



Client Complaints Policy

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Table of Contents

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|---|---|
| 1. INTRODUCTION | 3 |
| 2. SCOPE AND OBJECTIVE..... | 3 |
| 3. LEGAL FRAMEWORK | 3 |
| 4. HOW TO LODGE A COMPLAINT | 3 |
| 5. INFORMATION REQUIRED | 3 |
| 6. COMPLAINT HANDLING PROCEDURE | 4 |
| 7. APPLICATION AND RECORD KEEPING..... | 4 |
| 8. ESCALATION | 4 |
| 9. COMPLAINTS MANAGEMENT FUNCTION | 5 |
| 10. COMPLAINTS MANAGEMENT PROCESS | 5 |
| 11. INVESTIGATION PROCESS AND INFORMING THE COMPLAINANT | 6 |
| 12. REPORTING TO CYSEC..... | 6 |
| 13. POLICY VIOLATION..... | 7 |
| 14. TRAINING | 7 |
| 15. CLIENTS COMPLAINTS POLICY UPDATE | 7 |
| 16. APPENDIX I: CLIENT COMPLAINT FORM | 7 |

1. Introduction

Hoxton Capital Management (Europe) Ltd (hereinafter referred to as "the Company") is committed to providing the highest level of service to its clients. This Client Complaint Policy outlines the procedures that the Company follows to ensure that any client complaints are handled in a fair, prompt, and efficient manner, in compliance with the regulatory requirements of the Cyprus Securities and Exchange Commission (CySEC).

Definition of a Complaint

A complaint is an expression of dissatisfaction by a client regarding the provision of investment services or ancillary services provided by the Company.

2. Scope and Objective

Hoxton Capital Management (Europe) Ltd is a private company registered in Cyprus (Reg. No. HE417287) (hereinafter the "Company") and is authorized and regulated by the Cyprus Securities and Exchange Commission (CySEC) to operate as a Cyprus Investment Firm (CIF) for the provision of investment services, under CIF number 432/23. The purpose of this Complaints Handling Policy is to describe the appropriate actions to be taken by the Company for the resolution of complaints without undue delay, taking into consideration the seriousness of the complaint as well as the financial implications this may have on both the client and the Company. Where circumstances are not covered by this policy, one should seek the input and guidance from the Company's Compliance function and/or the Board of Directors of the Company. It is the Company's policy not to accept retail clients. The Company reserves that where the regulatory framework defines the procedures in relation to complaints procedures for retail clients, the present policy is applicable to complaints that may be received from professional clients or eligible counterparties. For clarification purposes, a "complaint" is defined as any expression of dissatisfaction, whether made orally or in writing, whether justified or not, and regardless of whether it appears to be a serious matter, from or on behalf of a complainant, about the Company's provision or failure to provide its services. It is noted that requests for information, opinions, clarification, services, or benefits are not considered complaints.

3. Legal Framework

The Company is required to establish, implement, and maintain effective and transparent complaints handling procedures for efficient, consistent, and prompt handling of complaints or grievances received from clients, and to keep a record of each complaint or grievance and the measures taken for the complaint's resolution in accordance with the applicable legal framework.

4. How to Lodge a Complaint

Clients may lodge a complaint through the following channels:

- By Mail: Hoxton Capital Management (Europe) Ltd
Mesogiou 15, Upper Floor, 7041, Larnaca, Cyprus
- By Telephone +35724332522
- By Email complaints@hoxtoncapital.eu

5. Information Required

To help us address your complaint effectively, please provide the following information:

- Your full name and contact details (including a daytime phone number and email address)
- Your account number or other relevant reference
- A clear description of your complaint
- Copies of any documentation supporting your complaint
- Any other details you believe are relevant

6. Complaint Handling Procedure

1. Acknowledgment

Upon receipt of the complaint, the Company will send an acknowledgment within five (5) business days, confirming that the complaint has been received and is being reviewed.

2. Investigation

The complaint will be investigated by the Compliance Officer, who is independent of the issue being complained about. The investigation will be thorough, fair, and impartial.

3. Response

The Company aims to resolve all complaints within two (2) months. If more time is needed, the client will be informed about the reasons for the delay and provided with an estimated timeframe for resolution.

4. Resolution

Once the investigation is complete, the Company will provide a written response detailing the outcome of the investigation and any remedial actions to be taken, if applicable.

