

COMPLAINTS HANDLING POLICY

1. INTRODUCTION

HYCM (Europe) Ltd., (hereinafter “the Company”), is an investment firm regulated by the Cyprus Securities and Exchange Commission with license number 259/14.

This complaints procedure is provided to you in accordance with the provisions of the Cyprus Investment Services and Activities and Regulated Markets Law of 2007 and in accordance with the Markets in Financial Instrument Directive (MiFID) of the European Parliament and Council.

The operational procedures for the handling of complaints received by the Company are outlined in the Procedure Manual of Complaints (henceforward “the Manual”). The Manual is based on the Circular CI144-2012-05 of 5th March 2012, Circular C100 of 7th December 2015 and Directive DI144-2007-01, as amended, issued by the Cyprus Security and Exchange Commission and is included in the Internal Operations Manual of the Company.

The Procedure Manual for handling client’s complaints gathers all measures taken by the Company in order to solve potential inconveniences that might occur among the business relation.

The Company maintains effective and transparent procedures for reasonable prompt complaint handling for existing and potential retail clients, and keeps records of complaints and measures taken for complaint resolution. The Complaint Handling Policy enables complaints to be investigated fairly and possible conflicts of interests to be identified and mitigated.

2. DEFINITIONS

For the purposes of the present policy:

«**Complainant**» means any person, natural or legal, which is eligible for lodging a complaint to a CIF and who has already lodged a complaint.

«**Complaint**» means a statement of dissatisfaction addressed to a CIF by a complainant relating to the provision of investment services.

3. COMPLAINTS HANDLING

The Company is committed to promptly and efficiently handling all Client’s complaints or grievances. The procedures and records mentioned above shall be the responsibility of the Compliance Department. In cases where Client complaints or grievances are in relation to the Compliance Department, they will be handled by the Managing Director.

4. PROCEDURE

4.1 Filing a Complaint

Clients who wish to file a complaint may do so using any of the two following options:

- a) Informal Complaint through your “*Personal Account Manager*”. This is the fastest and most efficient way for the Company to handle any concerns or issues you may have. You can contact your Personal Account Manager either via Company’s Chat Service, or via phone, or in writing either letter or email.
- b) Formal Complaint through completing and submitting relevant Complaint Form. A Complaint Form may be submitted to the Company by
 - a. Email: complaints@hycm.com
 - b. Fax: 00357 25250139
 - c. Post to our business address as found on our Contact Us page.

4.2 Receiving a Complaint via the Complaint Form

As soon as a Client’s complaint is received, the Company will register it on an internal archive as quickly as possible and in an appropriate manner. For ease of reference and retrieval purposes the complaint will have a unique reference number. The unique reference number will be consisted of ten digits:

1. The first two is the code of the Company
2. The following four define the year
3. And the last four denote the number of each complaint serial number

The unique reference number will be communicated to the complainant.

The complainant should use the said reference number in all future communication with the Company, the Financial Ombudsman and/or the CySEC regarding the specific complaint.

At the same time the Company will notify the client about receiving his complaint in writing and within 72hrs or maximum within five (5) days. The information will include the name and job title of the person dealing with the complaint. The Compliance Officer is mainly responsible for handling customers complains or grievances and can be reached either at complaints@hycm.com or at 00357 25245750.

The Complaint form along with the current Complaint Handling Policy is available on the Company’s website

The Compliance Officer records the complaint in the customer’s complaint form which includes the following information:

- details of the client that made the complaint
- the service/department to which the complaint refers to
- the details of the employee responsible for the service/s rendered to the client,
- the organizational unit where the relevant employee belongs,
- the date of receipt and of registration of the complaint,
- the content of the complaint, in brief,

- the capital and the value of the financial instruments which belong to the client and are registered in his account,
- the magnitude of the damage which the client claims to have suffered or which can be presumed to have suffered on the basis of the contents of the complaint,
- the date and, briefly, the content of the Company's written response to the complaint lodged a reference to any correspondence exchanged between the Company and the client.

