

Clients Complaints Handling Procedure

1. Introduction

- 1.1. Alfa Capital Holdings (Cyprus) Limited (“ACC” or “the Company”) is a Cyprus Investment Firm incorporated and registered in accordance with the laws of the Republic of Cyprus under registration number HE 78416.
- 1.2. The Business name Alfa Capital Holdings (Cyprus) Limited and the domain name <http://www.alfacapital.com.cy/> are ownership of ACC.
- 1.3. ACC is authorized and regulated by the Cyprus Securities and Exchange Commission (“CySEC”) under license number CIF025/04. The Company is governed by the provisions of the Markets in Financial Instruments Directive 2014/65/EU (“MiFID II”) of the European Union, following its implementation in the European Union and its transposition in Cyprus, through the Investment Services, the exercise of Investment Activities and the Operation of Regulated Markets Law of 2017 (Law 87(I)/2017).

2. Definitions

- 2.1. Client or “you” - means any natural or legal person to whom ACC provides Investment and / or Ancillary Services, as described in Annex I of MiFID II.
- 2.2. Complainant¹ - means any person, natural or legal, which is eligible for submitting a Complaint to ACC and who has already submitted a Complaint.
- 2.3. Complaint - means a statement of dissatisfaction addressed to the Company by a Complainant relating to the provision of Investment and/or Ancillary Services, as described in Annex I of MiFID II.

3. Complaints Handling Process

Procedural Requirements

- 3.1. Any Complaint submitted to ACC should be dealt with in Cyprus, and you agree that ACC shall have the right to resolve any Complaint between us, in accordance with the Complaints Handling Procedures set forth herein.

Types of Complaints handled

- 3.2. Any Complaint submitted in accordance with the Client Complaint Procedure as set forth herein will be handled by ACC.

¹ Requests for information, opinions, clarification, services or benefits are not considered Complaints.

Complaint submission

3.3. Any Client, who wishes to file a Complaint, can do so via the standard “*Client Complaints Form*”, which can be downloaded from the Company’s official website at <https://alfacapital.com.cy/en/client-area/clients-complaints/>.

Complaints Submission Channels

3.4. A Complaint related to an Investment and / or Ancillary Service provided by ACC should be submitted using the “*Client Complaints Form*” through the following dedicated Complaint Submission Channels:

- **By E-mail:** complaints@alfacapital.com.cy
- **By Post:** Themistokli Dervi 3, Julia House Building, 4th Floor, P.C. 1066, Nicosia, Cyprus
- **By Fax:** +357 22 681 505

3.5. In the event of the receipt of a Complaint or a suggestion through channels other than those specified above, the Client should be advised to re-submit the matter using one of the appropriate channels.

Acknowledge of Clients Complaints

3.6. All Complaints need to be acknowledged within five (5) business days of receipt of a Complaint. The written acknowledgement will confirm the receipt of the Complaint, inform you of the process that we will follow to resolve the Complaint, and the timeframe within which we aim to resolve the Complaint.

Registration of Clients’ Complaints

3.7. Complaints received from Clients or potential Clients are registered in the Company’s Complaints Register, which is managed and controlled by the Compliance Department. A unique registration number is assigned to each Complaint and is attached to the record of the Client’s Complaint in the Company’s Complaints Register.

4. Response to Complaints

4.1. Once the investigation assessment process regarding a Complaint is finalised, the Company will provide the Client in writing a summary of the outcome of the investigation.

4.2. Our response to your Complaint will be sent to you the latest within two (2) calendar months after receiving your Complaint unless further time is required to complete full investigation because of the Complaint’s complexity. In such case, you will be notified accordingly and you will be informed of the reasons for requiring extension of time. In any event, the revised timeframe should not be more than three (3) calendar months from the initial submission of your Complaint.

4.3. Such responses will be marked clearly as the Final Response. In case we decide not to satisfy your Complaint we will provide you with a written detailed explanation of our position on the Complaint. Furthermore, our Final Response will include details of how to file your Complaint

with other relevant mechanisms such as the Financial Ombudsman of Cyprus, the CySEC or the relevant courts, in case your Complaint is not resolved to your satisfaction.

5. Client's dissatisfaction

5.1. In case, the Complaint is not possible to be resolved internally by ACC in line with the Complaint Handling Procedures set out herein, the Client has the option to maintain his/her Complaint through the Financial Ombudsman of Cyprus or CySEC or the relevant courts.

The Financial Ombudsman

5.2. The Financial Ombudsman is an independent service for settling disputes between the financial firms and their Clients. Further information is available on the Financial Ombudsman website, at <http://www.financialombudsman.gov.cy>.

5.3. A Client or potential Client may escalate his/her Complaint to the Financial Ombudsman, by submitting the Complaint at: complaints@financialombudsman.gov.cy including all relevant information / documentation and supporting evidence. In such cases, the Compliance Officer shall cooperate fully and comply promptly with any settlements or awards made by the Financial Ombudsman.

Cyprus Securities and Exchange Commission

5.4. A Complainant can also contact CySEC, in case his / her Complaint is not resolved to their satisfaction.

5.5. CySEC Contact details: website: <http://www.cysec.gov.cy> or email: info@cysec.gov.cy.

6. Recording of complaints

6.1. The Company shall keep records of each Complaint and the measures taken for the Complaint's resolution for a period of five (5) years, or seven (7) years, if the CySEC requests so.

7. Regulatory Reporting of Clients' Complaints

7.1. Pursuant to the provisions stipulated in CySEC Circular C198 "Changes in the form regarding the submission of Complaints", ACC is required to keep detailed documentation on individual complaints as well as to submit a monthly report regarding the complaints received and the handling procedure of each complaint.

8. Legal Rights

8.1. The above Complaints Handling Procedure does not affect any legal rights of the Company or of the Client.

Should you have any questions, kindly email your request to the below email address:
compliance@alfacapital.com.cy
