

HYCM (Europe) Ltd
Complaints Handling Policy
(version August 2018)

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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 2017 and in accordance with the Markets in Financial Instrument Directive (MiFID) of the European Parliament and Council.

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 HYCM and who has already lodged a complaint.

«**Complaint**» means a statement of dissatisfaction addressed to HYCM 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 as available on this Policy. 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

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 which 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 five (5) days. 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.

Upon receipt of the complaint 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 together with an explanation of HYCM's position and any remedy measures we intend to take (if applicable) within five (5) working days or maximum within two (2) months.
- d) In the event that the complaint requires further investigation and HYCM cannot resolve it within two (2) months, it will issue a holding response in writing or other durable medium. When a holding response is sent, it will indicate the causes of the delay and when the Company's investigation is likely to be completed. In any event, HYCM shall provide the complainant with the outcome of its investigation no later than one (1) month from the issuing of the holding response, depending on the complexity of the case and complainant's cooperation.

During the investigation of the complaint the Compliance Officer will inform the complainant of the handling process of his/hers complaint. It may be that one of HYCM's officers may contact the complainant directly (including communication by email or phone) in order to obtain, where needed, further clarifications and information relating to the complaint. We will require complainant's full cooperation in order to expedite the investigation and possible resolution of the complaint. *Please note that HYCM shall consider the complaint as closed and cease the relevant investigation in case complainant fail to respond to HYCM's officers within the period of three (3) months from the date of the submission of the complaint.*

5. FINAL DECISION

When HYCM's concludes its investigation, it will provide to the complainant a response together with an explanation of HYCM's position and any remedy measures it intends to take (if applicable).

If the Company provides a final decision that does not fully satisfy the complainant's demands, it will notify in writing complainant's option to maintain the complaint e.g. through the Commission, the Financial Ombudsman, ADR Mechanism, or the relevant Cypriot Courts.

6. SUBMISSION OF A COMPLAINT TO THE FINANCIAL OMBUDSMAN

Complainants who are dissatisfied with HYCM's resolution and wish to submit their complaint to the Financial Ombudsman should note the below

- ✓ The complaint / dispute / difference does not relate to an amount exceeding €170,000.00;
- ✓ The complaint should be submitted to the Financial Ombudsman within four (4) months from the date you receive HYCM's Final Response.
- ✓ No judgment has been issued from a Court for the same complaint or no judicial procedure is pending for the examination of the same complaint.
- ✓ Ensure that you copy your complaint's unique reference number when you address your formal complaint to the Financial Ombudsman using below contact details

Address: 13 Lord Byron Avenue, 1096 NICOSIA

Phone: 00357 22848900 (main number)

Fax: 00357 22660584, 00357 22660118

Complaints: complaints@financialombudsman.gov.cy

Financial Ombudsman: fin.ombudsman@financialombudsman.gov.cy

Website: www.financialombudsman.gov.cy

7. CYSEC'S POWERS

CySEC has no restitution powers and therefore does not investigate individual complaints. 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.

8. COST AND CHARGES

Complainants are able to file complaints and receive the above procedures for complaints free of charge but pay €20 fee when a complainant wishes to submit its complaint to Financial Ombudsman.

9. RECORDS AND MEASURES

The Compliance Officer is responsible for documenting all complaints or grievances received by the Company. In this respect, the Compliance Officer established 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.

We are required to submit information regarding the complaints we receive from our clients to CySEC, on a monthly basis. The Company keeps a record of each of the measures taken for the complaint's/grievance's resolution in accordance with the applicable laws and the Company's Data Protection and Privacy Policy.

The Managing Director shall inform the Board 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.

10. COMPLAINTS 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):

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

Signature:	Date:
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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:

.....

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: / /
