

COMPLAINTS PROCEDURE FOR CLIENTS

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 authorized and regulated by the Cyprus Securities and Exchange Commission (hereafter the “**CySEC**”) under the license number **010/03**.

In accordance with the ESMA Guidelines 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.

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 for submitting your Complaint

To submit a complaint to the Company, you are kindly requested to complete and submit the Complaint Form which is attached within this procedure to the following email address argus@argus.com.cy

Once you successfully complete and submit your complaint, the Compliance Department of the Company shall handle and investigate your complaint.

Acknowledge of your Complaint

The Company will acknowledge receipt of your complaint within **five (5) days** from the receipt of your complaint and provide you with a unique reference number of your complaint which should be used in all your future contact with the Company, the Financial Ombudsman and/or CySEC regarding the specific complaint.

Complaint Handling

Once the Company acknowledges receipt of your complaint, the Company will review your complaint carefully, investigate the circumstances around your complaint and put all efforts to resolve it without unnecessary delay. The Company will proceed to a thorough investigation of your complaint and provide you with the outcome of the investigation **within two (2) months** from the date you have submitted your complaint to the Company. During the investigation process the Company will keep you updated of the handling process of your complaint. In addition, you may be contacted by a Company’s officer (if needed)

either by electronic means or by phone to obtain further clarifications and/or information concerning your complaint.

If your complaint requires further investigation and the Company is not able to resolve it within two (2) months, the Company will provide you with a written response indicating the reasons of the delay and the approximate time of finalization. In this case, the Company will provide you with the outcome of the investigation no later than one (1) month from the date of sending you the written response.

Submission of Complaint to the Financial Ombudsman and CySEC

If you are not satisfied with the Company's final decision you may submit your complaint to the Financial Ombudsman of the Republic of Cyprus and seek mediation for possible compensation. It is important that you contact the Financial Ombudsman of the Republic of Cyprus within four (4) months of receiving a final response from the Company otherwise the Financial Ombudsman of the Republic of Cyprus may not be able to deal with your complaint.

In the unlikely event that the Company was unable to provide you with a final response within the three (3) months period specified above you may again contact the Financial Ombudsman of the Republic of Cyprus no later than four (4) months after the date when the Company ought to have provided you with the final decision.

Contact details of Financial Ombudsman:

Financial Ombudsman of the Republic of Cyprus

Postal Address: 13 Lord Byron Avenue, 1096 Nicosia, Cyprus

Telephone: +357 22848900

Fax: +357 22660584, +357 22660118

E-mail: complaints@financialombudsman.gov.cy

Website: www.mcit.gov.cy/ccps

You may contact CySEC and report your complaint however please note that CySEC does not have restitution powers and consequently does not investigate individual complaints.

Please note that your right to take legal action remains unaffected by the existence or use of any complaints procedures.

Contact details of Cyprus Securities and Exchange Commission:

Cyprus Securities and Exchange Commission

Postal Address: P.O. BOX 24996, 1306 Nicosia, Cyprus

Telephone: +357 22506600

Fax: +357 22506700

E-mail: info@cysec.gov.cy

Website: www.cysec.gov.cy

Record Keeping

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.

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.

Update

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.

Date: 01 June 2020

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

<u>For internal use only:</u>	
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:

Date: 01 June 2020