Upon receipt of the Complaint Form and after the client has been notified of the receipt of the complaint, the Compliance Officer shall:

- a) Gather and investigate all relevant evidence and information
- b) Communicate in a plain language which is clearly understood
- c) Provide a response within five (5) working days or maximum within two (2) months. In cases which a response could not be provided within the maximum expected timeframe, or if the remedy measure involves actions by other departments, then the Compliance Officer shall communicate the Client complaint or grievance to the Managing Director and should provide the complainant the reasons of the delay indicating an estimated time required for the investigation to be completed. This indicated timeframe will not exceed three (3) months from the submission of the complaint.

It is provided that during the investigation of the complaint the Compliance Officer will inform the complainant of the handling process of his/hers complaint.

- d) When providing a final decision that does not fully satisfy the complainant's demands, to notify in writing the complainant using a thorough explanation of its position on the complaint and set out the complainant's option to maintain the complaint e.g. through the Commission, the Financial Ombudsman, ADR Mechanism, or the relevant Courts.

Complainants who consider that they have any disputes with the Company, for which they are claiming damages, may consider to submit their complaint to the Financial Ombudsman.

Address: 13 Lord Byron Avenue, 1096 NICOSIA

Phone: 00357 22848900 (main number)

Facsimile (Fax): 00357 22660584, 00357 22660118

E-mail:

- Complaints: complaints@financialombudsman.gov.cy
- Financial Ombudsman: fin.ombudsman@financialombudsman.gov.cy
- Website: www.financialombudsman.gov.cy

It should be noted that CySEC has no restitution powers. Therefore, any complaints submitted to CYSEC are taken into consideration in the performance of its supervisory mandate. Any disputes for which damages are claimed, should be submitted to the Financial Ombudsman.

Complainants shall be able to file complaints and receive the above procedures for complaints free of charge.

5. RECORDS AND MEASURES

The Compliance Officer shall be responsible for documenting all complaints or grievances received by the Company. In this respect, the Compliance Officer shall establish a medium through which complaints or grievances and all relevant correspondence and documents related to complaints, are received and stored for a minimum period of five years.

The Company shall keep a record of each of the measures taken for the complaint's/grievance's resolution. One copy of the complaint form is archived in the client's file and another copy is kept in a separate file ("complain/grievance file")

The Managing Director shall inform the Board as well as the legal advisor of the Company of all Client complaints or grievances brought to him, at least annually.

When a complaint is brought to the Managing's Director attention, the Managing Director shall review carefully the details of the Client's complaint or grievance brought to him. Once the Managing Director understands fully the nature of the Client complaint or grievance, he may also communicate with the Client, to understand fully the nature and implications of the complaint or grievance, as applicable and shall investigate further until the Client complaint or grievance is satisfactorily resolved or handled, as applicable.

COMPLAINT FORM

Way of Communication: <input type="checkbox"/> FAX <input type="checkbox"/> Electronically <input type="checkbox"/> Telephone <input type="checkbox"/> Letter

Client details

Name:	Surname:
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Legal Entity Name:

Account Number:

Address:

Post Code:	City:	Country:
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Telephone Numbers:	Home:	Work:	Mobile:	Fax:
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Email:

Brief Summary of the Complaint

Description of product or service and/or department and/or employee you are complaining about (description, evidence, magnitude of damage and suggested way to be solved):
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Please enclose any other relevant documentation that may help us to handle the complaint.

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Signature:

Date:

For internal use only

Complaint received by:

Date of reception: / /

Reference number:

Department involved:

Employee involved:

Client capital:

Magnitude of the damage:

Acknowledgement sent within 48hrs: ___ Yes, ___ No Date: / /

If No, explain the reason:

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Final Response provided within 5 days: ___ Yes, ___ No Date: / /

If No, explain what further actions were taken:

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Signature of Compliance Officer: Date: / /