

COMPLAINTS HANDLING POLICY

Created in accordance with Paragraph 13 of Directive 144-2007-01 2012

When a MeritKapital employee is the recipient of a complaint directed to them, another employee or MK in its entirety, the following steps must be followed:

- 1. Complete a Client Complaint form which requests the following information:**
 - The complainant's name and email address
 - Mode of receipt of complaint
 - Date the complaint was received
 - Detailed summary of the complaint
 - Name of the employee who received the complaint
 - Action already taken/intended actions
- 2. In all circumstances of a received complaint, contact should be made with the complainant within 24 hours to acknowledge receipt of complaint.**
 - MK shall inform the relevant client with written information regarding their complaints handling process.
 - If urgent action is required, this should be implemented immediately and communicated to the client.
 - Response must be written in clear and plain language
 - MK must inform the client that (if applicable) they can contact the Commission or the Financial Ombudsman or ADR mechanism or the relevant court.
- 3. A Client Complaint Form must be attached to the front of the client file until the issue has been resolved.**
- 4. Send a follow up email (if complaint remains unresolved) to update the complainant of the measures already taken to investigate the complaint and an estimated time frame for the resolution of the issue(s).**
 - In cases where a response could not be provided within the three day timeframe, MK employees should provide the complainant with the reasons for the delay and indicate an estimated time frame for the investigation to be completed.
- 5. If the complaint is of a serious nature, the complaint must be forwarded to MK's Complaints Handling Officer**

6. Within **three working days**, provide an adequate **resolution** to the complaint detailing in full the investigative steps taken to resolve the complaint.
7. The Complaint Form as well as a resolution summary must be saved in the MeritKapital 'Complaints' folder.
8. Plan of action to be discussed with colleagues implementing preventative measures to ensure the issue does not reoccur
9. In the event that the complainant is **not** satisfied with the response, MK employees must explain that the complainant has the right to report their complaint to the Financial Ombudsman or the relevant courts.

Further Notes

- Every month, the Complaints Handling Officer must submit a form detailing any received complaints to CySEC in accordance with Circular C100 which can be located in the Complaint Handling Folder.
- All complaints must be listed in the internal archive (excel doc) which can be located in the Complaint Handling folder.

Please refer to the attachments below - Appendixes 1 and 2:

- **Appendix 1 - SUBMITTING A COMPLAINT- GUIDANCE FOR CLIENTS;**
- **Appendix 2 - Complaint Form.**

SUBMITTING A COMPLAINT- GUIDANCE FOR CLIENTS

If a client feels dissatisfied with the service received from MeritKapital and wishes to lodge a complaint, a client can do so in the following ways:

By email: info@meritkapital.com

If sending a complaint via email, the client must title the subject of the email 'Complaint' and explain the complaint.

By telephone: +357 25 85 79 00

If wishing to complain via telephone, the Client must detail who in the business they have been in correspondence with and the reasons for their complaint.

By letter

If wishing to write a complaint in the form of a letter, the client should write to the registered address of MeritKapital:

**MeritKapital Limited
Eftapaton Court
256 Makarios Avenue
CY-3105 Limassol Cyprus
P.O Box 53180**

In all circumstances, the client should provide details of the following:

- (i) The relevant product/service to which the complaint relates
- (ii) The date of last correspondence with an MK employee and the name of that employee
- (iii) A detailed summary of the events leading up to a complaint
- (iv) Expected resolutions/outcomes to rectify the situation

The client must be aware that there is no charge for submitting a complaint and the client holds the right at any time, to refer their complaint to the Financial Ombudsman Service, the Commission, ADR mechanism or the relevant court.

In all situations MeritKapital will aim to acknowledge receipt of complaint within 24 hours and detail the steps to be taken to investigate and research the issue in question.

MeritKapital sets a three-working day timeframe to adequately investigate and provide a detailed and thorough response and where necessary, a resolution. In the unlikely event that MeritKapital cannot respond within this period, a MeritKapital employee will explain the reasons for the delay and an estimated resolution date.

Complaint Form

Name of Client:

File Number:

Date:

Complaint received by:

Details of Complaint:

Urgent action required? If yes, detail below:

Acknowledged complaint within 24 hours and

informed client of initial actions taken:

Yes

No

Three day follow-up with a resolution and/or further action taken: