



Complaints Policy

Previous Version Date:	September 2017
Current Version:	October 2018
Approved by:	Board of Directors

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1 INTRODUCTION

Leverate Financial Services Ltd (the "Company") is a Cypriot Investment Firm ("CIF") regulated by the Cyprus Securities and Exchange Commission ("CySEC") with licence number 160/11. The Company in line with its regulatory and legal obligations has implemented this Client Complaint Policy (the "Policy") and the corresponding procedure described below for the prompt handling of clients' or potential clients' complaints in relation to their dissatisfaction with investment services provided by the Company. Clients' or potential clients' complaints are handled effectively and in an independent manner by the Compliance Department of the Company.

2 PROCEDURE

The procedure for submission and investigation of a Complaint is as follows:

- a) The Client or potential client accesses the online Complaint Form which is found on the Company's website;
- b) The Client or potential client can download and complete the relevant information required for the submission of the Complaint Form and submits the Complaint Form either online (where such functionality is available) or sends the Complaints Form to the Compliance Department at complaints@leverate.com or by post at 88 Ayias Fylaxeos street, Zavos City Center, 4th Floor, 401, Limassol 3025, Cyprus - P.O.B. 56942 Cyprus 3311, with all supporting documentation necessary for the investigation of the complaint. The submission and investigation of a Complaint is free of charge;
- c) The Compliance Department upon receiving a complaint, it registers it in an internal register and allocates it a unique reference number. The unique reference number is communicated to the Client or potential client along with the acknowledgement of receipt of the complaint within five (5) days from receipt of the complaint by the Compliance Department. Clients or potential clients should use this unique reference number for all correspondence in relation to the complaint with the Company and where applicable with the Financial Ombudsman and/or CySEC in line with subsection e) below.
- d) The Compliance Department investigates and communicates to the Client or potential client the outcome of its investigation within two (2) months from receipt of the complaint. In the event that the Compliance Department is unable to respond within two (2) months, it shall inform the Client or potential client of the reasons for the delay and indicate the period of time within it is possible to complete the investigation, which in any event shall not exceed in total, three (3) months from the date of receipt of the Complaint.
- e) If the Client or potential client is not satisfied with the outcome of the investigation of the complaint or if the Compliance Department has not replied within three (3) months from receipt of the complaint, the Client or potential client can submit a complaint to the Financial Ombudsman of the Republic of Cyprus (the "Ombudsman") in the manner and subject to the requirements specified in the Complaints Form found on the Ombudsman's [website](#).

- f) If the Client or potential client is not satisfied by the decision of the Ombudsman then he/she may take the matter to the competent court.

Further information on the procedure for submission of complaints can be found on CySEC's [website](#).

The Company requires the following information in order to investigate a complaint in line with this Policy:

- Full name;
- Account number;
- Address;
- E-mail;
- Telephone number;
- Description of the Complaint.

3 RECORD KEEPING

The Company in line with its legal and regulatory obligations is obliged to keep records including of every complaint submitted by Clients or potential clients for a minimum period of five (5) years or where requested by CySEC, for a period of up to seven (7) years.

4 CONTACTS

For any questions regarding this Policy please contact by e-mail the Compliance Department at complaints@leverate.com or by post at 88 Ayias Fylaxeos street, Zavos City Center, 4th Floor, 401, Limassol 3025, Cyprus - P.O.B. 56942 Cyprus 3311.