COMPLAINTS PROCEDURE FOR CLIENTS

Last updated on December 2018

We, Broctagon Prime Ltd (the "Company"), have adopted this Complaints Procedure in order to ensure a fair and quick process for handling complaints that may arise from our relationship.

1. Submitting your Complaint

You may submit your complaint in writing and addressed to the Compliance Department of the Company who is authorized to handle and investigate complaints that may be submitted from our Clients.

Please use the relevant Complaints Form attached herein and submit it in any of the following ways:

- 1. By sending by post or delivering in person the attached Complaints Form at the following address: 2 Christou Samar, Morfo Court, Mesa Geitonia, 3rf Floor, 4001, Limassol Cyprus
- 2. By submitting the Complaints Form electronically at the following email address: compliance@broprime.com
- 3. By Facsimile at: +357 25 35 44 33

Once you successfully complete and submit your complaint, the Compliance Department of the Company shall handle and investigate your complaint.

2. Acknowledging your Complaint

We will acknowledge receipt of your complaint within five (5) days from the receipt of your complaint and provide you the <u>unique reference number</u> of your complaint. The unique reference number should be used in all your future contact with the Company, the Financial Ombudsman and/or CySEC regarding the specific complaint.

3. Handling of your Complaint

Once we acknowledge receipt of your complaint we will review it carefully, investigate the circumstances surrounding your complaint and will try to resolve it without undue delay. One of our officers may contact you directly (including communication by email or phone) in order to obtain further clarifications and information relating to your complaint. We shall need your cooperation in order to handle your complaint.

We shall make every effort to investigate your complaint and provide you with the outcome of our investigation within two (2) months from the date you have submitted your complaint to us. During the investigation process will keep you updated of the handling process of your complaint.

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In the event that your complaint requires further investigation and we cannot resolve it within two (2) months, we 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, we shall provide you with the outcome of our investigation no later than one (1) month from the issuing of the holding response, depending on the complexity of the case and your cooperation. Please note that the Company shall consider your complaint as closed and cease the relevant investigation in case you fail to respond to our officers within the period of three (3) months from the date of the submission of your complaint.

4. Final Decision

When we reach an outcome we will inform you of it together with an explanation of our position and any remedy measures we intend to take (if applicable).

If you are not satisfied with the Company's final decision you may submit your complaint to the Financial Ombudsman of the Republic of Cyprus and seek mediation for possible compensation. It is important that you contact the Financial Ombudsman of the Republic of Cyprus within four (4) months of receiving a final response from the Company otherwise the Financial Ombudsman of the Republic of Cyprus may not be able to deal with your complaint.

In the unlikely event that the Company was unable to provide you with a final response within the three (3) month time period specified above you may again contact the office of the Financial Ombudsman of the Republic of Cyprus no later than four (4) months after the date when we ought to have provided you with our final decision.

1. Contact Details of the Financial Ombudsman of the Republic of Cyprus:

Website: http://www.financialombudsman.gov.cy

Email: complaints@financialombudsman.gov.cy

Postal Address: P.O. BOX: 25735, 1311 Nicosia, Cyprus

Telephone: +35722848900

Fax: +35722660584, +3572266011

2. Contact Details of the Cyprus Securities and Exchange Commission:

Website: http://www.cysec.gov.cy

General email: info@cysec.gov.cy

Postal Address: P.O. BOX 24996, 1306 Nicosia, Cyprus

Telephone: +35722506600

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Fax: +35722506700

You may maintain your complaint with the Cyprus Securities and Exchange Commission, however please note that the Cyprus Securities and Exchange Commission does <u>not have restitution powers</u> and therefore does not investigate individual complaints.

Further information as to the procedure you need to follow can be found on https://www.cysec.gov.cy/enGB/complaints/how-to-complain/

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

COMPLAINTS FORM

Code:

Country:

This is the form the Complainant needs to fill in in order to submit the complaint to **Broctagon Prime Ltd** (the "Company"). Complete, up-to-date as well as accurate information is required to be provided to the Company for the proper investigation and evaluation of the complaint. The below Complaint Form is only indicative and not exhaustive. The Company may request further information and/or clarifications and/or evidence with regards to the complaint.

further information and/or clarifications and/or evidence with regards to the complaint. DATE: CLIENT INFORMATION Legal Entity Name (in case the Client is a legal person): Name of the Authorized Representative: Account Number: CONTACT DETAILS OF THE CLIENT Postal Address: City/Province:

Telephone Number:	
Email:	
DETAILS OF THE COMPLAINT	
Date when the Complaint was created:	
Employee who offered the services to the Client (if applicable):	
Description of the Complaint: (use a separate sheet if necessary)	
I hereby certify and confirm that to the best of my knowledge, the information furnished above is true, accurate, correct and complete.	
Signature	
For Official Use Only	
Received on:	Assigned to:
Received by:	Signature