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Complaints Handling Policy

Tradestone Ltd

89, Vasileos Georgiou A' street, Office 101,
Potamos Germasogeias 4048, Limassol, Cyprus

2022

Version Control

Document Owner: **Tradestone Ltd**

Version No.	Approval Date:	Revisions/Changes:
4.0	May 2021	Update of Policy
5.0	September 2022	Update of Policy



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CySEC License 331/17

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1. Introduction

Tradestone Ltd. (hereinafter the “**Company**”, “**We**” or “**Us**”) is a Cyprus Investment Firm (hereinafter the “**CIF**”) incorporated and registered under the laws of the Republic of Cyprus, with registration No. HE 353534. The Company is authorised and regulated by the Cyprus Securities and Exchange Commission (hereinafter the “**CySEC**”) under the license No.331/17.

This Policy is made in accordance with the Law 87(I)/2017 as from time to time amended and all relevant secondary legislation (the directives of the CySEC).

1.1 Definitions

“**Complainant**” means any person, natural or legal, which is eligible for lodging a complaint to the Company and/or who has already lodged a complaint.

“**Complaint**” means a statement of dissatisfaction addressed to the Company by a complainant relating to the provision of investment services.

2. Complaint or grievance handling

The purpose of this Policy is to set out the procedure to be followed and the appropriate action required to be taken by Company in the case of a complaint by any client to ensure the Company’s compliance with Article 26 the Delegated Regulation (EU) 2017/565 supplementing Directive 2014/65/EU as regards organisational requirements and operating conditions for investment firms and defined terms for the purposes of that Directive.

The Company shall establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints and/or grievances received from retail or potential retail clients, and to keep a record for each complaint and/or grievance and the measures taken for the complaint’s resolution.

In addition, the Company is required to:

- ✚ Apply a complaints management policy, which is defined and endorsed by the senior management and the board of directors and assign the Compliance Officer as the person who will be responsible for its implementation and for monitoring the Company’s compliance with it.
- ✚ Ensure that it has a complaints management function, which enables complaints to be investigated fairly and possible conflicts of interest to be identified and mitigated.

3. Types of Complaint Handling

We will investigate any written expression of dissatisfaction that the client has against our Company relating to the Investment and/or Ancillary services provided by our Company. The types of a complaint may include, but not limited to, the following:

- ✚ A perceived injustice because of an alleged maladministration on our part, pertaining to:
 - i. Your Account with us and/or the Transactions and/or Contracts carried out and/or reflected therein.
 - ii. Your rights under the Client Agreement- T&C, our policies of Client Categorization, Order Execution, Money Laundering and the Investor Compensation Fund Scheme, all included in the About Us section on our website www.fbs.eu
- ✚ A denial of a request for information regarding your Account and/ or Transactions and/or Contracts carried out and/or reflected therein.



- ✚ Dissatisfaction with any of our response to any of your enquires and/or the time that we have taken to respond.

3.1 Complaints on an on-going basis

The Company analyses, on an on-going basis any complaints data, to ensure that they identify and address any recurring or systemic problems, and potential legal and operational risks, for example by:

- ✚ Analysing the causes of individual complaints to identify root causes common to types of complaints.
- ✚ Considering whether such root causes also affect other processes or financial means, including those not directly addressed to; and
- ✚ Correcting, where reasonable to do so, such root causes.

3.2 Requirements

All complaints must be sent:

Either in a hard copy form to the Company's business address at **89, Vasileos Georgiou A' street, Office 101, Potamos Germasogeias 4048, Limassol, Cyprus;** and/or

Complete it and submit it through client's **Personal Area** under Complaints Section; and/or

In an electronic form to our email address: complaints@fbs.eu.

All complaints/disputes between us, must be dealt with in the Republic of Cyprus, in accordance with the present Complaints Handling Policy and you hereby agree that we shall have the right to resolve any complaint or dispute between us in accordance with the present Complaints Handling Policy.

3.3 Timeframes

Any discrepancies on account statements should be reported to us, in writing, within twenty (24) hours of its occurrence. Failure to object within the above-mentioned twenty-four (24) hour time period may be, at the Company's reasonable discretion, deemed as a ratification by you of all actions taken by us prior to your receipt of such reports. You agree to immediately call to our attention any oral information that you have reason to believe is inconsistent with your own information. You understand, acknowledge, and agree that errors, whether resulting in a profit or loss to you, shall be corrected, and your Account with us will be credited or debited in such manner and extent as to place your Account with us, in the same position in which it would have been had the error not occurred.

