

# COPLAINT HANDLING POLICY

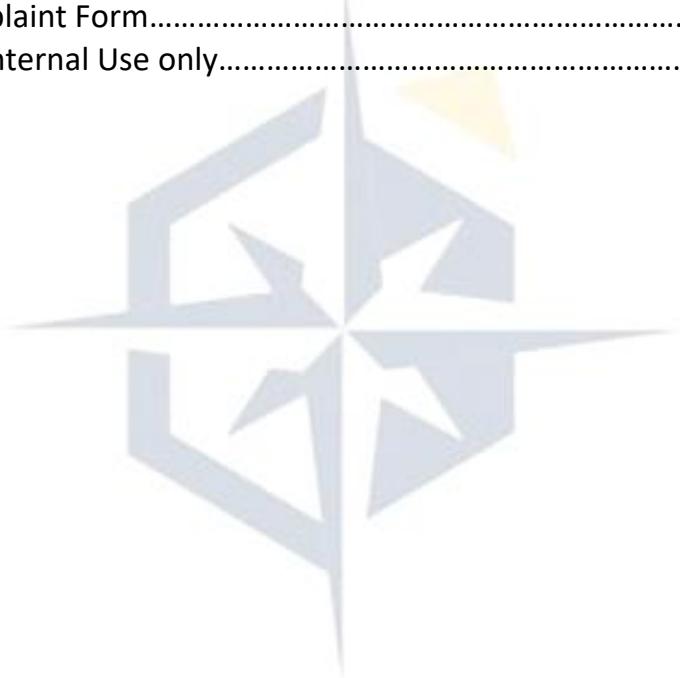


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## 1. Introduction

Magic Compass Ltd (hereinafter, "the Company"), is an Investment Firm regulated by the Cyprus Securities and Exchange Commission (hereinafter, "CySEC") with Licence number 299/16 and company registration number HE341562. The Company maintains effective and transparent procedures for the reasonable and prompt handling of Complaints.

## 2. Definition

A complaint is defined as a Client's (which may be an individual or a legal entity) articulation of dissatisfaction regarding the investment and/or related services provided by the Company.

A complainant is any individual, whether natural or legal, who is deemed qualified to have their complaint addressed by the firm and who has formally submitted a complaint.

## 3. Internal registry and Collection of Information

In order to investigate and resolve potential complaints received, the Company shall maintain an internal registry to collect and record the following information:

- Date of receipt and of registration of the complaint;
- Details of the client submitting the complaint, including:
  - *National Identification and/or Passport Number;*
  - *Country of Residence.*
- Content and reason of the complaint, including:
  - *The complaint cause;*
  - *The financial instrument involved;*
  - *The disputed amount;*
  - *The settlement date.*
- Service/department to which the complaint relates to;
- Details of the Company's employee responsible for the service(s) rendered to the client;
- Magnitude of the damage which the client claims to have suffered and/or which can be presumed to have suffered on the basis of the contents of the complaint;
- Date of Company's answer;
- The content of the Company's written response to the complaint lodged;
- Reference to any correspondence exchanged between the Company and the client which should be attached to the Company's file for internal recordkeeping requirements.

## 4. Submission of Complaint

A Client can submit a complaint via his registered email (i.e. same one used during registration procedure) to the Company's Compliance Department at [complaints@magiccompass.com](mailto:complaints@magiccompass.com) which is the responsible department for handling complaints by completing the '**Client Complaint Form**' attached herein or via post at

**Magic Compass Ltd, Sarlo 9, Agios Athanasios, 4106, Limassol, Cyprus.** The Company reserves the right to refuse investigating a client's complaint if the Client provides false information.

The Company maintains the authority to designate and classify a notice submitted by a Client as an enquiry instead of a complaint if the notice does not meet the aforementioned definition of 'Complaint.' Such notices will be directed to the appropriate department for proper handling. The Client retains the right to request the reclassification of their enquiry as a complaint, provided that they present reasonable grounds for such a reclassification to the Company..

## 5. Complaint Handling Procedure

The Compliance Department is responsible for effectively managing any complaints submitted by complainants and will adhere to the following procedure when addressing these complaints: Within 48 hours of receiving a complaint, the Company will issue an acknowledgment email that includes a unique reference number associated with that complaint. The unique reference number should be used by the Client in any and all future correspondence with the Company, the Financial Ombudsman Service and/or CySEC.

