

## CUSTOMER COMPLAINT PROCEDURE

“**COMPLAINT**” means a statement of dissatisfaction relating to the provision of investment services received from a Client by fax and / or by email in format of fully completed Client’s Complaints Form.

“**GRIEVANCES**” - minor issues brought up by the clients or potential clients arising from the ordinary course of business, arising from merely temporary delays, misunderstanding or need for additional clarification, not leading to the material losses, and resolved immediately to the client’s satisfaction on the departmental level, shall not be considered as "complaint", unless the client / potential client remains unsatisfied by the explanation and/or offered solution to the problem, and follows official Procedure as described in client agreement and /or on the Company website.

However, the Company’s staff is encourage to make a note for such situations and report these incidents to the management, in order to improve the level of Company’s services.

All clients complaints will be received by the Back-Office department and/ or Compliance Officer or directly by the Executive Director. The complaint form should be submitted by:

- E-mail: [info@skanestas.com](mailto:info@skanestas.com)
- Fax: +357 25 212 293

The Company maintains effective and transparent procedures for the reasonable and prompt handling complaints received from clients or potential clients, and keeps records of each complaint and the measures taken for the complaint’s resolution. Such procedures and records is the responsibility of the Head of Back-Office department.

*The following information will be documented for complaints received:*

- the identity of the Client who filed the complaint
- the identity of the employee that undertook to provide the service to the Client
- the department to which the relevant employee relates to
- the date of receipt of the complaint
- the details of the complaint or grievance – in brief
- the extent in financial terms of the potential loss that the Client claims has suffered
- the date and in summary, the content of the reply of the Company to the said complaint or grievance
- reference to any correspondence exchanged between the Company and the Client. Such correspondence will be attached to the file.

Upon receipt of a client complaint, the Head of Back-Office department will send an initial response letter to the complainant within 5 (five) business days of receipt of the complaint, where the unique reference number will be communicated to the complainant. The complainant should use the said reference number in the future contact with the Company, the Financial Ombudsman and/or Cyprus Securities and Exchange Commission regarding the specific complaint.

The Company will investigate the complaint and reply, within 2 (two) months, to the complainant about it’s final decision.

In the event that the Company is unable to respond within 2 (two) months, it will inform the complainant of the reasons for delay and indicate the period of time within it is possible to complete the investigation. This period of time cannot exceed 3 (three) months from the submission of the complaint.

**CUSTOMER COMPLAINT FORM**

Please use this form to file a complaint with Skanestas Investments Limited. We require a written complaint from the owner of the account(s) in question, indicating the subject of the complaint, the issues involved and specific information regarding times, dates and events. While an individual may file a complaint on behalf of someone else, we require written authorization from the owner of the account in order to proceed with our review of the complaint.

**1. Customer Information**

Mr./Mrs./Ms./Miss/Dr. \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ Province: \_\_\_\_\_ Postal Code: \_\_\_\_\_

Home Telephone: ( ) \_\_\_\_\_ Business Telephone: ( ) \_\_\_\_\_

Fax Number: ( ) \_\_\_\_\_ E-Mail Address: \_\_\_\_\_

Preferred time and telephone number to be contacted: \_\_\_\_\_

**2. Your Account Information**

Name of Registered Representative: \_\_\_\_\_

Account Number: \_\_\_\_\_ Account Type: \_\_\_\_\_

Account Number: \_\_\_\_\_ Account Type: \_\_\_\_\_

**3. Does your complaint involve a particular investment?**

If yes, please provide the name of the security and applicable date in the space provided below.

Name of Security: \_\_\_\_\_ Date: \_\_\_\_\_

Name of Security: \_\_\_\_\_ Date: \_\_\_\_\_

**4. Complaint Summary**

Please provide a complete chronological summary of your complaint. Attach additional sheets as required. Further details may be requested from you later in the complaint process.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**5. Your Signature**

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## **NOT SATISFIED WITH THE OUTCOME OF A COMPLAINT?**

If you are dissatisfied with our final response, you can either ask us to reconsider or you can refer the matter to the Financial Ombudsman Service or Cyprus Securities and Exchange Commission (see details below).

### **Referral of unresolved complaint to the Financial Ombudsman**

If you are an individual, or a legal entity, trust or charitable entity that can be categorized as a consumer under the legislation governing the creation and operation of an Alternative Dispute Resolution framework in Cyprus (Financial Ombudsman), you are entitled to escalate a complaint to the Financial Ombudsman if the solution or action taken/provided by the Company is not to your satisfaction.

A complaint to the Financial Ombudsman should be filed within 4 (four) months from the receipt of the response from the Company if you are not satisfied with the resolution or if the Company does not respond at all.

The Financial Ombudsman can be contacted at:

- Address: 13 Lord Byron Avenue, 1096 NICOSIA
- Phone: 22848900 (main number)
- Fax: 22660584, 22660118
- E-mail Complaints: [complaints@financialombudsman.gov.cy](mailto:complaints@financialombudsman.gov.cy)
- Financial Ombudsman: [fin.ombudsman@financialombudsman.gov.cy](mailto:fin.ombudsman@financialombudsman.gov.cy)

The complaint form shall be accompanied by the evidence of the paid fee (€20).

The payment can be done at any of the following banks:

(α) Συνεργατική Κεντρική Τράπεζα ή Συνεργατικό Πιστωτικό Ίδρυμα,  
IBAN: CY16 0070 1010 0000 0000 4002 8214

(β) Ελληνική Τράπεζα, IBAN: CY78 0050 0109 0001 0901 7087 6401

(γ) Τράπεζα Κύπρου, IBAN: CY52 0020 0195 0000 3570 1944 4789

For more information, please visit the website ([www.financialombudsman.gov.cy](http://www.financialombudsman.gov.cy)).

### **Referral of unresolved complaint to Cyprus Securities and Exchange Commission (CySEC)**

You also may send your complaint to CySEC through the following website:

<http://www.cysec.gov.cy/en-GB/complaints/cifs/>

Please note that CySEC does not investigate individual complaints as it does not have restitution powers. However all complaints submitted to the CySEC are taken into consideration by the CySEC in the performance of its supervisory mandate.