ARGUS

COMPLAINTS HANDLING POLICY

Argus Stockbrokers Ltd
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Introduction

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

This Complaints Handling Policy is established in accordance with:

- the Investment Services and Activities and Regulated Markets Law, Law 87(I)/2017, as amended;
- the relevant CySEC Directives on organisational requirements and conduct of business;
- Directive 2014/65/EU (MiFID II); and
- the applicable ESMA Guidelines on complaints handling.

The objective of this Policy is to ensure the fair, transparent, and timely handling of complaints received from clients or potential clients.

Definition

A complaint is defined as any written expression of dissatisfaction, whether justified or not, made by or on behalf of a client or potential client, relating to the provision of investment or ancillary services by the Company.

Complaints may be submitted using the Company's Complaint Form or by any other written means.

Submission of Complaints

Clients may submit complaints to the Company by any written means, including but not limited to:

- email;
- post; or
- the official Complaint Form available on the Company's website.

The Company encourages the use of the Complaint Form to facilitate efficient handling; however, use of the form is not mandatory.

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

The responsible 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 8 weeks of the date of initial complaint submitting.

Complaints Handling Procedure

1. Upon receipt of a complaint, the Company shall acknowledge receipt in writing within forty-eight (48) hours, providing the client with a unique complaint reference number.
2. Complaints are handled by the responsible Officer, unless a conflict of interest exists, in which case the complaint shall be assigned to appropriately authorised personnel.
3. The Company shall investigate the complaint fairly and impartially.
4. A final response shall be provided to the client within four (8) weeks from the date of receipt of the complaint.
5. Where the complaint cannot be resolved within four (8) weeks, the Company shall issue a holding response, explaining the reasons for the delay and indicating the expected timeframe for the final response, which shall in any case not exceed two (2) months from the date of receipt of the complaint.

Record Keeping and Reporting

The Company shall maintain complete and accurate records of all complaints received, including:

- the complaint itself;
- correspondence with the complainant;
- investigation findings; and
- decisions and remedial actions taken.

Complaint records shall be retained for a minimum period of five (5) years, in accordance with applicable regulatory requirements.

The Company submits complaints data to CySEC on a monthly basis and prepares annual complaints reports to Senior Management, including analysis of root causes and corrective measures undertaken or planned.

Referral to the Financial Ombudsman

If a client is not satisfied with the Company's final response, the client may refer the complaint to the Financial Ombudsman of the Republic of Cyprus, provided that:

- the complaint does not exceed the amount of €170,000;
- the complaint was first submitted to the Company within fifteen (15) months from the date the complainant became aware, or ought reasonably to have become aware, of the matter giving rise to the complaint;
- the complaint is submitted to the Financial Ombudsman within four (4) months from the date of receipt of the Company's final response, or from the date by which such response should have been provided; and
- no court judgment has been issued and no judicial proceedings are pending in relation to the same matter.

Clients should quote the complaint reference number when submitting a complaint to the Financial Ombudsman.

Financial Ombudsman of the Republic of Cyprus
Address: 13 Lord Byron Avenue, 1096 Nicosia, Cyprus
Telephone: +357 22 848900

Email: complaints@financialombudsman.gov.cy
Website: https://www.financialombudsman.gov.cy

Data Protection

The Company processes personal data in accordance with the General Data Protection Regulation (EU) 2016/679 (GDPR).

Personal data collected in the context of complaints handling are processed solely for the purposes of investigating and resolving complaints, regulatory reporting, and compliance with legal and regulatory obligations, and are not disclosed to third parties except where required by law.

Review of the Policy

This Policy is reviewed at least annually and whenever material changes occur in the Company's operations or applicable regulatory framework. Any amendments are approved by Senior Management and communicated as appropriate.

Date: 01 January 2025

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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

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

Date: 01 January 2025