

## **CLIENT COMPLAINTS HANDLING POLICY**

Broctagon Prime Ltd (“**Broctagon**” or the “**Company**” or “**we**”) is authorised and regulated by the Cyprus Securities and Exchange Commission (“**CySEC**”) as a Cyprus Investment Firm (CIF) with Licence No. 320/17, and thus subject to CySEC complaints handling procedures and legislation requirements.

The Company has adopted this Client Complaints Handling Policy and Procedure in order to ensure a fair and quick process for handling complaints that may arise from our relationship.

“**Complaint**”- shall mean an expression of dissatisfaction by a Client or potential client regarding the provision of investment and/ or ancillary services provided to him/her by the Company. Only a duly completed, submitted Complaint Form, as indicated below, accompanied by adequate supporting evidence (as necessary) will be recorded as a Complaint by the Company and will be handled as such.

The Company’s Terms and Conditions are supplemented by the provisions of this Policy.

This Policy also forms part of the Financial Services Agreement, referring to the financial services agreement as this has been entered into for the provision of investment services.

Capitalised terms used but not defined herein shall have the meanings ascribed to such terms in the Terms and Conditions.

### **1. Submitting your complaint**

Any query and/or concern and/or issue and/or problem you may have in respect of the services provided by the Company in respect of the Financial Services Agreement should be made in writing and addressed to the Compliance Department by sending an email to [compliance@broctagonprime.com](mailto:compliance@broctagonprime.com)

Should you wish to submit an official Complaint, you may submit it in writing and addressed to the Compliance Department of the Company which is authorised to handle and investigate complaints that may be submitted from our clients.

In order to do so, you must use the relevant Complaint Form, as provided with **ANNEX 1** below, and submit it in any of the following ways:

1. By sending by post or delivering in person the attached Complaint Form at the following address: 2 Christou Samar, Morfo Court, Mesa Geitonia, 3rd Floor, 4001, Limassol Cyprus; or
2. By submitting the Complaint Form electronically at the following email address: [compliance@broctagonprime.com](mailto:compliance@broctagonprime.com);
3. By Facsimile at: +357 25 35 44 33

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

## **2. Acknowledging your complaint**

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

## **3. Handling of your complaint**

Once we acknowledge receipt of your complaint we will review it carefully, investigate the circumstances surrounding your complaint and will try to resolve it without undue delay. One of our officers may contact you directly (including communication by email or phone) in order to obtain further clarifications and information relating to your complaint. We shall need your cooperation in order to handle your complaint.

We shall make every effort to investigate your complaint and provide you with the outcome of our investigation within two (2) months from the date you have submitted your complaint to us. During the investigation process will keep you updated of the handling process of your complaint.

In the event that your complaint requires further investigation and we cannot resolve it within two (2) months, we will issue a holding response in writing or other durable medium. When a holding response is sent, it will indicate the causes of the delay and when the Company's investigation is likely to be completed. In any event, we shall provide you with the outcome of our investigation no later than one (1) month from the issuing of the holding response, depending on the complexity of the case and your cooperation. Please note that the Company shall consider your complaint as closed and cease the relevant investigation in case you fail to respond to our officers within the period of three (3) months from the date of the submission of your complaint.

## **4. Final Decision**

When we reach an outcome, we will inform you of it together with an explanation of our position and any remedy measures we intend to take (if applicable) (the “**Final Decision**”).

A Final Decision is a written response from the Company which either:

- (a) accepts the Complaint and, if appropriate, offers redress (appropriate redress may not involve financial redress, it may, for example, simply involve an apology) in accordance to the Company's policy to resolve complaints in amicable and good business terms;

- (b) offers redress without accepting the Complaint, as a gesture of goodwill and in accordance to the company's policy to resolve complaints in amicable and good business terms; or
- (c) rejects the Complaint and gives reasons for doing so.

Further clarifications on the Final Decision may be provided following the complainant's subsequent communication with the Company.

A complaint will be deemed as resolved or settled where the Company has sent in writing a Final Decision and/or further clarifications on the Final Decision to the complainant.

Furthermore, should a complainant fail to reply to any communication from the Company (including the Final Decision) for a period of greater than one (1) month, the Company will consider the Complaint time-barred and closed.

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) month time period specified above you may again contact the office of the Financial Ombudsman of the Republic of Cyprus no later than four (4) months after the date when we ought to have provided you with our final decision.

1. Contact Details of the Financial Ombudsman of the Republic of Cyprus:

**Website:** <http://www.financialombudsman.gov.cy>

**Email:** [complaints@financialombudsman.gov.cy](mailto:complaints@financialombudsman.gov.cy)

**Postal Address:** P.O. BOX: 25735, 1311 Nicosia, Cyprus

**Telephone:** +35722848900

**Fax:** +35722660584, +3572266011

2. Contact Details of the Cyprus Securities and Exchange Commission:

**Website:** <http://www.cysec.gov.cy>

**General email:** [info@cysec.gov.cy](mailto:info@cysec.gov.cy)

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

**Telephone:** +35722506600

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**Fax:** +35722506700

You may maintain your complaint with the Cyprus Securities and Exchange Commission, however please note that the Cyprus Securities and Exchange Commission does not have restitution powers and therefore does not investigate individual complaints.

Further information as to the procedure you need to follow can be found on :

<https://www.cysec.gov.cy/en-GB/investor-protection/how-to-complain/>

It is understood that your right to take legal action remains unaffected by the existence or use of any complaints' procedures referred to above.

## **5. Records and Reporting**

The Company is required to keep and continuously update records of all the Complaints received by clients and potential clients with details of the investigation conducted, the final outcome of these, any remedy measures undertaken and all the communication with the complainants.

The Compliance Department shall maintain the appropriate records in this respect and it shall regularly monitor and review the Company's compliance with the applicable regulatory requirements for handling client Complaints and record-keeping. Furthermore, the Compliance Department shall report regularly to CySEC information regarding client Complaints filed to the Company in line with its regulatory obligations.

## **COMPLAINT FORM**

The Complaint Form that the Complainant needs to fill in in order to submit the Complaint to Company is provided with **ANNEX 1** of this Policy.

Complete, up-to-date as well as accurate information is required to be provided to the Company for the proper investigation and evaluation of the Complaint.

The Complaint Form as per Annex 1 below is only indicative and not exhaustive.

The Company may request further information and/or clarifications and/or evidence with regards to the Complaint.

## **ANNEX 1 - COMPLAINT FORM**

**DATE:**

### **CLIENT INFORMATION**

Legal Entity Name (in case the Client is a legal person):

Name of the Authorized Representative:

Account Number:

### **CONTACT DETAILS OF THE CLIENT**

Postal Address:

City/Province:

Code:

Country:

Telephone Number:

Email:

### **DETAILS OF THE COMPLAINT**

Date when the Complaint was created:

Employee who offered the services to the Client (if applicable):

Description of the Complaint: (use a separate sheet if necessary)

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I hereby certify and confirm that to the best of my knowledge, the information furnished above is true, accurate, correct and complete.

Signature

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For Official Use Only	
Received on:	Assigned to:
Received by:	Signature