially be received by the Customer Support and will be registered in our internal register by giving it a unique reference number as soon as possible. The unique reference number must be consisted of ten digits:
 - the first two digits are "FU",
 - the following four digits define the year, and
 - the last four digits denote the number of each complaint serial number (e.g. for 2018 - FU20180001, FU20180002, for 2019 - FU20190001, FU20190002).

The Customer Support confirms, within 5 (five days) the receiving of the Complaint to the Complainant and informs the Complainant about unique reference number and that it should use the said reference number in all future contact with us, the Financial Ombudsman and/or the Commission regarding the specific Complaint as well as the process that will be followed when handling a Complaint (e.g. when the Complaint will be acknowledged, indicative handling time, the availability (where applicable) to contact the Commission or the Financial Ombudsman or ADR mechanism or the relevant Courts).

- 3.4. To be noted, that upon an absence of the Customer Support (e.g. in a case of illness, annual leave, training, etc.), the General Manager will be responsible to replace him. All principles in regards to Conflict of Interest Policy and Chinese Walls will be implemented in such case.

4. Investigation

- 4.1. At the day of the registration of a Complaint in the internal register, the Head of the Reception and Transmission of Orders, the Head of Execution of Orders and the Compliance Officer shall receive notification of this from the Customer Support.
- 4.2. The documentation or other material that may assist in the resolution of the Complaint should be requested from the Complainant or our relevant department and added in the Complaint's file.
- 4.3. The Customer Support Officer to whom the Complaint has been directed shall establish contact with the Complainant and attempt to achieve an adequate solution, under consideration of the Complainant's vested interests, as well as those of the Company. If this should not succeed, the Customer Support Officer shall inform his direct superior, who shall also attempt to formulate an appropriate solution. If this should also fail, the Senior Management shall be extensively informed, which will then contact the client and finally formulate a solution, under consideration of both parties' interests.
- 4.4. Within two months of the investigation of the Complaint, we must inform the Complainant in writing about the outcome of the investigation. In the event where we are unable to respond within two months, we must inform the Complainant of the reasons for the delay and indicate the expected period within which the investigation will be completed. This period cannot exceed three months from the submission of the Complaint.
- 4.5. We are required to analyse, on an on-going basis, complaints-handling data, to ensure that we identify and address any recurring or systemic problems, and potential legal and operational risks, for example by:
- a) Analysing the causes of individual complaints so as to identify root causes common to types of complaints,
 - b) Considering whether such root causes also affect other processes or financial means, including those not directly complained of; and
 - c) Correcting, where reasonable to do so, such root causes.

5. Responses and final decisions

- 5.1. During the investigation of the Complaint, we inform the Complainant of the handling process of its Complaint every 5 (five) business days.
- 5.2. Once the issue has been resolved, the person responsible (Customer Support Officer) will document the resolution of the Complaint and a closed status for the Complaint will be given indicating that the Complaint has been dealt with explanations and description of actions taken.
- 5.3. The Complainant should be informed of the final decision within the timeframe indicated in point 4.4 of the Policy.

- 5.4. The Complaints processing should be fully documented and added to each client/employee file it relates.
- 5.5. The following details must be documented and kept in records by the Customer Support in regards to complaints:
 - The details of the ID of the client who filed the Complaint/grievant.
 - The service to which the Complaint/grievant refers.
 - Details of the employee that undertook to provide the service to the client.
 - The department or organisational unit to which the employee relates.
 - The date of receipt of the Complaint/grievant.
 - The content of the Complaint/grievant in summary.
 - The extent in financial terms of the potential loss that the client claims he has suffered or as it is derived from the content of the Complaint.
 - The date and in summary, the content of our reply to the said Complaint.
- 5.6. Records of all lodged and resolved complaints/grievant should be maintained for a minimum period of five (5) years.

6. Appeal

- 6.1. When providing a final decision that does not fully satisfy the Complainant's demands, the Company notifies in writing the Complainant using a thorough explanation of its position on the Complaint and set out the Complainant's option to maintain the Complaint e.g. through the Commission, the Financial Ombudsman, ADR Mechanism, or the relevant Courts.
- 6.2. A Complainant may use the following authorities to file an appeal against a final decision or in cases of a delay in a final decision:
 - i. The Commission:
Cyprus Securities and Exchange Commission
Office address: 27 Diagorou Str. CY-1097 Nicosia, Cyprus
Postal address: P.O BOX 24996,1306, Nicosia, Cyprus
Telephone: +357 22506600, Fax: +357 22506700
Website: www.cysec.gov.cy
 - ii. The Financial Ombudsman:
Postal address: 13 Lord Byron Avenue, 1096, Nicosia, Cyprus
Telephone: +357 22848900, Fax: +357 22660584, +357 22660118
Website: www.financialombudsman.gov.cy
E-mail:
Complaints: complaints@financialombudsman.gov.cy
Financial Ombudsman: fin.ombudsman@financialombudsman.gov.cy
 - iii. The Alternative Dispute Resolution mechanism (if applicable)
 - iv. The relevant judicial authority (court)

7. Responsibility and Submission of information to the Commission

- 7.1. Every month, within five days after the reporting month, the Company provides to the Commission, in electronic form, information regarding the complaints it receives and how these are being handled in accordance with Circulars C100, C198, as amended.
- 7.2. Customer Support is responsible for completing of information regarding the complaints to the Commission.

ANNEX A

CLIENT COMPLAINT FORM

Date:

Full name:	
ID/Passport No/Registration No:	
Account No:	
Contact detail including e-mail:	
Complainant cause:	
Complainant cause comments (if "other" selected in previous column):	
Financial instrument:	
Financial instrument comments (if "other" selected in previous column):	
The date of the last correspondence with the Company employee and the name of that employee:	
A detailed summary of the events leading up to a complaint:	
Expected resolutions/outcomes to rectify the situation:	

Signature:

If you wish to lodge a complaint against TRADERNET LTD, please, fill in this form, print, sign and send out it to customers@tradernet.com.cy.