

## **COMPLAINTS PROCEDURE**

We aim to provide a high standard of investment services in order to serve our Clients' interests in the best possible way. However, we understand that despite our best efforts there may be instances where a Client may not be entirely satisfied. In such cases, every effort will be made to resolve any outstanding issues in a fair and speedy way.

This document outlines our procedure for the submission and handling of complaint or grievances of a Client by the Company in compliance with paragraph 13 of Directive DI 144-2007-01 of the Cyprus Securities and Exchange Commission (hereafter "CySEC") as a license Cypriot Investment Firm.

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 approved by Senior Management.

### **Complaint Submission**

Complaints can be addressed in writing via:

- Email to [info@pcmadvisers.com](mailto:info@pcmadvisers.com)
- Post at 56 Stadiou street, City Home 67, Block E, office 103, 2058 Strovolos, Nicosia, Cyprus
- Fax at +357 22 250 226

The complaint should contain:

- Full name
- Trading account number or ID
- Contact information
  - Contact email
  - Contact phone number
- Date of submission
- A description of the nature of the complaint

Complaints that do not contain the above mentioned information will not be accepted as not including these details hinders the investigation process

Upon acknowledgement of receipt of the complaint, no later than five (5) business day(s) from the submission the applicant will receive a unique reference number. The unique reference number should be used in all future contact with the Company, the Financial Ombudsman and/or CySEC regarding the specific complaint.

## **Complaint Handling**

Upon acknowledgement of receipt of the complaint, an officer will be assigning to review it carefully and investigate the circumstances surrounding the complaint and will try to resolve it without undue delay.

We shall make every effort to investigate your complaint and resolve it within two (2) months from issuing the unique reference number. Client will receive updates during the investigation process via email and can also request status update at any point of the process. The officer may contact the Client directly (including communication by email or phone) in order to obtain further clarifications and information relating to the complaint (where needed).

Please note that the Company will consider any complaint as closed, cease and resolved if the Client fails to respond to any communication from our officers within three (3) months from the issuing of the unique reference number. We strongly recommend the Clients full cooperation during the process in order to expedite the investigation and resolution of the complaint.

If we are unable to reach a conclusion within two (2) months, the Company will issue a holding response in writing or other durable medium stating the reasons for the delay and an estimated timeframe, no more than one (1) month, of completion.

## **Resolution**

When the process is completed, a communication will be send to the Client informing the results of the investigation along with details of the findings and actions to be taken (if any) in order to remedy the situation. All decisions are after the completions of three (3) months are final and the Company will not accept any disputes.

If the Client is not pleased with the resolution she/he may refer to the office of the Financial Ombudsman of the Republic of Cyprus to seek mediation for possible compensation within four (4) months from the day the Company issued the resolution. The Client can also refer to Financial Ombudsman in the unlikely event the Company was unable to provide a resolution within the timeframe specified.

The Client can also contact Cyprus Securities and Exchange Commission (CySEC) to further escalate the complaint, however please note that CySEC does not have restitution powers therefore it may not investigate the complaint.

### **A. Contact Details of the Financial Ombudsman of the Republic of Cyprus:**

- Website: <http://www.financialombudsman.gov.cy>
- Email: [complaints@financialombudsman.gov.cy](mailto:complaints@financialombudsman.gov.cy)
- Postal Address: P.O. BOX: 25735, 1311 Nicosia, Cyprus
- Telephone: +35722848900
- Fax: +35722660584, +35722660118

**B. Contact Details of the Cyprus Securities and Exchange Commission:**

- Website: <http://www.cysec.gov.cy>
- General email: [info@cysec.gov.cy](mailto:info@cysec.gov.cy)
- Postal Address: P.O. BOX 24996, 1306 Nicosia, Cyprus
- Telephone: +35722506600
- Fax: +35722506700

It is understood that your right to take legal action remains unaffected by the existence or use of any complaints procedures referred to above.

**Record Keeping**

All complaints are maintain in the Company records for five (5) years as well as reported to CySEC on monthly basis. Records consist of Client information, complaint details, investigation process details and resolution. In detail records consist of:

- Full name of the complainant
- Address of the complainant
- 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