

# COMPLAINTS HANDLING POLICY

Argus Stockbrokers Ltd  
Metropolis Tower, 1st & 2nd Floor  
25 Demostheni Severi Ave., 1080, Nicosia, Cyprus

Κ.Ε.Π.Ε.Υ. 010/03 Member of the CSE, ASE & ADEX  
Regulated by the Cyprus Securities & Exchange Commission

P.O. Box 24863, 1304, Nicosia, Cyprus  
t.+357 22717000  
f.+357 22717070  
email [argus@argus.com.cy](mailto:argus@argus.com.cy)  
[www.argus.com.cy](http://www.argus.com.cy)

## COMPLAINTS HANDLING POLICY

### **Introduction**

Argus Stockbrokers Ltd (hereafter the “Company”) is an Investment Firm incorporated and registered under the laws of the Republic of Cyprus, with registration number HE 108270. The Company is authorised and regulated by the Cyprus Securities and Exchange Commission (hereafter the “CySEC”) under the license number 010/03.

The Investment Services and Activities and Regulated Markets Law of 2007 including all its amendments and the Directives issued by CySEC (the “Regulations”) are the regulatory framework that governs Trading in Financial Instruments.

The Company maintains an effective and transparent procedure for handling complaints and grievances from clients. The Company keeps records of each complaint or grievance including all measures taken for its resolving.

### **Definition**

The Company considers as a complaint a statement unsatisfactory of financial 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.

### **Procedure**

The client contacts the Company to submit a complaint or grievance using the address and/or email and/or fax stated on the **Complaint Form**.

The Compliance Officer shall deal with clients’ complaints unless in cases when a conflict of interest might occur. In such cases the authorized personnel shall deal with it.

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

**Initial Response** will be given within the next **48 hours** from the receipt of the complaint.

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

### **Records and Reports**

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

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. In cases when the complaint involves the General Manager, it shall be mentioned in the Annual Report.

### **Submission of Complaint to the Financial Ombudsman**

You can refer your complaint to the Financial Ombudsman if you are dissatisfied with your assessment and ruling, provided that:

- Your complaint does not relate to an amount exceeding €170,000;
- Your first file a formal complaint to the Company within fifteen (15) months from the date that you are aware or ought to be aware that the reason of your complaint has occurred;
- You submit your complaint to the Financial Ombudsman within four (4) months from the date you receive our final response or from the closing date we ought to provide it to you in the case you do not receive our final response;
- No judgement has been issued from a Court for the same complaint or no judicial procedure is pending for the examination of the same complaint.

Please ensure that you copy your complaints' unique reference number given by our Company when you address your formal complaint to the Financial Ombudsman.

The contact details of Financial Ombudsman are as per below:

Financial Ombudsman of the Republic of Cyprus

Address: 13 Lord Byron Avenue, 1096 Nicosia, Cyprus

Phone: +357 22848900

Fax: +357 22660584, +357 22660118

E-mail: [complaints@financialombudsman.gov.cy](mailto:complaints@financialombudsman.gov.cy)

Website: <http://www.mcit.gov.cy/ccps>

## **Monitoring of Complaints**

The Company is required by CySEC to keep detailed records on complaints and submit information regarding the complaints received from our clients to CySEC on a monthly basis.

There is also relevant requirement for reporting to the Senior Management, on at least annual basis, on the complaints handling reporting to CySEC, as well as on the remedies undertaken or to be undertaken in relation to any deficiencies that may be identified.

Private information is not shared with any third parties and we comply with the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, known as “GDPR”) which has become applicable throughout the EU, including Cyprus, on 25 May 2018.

## **Updates**

The Company will perform a periodical review of this Policy, at least once a year. The Policy 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 policy.

*1 January 2018*

## CLIENT COMPLAINT FORM

### A. Client Information :

Name:	Account Number:
Address:	Telephone Number:

### B. Brief Summary of the Complaint:

Please describe the product or service you are complaining about (*description, evidence, amount and what you would like us to do to resolve it*):


*Please enclose any relevant documentation that may help us in dealing with the complaint.*

\_\_\_\_\_

Date and place

\_\_\_\_\_

Client Signature

<b><u>For internal use only:</u></b>	
Complaint Received By:	Date:
Acknowledgement sent to Client within 48hrs:	<input type="checkbox"/> Yes - <input type="checkbox"/> No
Informed Client of initial action:	<input type="checkbox"/> Yes - <input type="checkbox"/> No
Final response provided to Client within 4 weeks:	<input type="checkbox"/> Yes - <input type="checkbox"/> No
Holding response provided to Client:	<input type="checkbox"/> Yes - <input type="checkbox"/> No - <input type="checkbox"/> N/A
List of further actions taken as per holding response:	
Signature of compliance officer:	Date:

*1 January 2018*