

COMPLAINTS HANDLING POLICY

LIONSMAN CAPITAL MARKETS (CYPRUS) LTD (“the Company”) is an Investment Firm incorporated and registered under the laws of the Republic of Cyprus, with registration number HE 279944. The Company is authorized and regulated in Cyprus by the Cyprus Securities and Exchange Commission (hereinafter referred to as “CySec”) and subject to CySec rules, with CIF license number 175/12. The Company does its utmost to ensure the privacy, confidentiality and security of its clients are preserved both throughout their interaction with the company and afterwards, to the fullest extent achievable by the Company.

The Company provides services through the use of numerous platforms and under the domain of www.lionsmancm.com (hereinafter referred to as “lionsmancm.com”).

The Privacy Policy applies to all clients equally whether they are former, present or future clients of the Company.

The complaints handling policy of the Company is to be performed by the Back Office/ Account Opening Department in order for the contact with the client to be performed and the complaint to be resolved. However, the final approval shall be provided by the Compliance Officer and the ultimate responsibility lies with the Senior Management.

The procedure which is followed by the Company, when handling with clients’ complaints is the following:

The complaint would be received from a member of staff to the Back Office/ Account Opening Department. The employee receiving the complaint shall take the necessary actions so that the complaint is properly addressed.

The complaint in the form that has been received immediately (within the same working day or within the following, if this is received after the end of the business day), should be forwarded to the head of department, where the complaint is addressed.

The member of the Back Office/ Account Opening Department shall inform the client that he/ she is not responsible to deal with the complaint and that the complaint has been forwarded to the relevant department/ personnel, providing all details so that the client is aware who is dealing with his/ her complaint.

The member of staff, in addition to the above, should make all best efforts to ensure that in the case of the complaint being of such nature that can be resolved immediately, to do so that the client will not have to pursue the filling of a formal complaint. The member of staff in such case shall not:

- i. Commit him/ herself in any way to the client.
- ii. Address any issues in relation to best execution.
- iii. Address any issues relating to legal issues

- iv. Commit the Company in taking any action prior to examining the issues in a formal manner

Procedure to be followed when a formal (Appendix 1: Complaint Form) complaint is received:

- a. When the written complaint is received, this shall be forwarded to the relevant department which is the most appropriate for dealing with the complaint.
- b. The head of the relevant department shall contact the client to inform him/ her that the complaint has been received and it is under investigation.
- c. Upon receiving a written complaint, the following details should be obtained and recorded:
 - The identification particulars of any client having made a complaint.
 - The Service provided by the Company and related to the complaint.
 - The employee responsible for the provision of those services.
 - The department where the employee belongs.
 - Date of receipt and registration of complaint.
 - Content of the complaint.
 - The capital and the value of the financial instruments which belong to the client.
 - Reference of any correspondent exchanged between the Company and the client.
- d. The events leading to the complaint should be examined and assessed based on the information provided by the client.
- e. The facts as stated by the client have been examined and verified whether any additional information, need to be retrieved from the Company's archive (electronic mail, recorded telephone calls, IT data, etc).
- f. All complaints shall be brought to the attention of the Company's Senior Management.
- g. All complaints are to be handled within 3 working days, provided that all relevant information and documentation have been provided to the relevant Department.
- h. Upon completion, a complaint registration form report shall be prepared stating the facts and brought to the Senior Management's attention (Appendix 2), which will decide on the formal response to the client and the action to be taken.

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

- Reasons for failure of procedure followed.
- Weakness of the internal controls.
- Implementation of internal controls that would prevent any complaint in the future.

All suggested procedures shall be approved by the Board of Directors at the meeting following the completion of the investigation.

Appendix 1

CLIENT COMPLAINT FORM

A. Client Information

| | |
|-----------------------------|--------------------------|
| <u>Full name of client:</u> | <u>Account number:</u> |
| <u>Address:</u> | <u>Telephone number:</u> |

B. Brief Summary of the Complaint

Please describe the product of service you are complaining about (Description, Evidence and suggested way to be solved).

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Please enclose any other relevant documentation that may help us handle the complaint.

Client signature:

Date and place:

COMPLAINT REGISTRATION FORM (Internal use only)

Complaint received by: **Date and Time:**

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|---|--|
| Full name of client: | |
| Account Number: | |
| Equity before: | |
| Equity after: | |
| Claimed Magnitude of damage: | |
| Content of complaint: | |
| | |
| Action Taken: | |
| | |
| <i>Customer support employee signature:</i> | |
| <i>Head of relevant Department signature (if required):</i> | |