All other complaints should be reported to us, in writing, within three (3) Business Days from the occurrence of the event that gave rise to your complaint (for the purposes hereof, unless the context requires otherwise, "Business Days" are Monday through Friday, excluding bank holidays in Cyprus). Failure to object within the above-mentioned time of three (3) Business Days from the occurrence of the event that gave rise to your complaint, may be deemed, at the Company's reasonable discretion, as a ratification by you of all actions undertaken by us prior to making your complaint.

Notwithstanding the above, the Company, as part of its commitment to treat all of its clients fairly, will review and handle a complaint which was submitted outside the timeframes indicated above. However, if your complaint is submitted to us fifteen (15) months from when you became aware, or ought to have been aware, of the issue that gave rise to your complaint, your complaint might not be eligible to be reviewed by the Financial Ombudsman.

4. Procedure to be followed when a formal complaint or grievance is received

Clients who wish to submit a formal complaint must complete the Complaint Form (Appendix 1) available on <https://fbs.eu> or through their Personal Area and send it either in a hard copy form along with a copy of the complainant's identification document and any additional documentation that would be relevant to the complaint, to the Company's business address (see above) or submit the complaint by e-mail to Company's designated email (see above)

a) A complaint and/or grievance is initially handled by the Compliance Department. When complaints are received, all necessary actions shall be taken so that the complaint and/or grievance is properly addressed.

b) The complaint and/or grievance, in the terms that has been received immediately, should be forwarded to the head of the department where the complaint is addressing.

c) An automatic email shall be sent or Compliance Department shall send a written acknowledgement letter (Appendix 2) within five (5) days from the date the complaint was received, informing the complainant of the unique reference number that has been assigned to client's complaint for future reference and that the complaint and/or grievance is under investigation and has been forwarded to the relevant department/person, providing all details so that the complainant is aware of the person/dept who is dealing with his/her complaint and/or grievance. Along with the letter, the Company's Complaint Handling Policy shall be provided to the complainant free of charge.

d) Upon receiving a written complaint and/or grievance, the following details should be obtained and recorded:

- + Complaint Reference No.
- + Name, address and account number (if available) of the complainant.
- + Date of receipt of the complaint.
- + Department(s) involved in the complaint investigation along with the names of the employees responsible.
- + Description of the nature of the complaint.
- + Complaint disposition.
- + The capital and the value of the financial instruments which belong to the client.
- + The magnitude of the damage claimed by the client.
- + Reference to any correspondence that occurred between the Company and the client.

e) The events leading to the complaint and/or grievance should be examined and assessed based on the information provided by the client.

d) The member of staff, in addition to the above, should make his best of efforts to ensure that the complaint and/or grievance to be resolved immediately, if possible, depending on the nature and complexity of such complaint. In such cases the member of staff shall not:

- o Commit him/herself in any way to the client.
- o Address any issues in relation to best execution.
- o Address any issues relating to legal issues.
- o Commit the Company in taking any action prior to examining the issues in a formal manner.
- + The facts, as stated by the client, have been examined and verified whether any additional information, needs to be retrieved from the Company's archive (electronic mail, recorded telephone calls, IT data, etc.).
- + All non-trivial complaints and/or grievances shall be brought to the attention of and their resolution

should be approved by the Senior Management;

- ✚ Upon completion of the investigation, a report shall be prepared stating the facts and then be brought to the senior management's attention, which will decide on the formal response to the client and the action to be taken.
- ✚ Upon completion of the investigation, the member of the Compliance Department shall inform the complainant in writing, using a simple language which is clearly understood, about the results of the investigation and the actions taken to satisfy the complainant's demand(s) without any unnecessary delay.
- ✚ The Company will inform the complainant in detail about causes of delay, a status of the investigation process and an expected date of completion of the investigation by email which will be sent to the client within ten (10) to fifteen (15) Business Days after the date that the complaint was received.

In the event that the complaint requires further investigation, and the Company is unable to resolve it within ten (10) to fifteen (15) business days from the date it was submitted, the Company shall inform the client of the reasons for the delay and provide an estimated time to resolve the issue. The Company shall consider any complaint as closed and cease the relevant investigation in case the client fails to respond within the period of three (3) months from the date of the submission.

