



# COMPLAINT HANDLING: CLIENT COMPLAINT PROCEDURE AND COMPLAINT FORM

Reference no. 14a

## VERSION CONTROL

Version	Date	Author	Apply	Changes
1.0	11.12.2018	Board of Directors	All clients, all employees, all directors	n/a
2.0	14.10.2021	Board of Directors	All clients, all employees, all directors	update

## CLIENT COMPLAINT PROCEDURE

If you have a complaint, it is best to first ask the SKANESTAS INVESTMENTS LIMITED (the “Company”, “CIF”) involved to put things right.

### Definitions

“COMPLAINT” means a statement of dissatisfaction relating to the provision of investment services received from a Client by post, 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 the official Procedure as described in this document , the relevant client agreement(s) and /or on the Company website.

### Procedure

All clients complaints will be received by the Company’s complaints management function. The complaint form should be submitted by:

- E-mail: [info@skanestas.com](mailto:info@skanestas.com);
- Fax: +357 25 253 640
- Registered address: Arch. Makariou III, 226, first floor, 3030 Limassol, Cyprus.

The Company will give you a unique reference number. This unique number reference will be used for all future communication you will have with the Company and/or the Financial Ombudsman and/or with CySEC regarding your complaint.

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 the latest, to the complainant about its 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. During the investigation process, the Company will keep you updated of the handling process of your complaint. 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 will require your full cooperation in order to expedite the investigation and possible resolution of your complaint.

The Company shall maintain a record of all complaints and related details for a minimum period of five years in accordance with the applicable legislation.

Client Complaint form is attached herewith.



## CLIENT 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 of transaction 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.

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### 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 either the receipt of the final response from the Company if you are not satisfied with the resolution or the deadline of the three-month period during which the Company had to respond to you but did 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) Hellenic Bank

IBAN: CY32 0050 0143 0001 4301 G437 0501      Swift Code & BIC Code: HEBACY2N

(β) Hellenic Bank

IBAN: CY78 0050 0109 0001 0901 7087 6401      Swift Code & BIC Code: HEBACY2N

(γ) Bank of Cyprus

IBAN: CY52 0020 0195 0000 3570 1944 4789      Swift Code & BIC Code: BCYPCY2N

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:

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

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.