- Within four (4) weeks from the date of receipt of the acknowledgment email by the Client, the Company will provide the Client with a final or holding response.
- If a holding response is sent to the Client, the Company will provide an explanation as to the reasons why the Company has not been able to resolve the complaint and an indication of the time needed to resolve the issue.
- If a final response is sent to the Client, the Company will provide explanations on the findings of the investigation.
- The Company shall document and keep in its records the following information:
  1. the identity of the complainant who filed the complaint
  2. the name of the employee who undertook to provide the service to the complainant
  3. the date of receipt of complaint/enquiry
  4. the subject and full description of the complaint/enquiry

In case where the Client is not satisfied with the outcome based on the Company's final response then the Client can refer his complaint along with the unique reference number and a copy of the Company's final response, to the Financial Ombudsman, the Cyprus Securities and Exchange Commission (the 'CySEC') or the relevant courts.

Further information about the procedures for communicating with the Financial Ombudsman of the Republic of Cyprus:

Website: [www.financialombudsman.gov.cy](http://www.financialombudsman.gov.cy)

Email: [complaints@financialombudsman.gov.cy](mailto:complaints@financialombudsman.gov.cy)

Postal Address: PO BOX: 25735, 1311 Nicosia, Cyprus Telephone: +35722848900

Should the Clients not be satisfied with the outcome with the Financial Ombudsman in Cyprus he can escalate it to the **CySEC**:

Website: [www.cysec.gov.cy](http://www.cysec.gov.cy)

Email: [info@cysec.gov.cy](mailto:info@cysec.gov.cy)

Postal Address: PO BOX: 24996, 1306 Nicosia, Cyprus

Telephone: +35722506600

## 6. Internal Analysis and correction of Complaints

It shall be the responsibility of the Compliance Department to analyse, on an ongoing basis, complaint-handling data to ensure that recurring or systemic problems and potential legal and operational risks are identified and addressed. Such analysis shall include the causes of complaints so as to identify root causes common to such types of complaints. The root causes shall then be considered to determine whether they may affect other processes or products, including those not directly complained of. Magic Compass Ltd shall ensure that root causes are corrected, where reasonable.

## 7. Record Keeping

All decisions related to complaints shall be communicated to complainants in writing and copies shall be retained by the Compliance Department. All the documentation related to complaints shall be maintained for a period of at least five (5) years calculated after the execution of the complaint and/or termination of the business relationship with the Client.

## CLIENT COMPLAINT FORM

a) Clients Information:

<b>Full Name:</b>	<b>Account Number:</b>	
<b>Address:</b>		
<b>Post Code:</b>	<b>City:</b>	<b>Country:</b>
<b>Telephone Number:</b>	<b>Mobile Number:</b>	<b>Email:</b>

b) Brief Summary of the Complaint:

**Please describe the product or service and/or department and/or employee you are complaining about (description, supporting evidence, amount/damage and suggested resolving measures):**

**\*(In case additional space is required, please use additional document as appendix of this form)**  
**\*\*(Please enclose any relevant documentation/evidence that may help us to handle your complaint.)**

Client Signature:

Date:

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<b>Complaint Received by:</b>	<b>Date Received:</b>
<b>Unique Reference No:</b>	
<b>Department Involved (if applicable):</b>	<b>Employee Involved (If Applicable):</b>
<b>Acknowledgement Email within 48 hours:</b> <input type="checkbox"/> <b>YES</b> <input type="checkbox"/> <b>NO</b>	
<b>Date of Acknowledgment Email:</b>	
<b>Final Response to Client within 4 weeks:</b> <input type="checkbox"/> <b>YES</b> <input type="checkbox"/> <b>NO</b>	
<b>Date of Final Response:</b>	
<b>Actions Taken as per Final Response:</b>	
<b>Holding Response to Client:</b> <input type="checkbox"/> <b>YES</b> <input type="checkbox"/> <b>NO</b>	
<b>Date of Holding Response:</b>	
<b>Actions Taken as per Holding Response:</b>	
<b>Settlement of Complaint:</b> <input type="checkbox"/> <b>YES</b> <input type="checkbox"/> <b>NO</b>	
<b>Settlement Date:</b>	<b>Settlement Amount:</b>
<b>Responsible Officer's Name:</b>	
<b>Signature</b>	<b>Date</b>