4.1 Final Decision

The Company will attempt to provide its Final Decision within two (2) months, from the day the initial complaint is received, but not later than the timeframe provided in the regulation.

In the case where a client complaint and/or grievance is valid, the management shall take all necessary action together with the Head of Department(s) to which the complaint and/or grievance is related with, in order to identify and verify:

- ✚ Reasons of failure/lapse of procedure followed.
- ✚ Weaknesses of the internal controls.
- ✚ Implementation of internal controls that will prevent any complaint and/or grievance in the future.

All suggested procedures shall be approved by Senior Management, at the meeting following the completion of the investigation.

The above-mentioned procedure shall be disclosed in a summarized form to the complainant through the agreement which is signed for the provision of investment services.

4.2 Further Adjournment

If, for whatever reason, we are unable to conclude the investigation and provide a Final Decision (see above) to your complaint within the time limits set forth above, then we will issue what is called a "Further Adjournment".

The purpose of this Further Adjournment is to inform you of the reasons why we cannot provide a Final Decision to your complaint within the time limits set forth above and to provide a further indication of what is happening with your complaint and also to provide an indication of when you can expect to hear from us again.

In the event that you receive a Further Adjournment, we would invite you to discuss the matter personally with our Managing Director. The purpose of this step is to ensure that you (and your complaint) receive the highest priority in those situations where the complaint cannot be fully resolved through normal investigatory processes.

4.3 Submission of Complaint to Financial Ombudsman and CySEC

If you the complainant are not satisfied with the Company's final decision, you may check with the office of 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 the date receiving the Final Decision from the Company otherwise the Financial Ombudsman of the Republic of Cyprus may not be able to deal with your complaint.

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

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

Email: complaints@financialombudsman.gov.cy

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

Telephone: +35722 848-900 **Fax:** +35722 660-584, +35722 660-118

In the unlikely event that the Company was unable to provide the complainant with a Final Decision, within a three (3) month time period you may again contact the office of the Financial Ombudsman of the Republic of Cyprus not later than four (4) months after the date when we ought to have provided you with our final decision.

The complainant may disclose his/her complaint to the Cyprus Securities and Exchange Commission. However, he/she should note that the Cyprus Securities and Exchange Commission does not have restitution powers and therefore does not investigate individual complaints.

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

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

General email: info@cysec.gov.cy

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

Telephone: +35722 506-600 **Fax:** +35722 506-700

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

4.4 Record-keeping of complaints and/or grievances received.

The department held responsible for the record keeping of complaints and/or grievances received is the Back Office / Account Opening Department. Particularly, the Head of the Back Office, or his/her designee, will keep a record for each complaint together with the measures taken for the complaint's resolution.

The complaint shall be registered, upon receipt, on an internal archive and in an appropriate manner. The Head of the Back Office, or his/her designee, shall maintain a central record of all complaints and/or grievances for a minimum period of five years.

The relevant Department is required to report to the Senior Management, on at least a monthly basis, on the complaints handling reporting to CySEC, as well as on the remedies undertaken or to be undertaken in relation to any deficiencies and/or weaknesses that may be identified.

4.5 Accountability to CySEC

The Company is required to provide the Commission with information regarding the complaints it receives and explain how these are being handled. The Company has the obligation to complete Form T144-002-01 and electronically submit it to CySEC. The said form is to be submitted monthly, within 5 days after the end of the reporting month.

5. Updates

The Company will perform a periodical review of this Policy, at least once a year. The Policy is in line with the Company's operational model, and therefore should there be any changes in the operations, these would properly be reflected in this Document.



APPENDIX 1

COMPLAINTS FORM

This is the form you need to fill-in if you wish to submit your complaint to Tradestone Ltd (hereinafter the “**Company**”). Complete, accurate and up-to-date information is required to be provided to the Company for the proper investigation and evaluation of your complaint.

Please note that the below Complaint Form is only indicative and may not be exhaustive. The Company may request further information and/or clarifications and/or evidence with regard to your complaint.

Date:

Complaint Reference No.:

CLIENT INFORMATION

Name: _____

Surname: _____

ID or Passport Number: _____

Country of nationality: _____

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

Account Trading Number: _____

CONTACT DETAILS OF THE CLIENT

Postal Address: _____

City/Province: _____

Code: _____

Country: _____

Telephone Number: _____

Email: _____



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