



## Complaints or Grievances Policy

## 1. Introduction

Vstar& Soho Markets Limited ("the Company") is authorized and regulated by the Cyprus Securities and Exchange Commission ("CySEC") to act as a Cyprus Investment Firm ("CIF") with License Number .... The Company operates under the Provision of Investment Services, the Exercise of Investment Activities, the Operation of Regulated Markets and Other Related Matters Law 87(I)/2017, as amended from time to time.

## 2. General

As per the Law, a CIF is required to establish and implement an effective and transparent procedure to handle and resolve complaints or grievances received from its clients.

## 3. Complaint or grievance handling

The purpose of Complaints or grievances policy is to set out the procedure to be followed and the appropriate action required to be taken by Vstar& Soho Markets Limited (the "Company") in the case of a complaint by any client to ensure the Company's compliance with the applicable laws and regulations.

### Definitions

"Complainant" means any person, natural or legal, which is eligible for lodging a complaint to the Company and 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.

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

**In addition, the Company is required to:**

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

#### **4. Policy**

Clients' complaints or grievances are initially handled by the Back Office/Account Opening Department. However, the final settlement of non-trivial complaints or grievances needs to be reviewed by the Compliance Department and approved by the Senior Management.

A complainant shall complete the Complaint Form developed by the Company (available on Appendix 1 of this Policy). Once completed, it should be sent the following ways

- a) in a hard copy 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 head offices which are situated at .....
- b) by e-mail to [compliance@.....](mailto:compliance@.....)
- c) By Facsimile at: +357 25.....

A complaint shall be in written form and send through our normal Customer Support communication channels. A complaint received by a client shall include the following:

- a) the client's name and signature;
- b) the clients trading account number;
- c) the date the issue arose;
- d) the affected transaction numbers;
- e) description of the issue in a clear manner.

The complaint shall not include offensive language directed either to the Company or an employee. The Customer support has the right to contact directly the complainant for further clarifications in relation to the complaint. The Company will provide the Complainant with the unique reference number which will be used for all future communications between the Company and the

Complainant. The Company will investigate the complaint and a response to the complainant will be send within two (2) months. In the event the Company is unable to response within the time period mentioned above, the Complainant will be notified accordingly. In any case the period cannot exceed three (3) months from the date of submission of the complaint. In its final decision, the Company will provide the Complainant with the results along with a brief explanation of the reasons that lead to the decision. In the event the complainant is not satisfied he or she has the right to refer it to the Financial Ombudsman. Please note that you should contact the Financial Ombudsman of Cyprus no later than four (4) months after Company ought to have provided you with its final decision, otherwise the Financial Ombudsman of Cyprus may not be able to deal with your complaint. The Financial Ombudsman is an independent service for resolving disputes between CIF's and their clients. Information regarding this can be found below:

Address: 13 Lord Byron Avenue, 1096 NICOSIA

Telephone: 22848900

Fax: 22660584, 22660118

E-mail:

- Complaints: [complaints@financialombudsman.gov.cy](mailto:complaints@financialombudsman.gov.cy)
- Financial Ombudsman: [fin.ombudsman@financialombudsman.gov.cy](mailto:fin.ombudsman@financialombudsman.gov.cy)
- Website: [www.financialombudsman.gov.cy](http://www.financialombudsman.gov.cy)

In the event the complainant is not satisfied the last option is to refer the complaint to the Court in the Republic of Cyprus.

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

#### **5. Procedure to be followed when a formal complaint or grievance is received:**

The procedure which shall be followed by the Company, when handling clients' complaints or grievances, is the following:

- a) A complaint or grievance is initially handled by a member of the Back Office/Account Opening Department. The employee receiving the complaint or grievance shall take the necessary actions so that the complaint or grievance is properly addressed.

- b) The complaint or grievance in the form that has been received immediately (within three working days), should be forwarded to the head of the department where the complaint is addressed.
- c) The member of the Back Office/Account Opening Department shall send a written acknowledgement letter which contains the unique reference number and inform the complainant that the complaint or grievance is under investigation, and has been forwarded to the relevant department/personnel, providing all details so that the complainant is aware who is dealing with his/her complaint or grievance. Along with the letter, the Company's Handling of Clients' Complaints Policy shall be provided to the complainant free of charge.
- d) The member of staff, in addition to the above, should make all best efforts to ensure that in the case of the complaint or grievance 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 a case shall not:
1. Commit him/herself in any way to the client.
  2. Address any issues in relation to best execution.
  3. Address any issues relating to legal issues.
  4. Commit the Company in taking any action prior to examining the issues in a formal manner.

The Company sets 5 business days from the day the original complaint is received as a standard investigation period. If the investigation is complete in less than 10 business days, the complainant will be informed about the results of the investigation immediately upon its completion. However, if a complaint is not resolved within the standard investigation period, 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.

## **6. Complaints on an on-going basis**

The Compliance Officer in cooperation with the Head of Back Office will analyze on an on-going basis complaints handling data to make sure that they identify and address any recurring or systemic problems and potential operational risks.

This will include:

- Analyzing the causes of individual complaints so as 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 complained of; and
- Correcting, where reasonable to do so, such root causes.

## **7. Reporting of Complaints**

Information regarding the complaints received by the Company shall be disclosed to CySEC through the submission of Document COMP-CIF. The said Document is submitted in an electronic form to CySEC on a monthly basis.

Further to the provisions of Circular C198, the Company must submit the Document COMP-CIF, even if no complaints have been received during the reporting month or no update with regards to the existing complaints is applicable.

## **8. Record-keeping of complaints or grievances received**

The responsible department for the record keeping of complaints or grievances received is the Back Office / Account Opening Department. The Head of Back Office, or his designee, will keep a record of each complaint and the measures taken for the complaint's resolution. Monthly the Compliance Officer will review the Complaints file for the previous month in order to make sure the procedure as per the Law is followed and all the complaints have been resolved prior the submission of the relevant form to CySEC.

The complaint shall be registered once it is receiving on an internal archive and in an appropriate manner. The Head of Back Office, or his designee, shall maintain a central record of all complaints that includes the following information:

- name, address and account number (if available) of the complainant;
- date on which the complaint was received;

- department(s) involved the complaint investigation along with the names of the responsible employees;
- description of the nature of the complaint;
- disposition of the complaint.

The Company shall maintain all complaints or grievances for a minimum period of five years.

### **9. Accountability to CySEC**

Information regarding the complaints received by the Company shall be disclosed to CySEC through the submission of Document 144-002-01. The said Document is submitted in an electronic form to CySEC on a monthly basis.

Further to the provisions of Circular C198, the Company must submit the Document 144-002-01, even if no complaints have been received during the reporting month or no update with regards to the existing complaints is applicable

**Appendices: Complaint Form****COMPLAINT FORM**

No. of the Form:	
Client's Name:	
Account ID:	
Address:	
Email:	
Description:	
Date:	Signature:
<b><u>Please enclose any evidence and relevant documentation.</u></b>	
Submit the form to <a href="mailto:compliance@lt-markets.com">compliance@lt-markets.com</a> or fax at [00357 2575 2420] or at 2 Georgiou Neophytou Avenue, 1st Floor, Mesa Geitonia, 4006, Limassol, Cyprus.	
<b>Internal Use Only:</b>	
Employee handling the complaint:	
Position:	
Date of Receipt:	Date of response:
Result and Date of final resolution:	