

Colmex Pro Limited

COMPLAINTS HANDLING PROCEDURE

Applicable as of 13 April 2021

Scope

Following the implementation of the Directive 2014/65/EU of the European Parliament and of the Council of 14 May 2014 on Markets in Financial Instruments ('MiFID II'), the Investment Services and Activities and Regulated Markets Law of 2017 (Law 87(I)/2017), and in accordance with the Commission's Delegated Regulation (EU) 2017/565 ('MiFID II Delegated Regulation'), as well as the Guidelines for complaints-handling for the securities (ESMA) and banking sectors (EBA) JC 2018 35, dated 4 October 2018, the Company is required to provide its clients and potential clients with a Complaints Handling Procedure ('the procedure')

Under the above legislation, the Company is required to establish, implement and maintain effective and transparent complaints management policies and procedures for the prompt handling of clients' complaints. The Company is committed to act honestly, fairly and professionally and in the best interests of its clients, and to comply with the principles set out in the above legislation when providing any investment and/or ancillary services.

With this Procedure, we hereby provide you with the details of the procedure to be followed when making a complaint to Colmex Pro Ltd ('the Company').

The Policy gathers all measures taken by the Company for the prompt handling of clients' or potential clients' complaints.

This Policy is not intended to, and does not create third party rights or duties that would not already exist if the Policy had not been made available.

Definition

1. A complaint is an expression of dissatisfaction by a client regarding the provision of investment and/or ancillary services provided by Colmex Pro Ltd.
2. A complaint must be written and made and/or translated into English. It should include the following information:
 - The client's full name
 - The client's trading account number
 - The affected transaction(s) number (if applicable)
 - Date and time that the issue causing the complaint arose
 - A full and clear description of the issue causing the complaint/content of the complaint and all relevant factual circumstances
 - Reference to any correspondence exchanged between the Company and the client (such correspondence should be attached)
3. The Company may, at its discretion, refuse to handle a complaint if any of the requirements contained in subparagraph 2.2 above is not fulfilled.

Procedure

1. Any expression of dissatisfaction must be in writing and firstly addressed to the Customer Support Department (support@colmexpro.com). The Customer Support Department shall resolve the issue as soon as reasonably practicable and inform the client of the outcome/conclusion. If it is deemed necessary, the Customer Support can transfer the complaint to the Compliance Department.
2. In addition, if the client receives a response from the Customer Support Department but considers that the issue needs to be further examined and raised to the compliance department of the Company, the client, in order to make an official complaint, should request the Customer Support Department to provide him with the Client's Complaint Form (the "form") that should be filled in and submitted by the client to the Compliance Department of the Company (at compliance@colmexpro.com) which will independently and impartially investigate the complaint. Within 5 business days from submitting the above-mentioned form, the client will receive an email of acknowledgment of the submitted complaint and a unique reference number (the 'reference number') that should be used in all future communication with the Company and/or the Financial Ombudsman of the Republic of Cyprus ('the Financial Ombudsman') and/or the Cyprus Securities and Exchange Commission ('CySEC').

Please note the Company reserves the right, at its sole discretion, to issue a unique reference number to a client's expression of dissatisfaction, without the client having completed the above-mentioned form.

3. The Compliance Department shall thoroughly examine complaints taking into account all available relevant information, including but not limited to the information contained in the books and records of the Company and the client's trading account journal, and reach a fair and reasonable conclusion.
4. The Compliance Department shall:
 - a. send an initial response to the client as soon as the examination of the complaint is concluded and no later than within 2 months from the date that the client's complaint form was received.
 - b. In cases that further investigation is required and therefore, the Company is unable to respond to the complaint within the timeframe of two months, the Company shall inform the client of the reasons for the delay and the expected timeframe needed to complete the investigation and respond to the client.
5. All complaints will be treated with utmost confidentiality.

Relevant contacts

- Customer Support Department's email: support@colmexpro.com
- Compliance Department's email: compliance@colmexpro.com

Client's dissatisfaction

In cases where a client is dissatisfied with the Company's approach and final response, the client can either request from the management of the Company to review the case again or directly address the issue to the **Financial Ombudsman** or to the **Cyprus Securities and Exchange Commission (CySEC)**.

A complaint to the Financial Ombudsman should be filed within 3 months from the receipt of the response containing the conclusion of the Compliance Department of the Company.

For contacting the Financial Ombudsman please refer to the to the following information:

Address: 13 Lord Byron Avenue, 1096 NICOSIA
Phone: 22848900 (main number)
Facsimile (Fax): 22660584, 22660118
E-mail Complaints: complaints@financialombudsman.gov.cy
Financial Ombudsman: fin.ombudsman@financialombudsman.gov.cy

The complaint to the Financial Ombudsman should be accompanied by evidence of the paid fee of €20.

The payment can be made at any of the following banks:

(a) Cooperative Central Bank (Συνεργατική Κεντρική Τράπεζα) or Cooperative Institution, IBAN: CY16 0070 1010 0000 0000 4002 8214

(β) Hellenic Bank (Ελληνική Τράπεζα) IBAN: CY78 0050 0109 0001 0901 7087 6401

(γ) Bank of Cyprus (Τράπεζα Κύπρου) IBAN: CY52 0020 0195 0000 3570 1944 4789

For more information, please visit the website www.financialombudsman.gov.cy.