7. Application and Record Keeping

In accordance with the applicable legal framework, the Company shall take all appropriate measures and actions to ensure that it adheres to the detailed requirements for the maintenance of an internal complaints register and the timeframes for investigating and responding to the clients. The Compliance and AML Officer, who is responsible for the processing and resolution of client complaints, maintains a complaints book/register (the “Complaints Book”) which includes the following information:

- Details/Identity of the complainant that made the complaint;
- Contact details of the complainant;
- Unique reference number assigned to the complaint;
- Service/department to which the complaint refers;
- Details of the Company’s employee responsible for the service(s) rendered to the complainant;
- Organizational unit to which the relevant employee belongs;
- Date of receipt and of registration of the complaint;
- Date that the incident took place regarding the complaint of the client;
- Content of the complaint, in brief;
- Magnitude of the damage which the complainant claims to have suffered or which can be presumed to have been suffered based on the contents of the complaint;
- Date and, briefly, the content of the Company’s written response to the complaint lodged;
- Reference to any correspondence exchanged between the Company and the complainant which should be attached to the Company’s file;
- Measures taken for the resolution of the complaint;
- Amount that was paid to the investor, in case the complaint was resolved (settlement amount) (if applicable);
- Employee who dealt with the complaint.

The above records for each complaint should be retained in the Company’s Complaints Book for at least five (5) years.

8. Escalation

If you are not satisfied with the Company’s final response, you may refer your complaint to the Cyprus Securities and Exchange Commission (CySEC):

- By Mail: Cyprus Securities and Exchange Commission
19 Diagorou Street, 1097 Nicosia, Cyprus
- By Fax: +35722506700
- By Email: complaints@cysec.gov.cy

9. Complaints Management Function

The Company maintains a complaints management process, defined and endorsed by the Senior Management and the Board, who are responsible for its implementation and for monitoring the Company's compliance with it. The Internal Auditor supervises the implementation of the Company's policy and procedures regarding Client Complaints or Grievances.

The Company always commits adequate resources for complaints handling with sufficient levels of delegated authority. Complaints will be investigated fairly, unbiasedly, and independently. For the avoidance of any conflicts of interest, the Company delegates the duties for handling and resolving complaints or grievances to employees not involved in the provision of investment services.

All complaints are handled by the Company's Administration/Back Office Department. The Head of Administration/Back Office Department is responsible for coordinating the different departments of the Company for the proper and timely handling of every complaint or grievance and acts under the supervision and guidance of the Company's Senior Management.

The Head of Administration/Back Office Department has authority and access to all departments of the Company to properly investigate complaints. Depending on the investigation's outcome, the Back Office Department consults with the Company's Senior Management and initiates formal discussions with the claimant for the complaint's resolution. The Head of Back Office Department has the authority to offer resolutions up to an amount decided by the Company's Senior Management on a case-by-case basis.

10. Complaints Management Process

The process for handling clients' complaints established, implemented, and maintained by the Company should:

- Be simple and clear
- Ensure that customers are treated fairly
- Be effective and aid decision making
- Ensure fair outcomes

The complaints handling arrangements established by the Company should be known and easily accessible to clients.

Complaints handling should be made without undue delay, considering the seriousness of the complaint and the extent of economic impact arising from the content of the complaint, both for the client and the Company. The Company is required to examine all complaints received from clients and inform them of the outcome. The Company shall register the complaints it receives as soon as possible, in an internal register with an appropriate manner, for easy reference and retrieval. Upon receiving the complaint, the Company will register it directly to an internal register, giving it a unique reference number which will be communicated to the complainant too.

The following details have to be documented:

- The identity of the client who filed the complaint or grievance
- The identity of the employee that undertook to provide the service to the client
- The department to which the relevant employee relates
- The date of receipt of the complaint or grievance
- The details of the complaint or grievance – full description
- The extent in financial terms of the potential loss that the client claims to have suffered
- The date and in summary, the content of the reply of the Company to the said complaint or grievance

Every month, the Company shall provide CySEC information regarding the complaints it receives and how these are being handled. The Company shall complete every month the relevant Form and submit it to CySEC in electronic form through TRS, within five (5) days after the reporting month. If the Company did not receive any complaint within the reporting month, it shall have no obligation to submit the relevant Form to CySEC.

The Company shall analyze, on an on-going basis, complaints handling data to identify and address any recurring or systemic problems, and potential legal and operational risks, by:

- Analyzing the causes of individual complaints to identify root causes common to types of complaints

- Considering whether such root causes also affect other processes or financial means, including those not directly complained of

- Correcting, where reasonable to do so, such root causes

On request or when acknowledging receipt of a complaint, the Company shall provide written information regarding its complaints-handling process. The Company shall confirm, within five (5) days, the receipt of the complaint to the complainant.

The Company shall publish details of its complaints-handling process in an easily accessible manner (e.g., in brochures, pamphlets, contractual documents, or via the Company's website).

The Company shall provide clear, accurate, and up-to-date information about the complaints-handling process which includes:

- Information on how to lodge a complaint (e.g., the type of information to be provided by the complainant, the identity, and contact details of the person or department to whom the complaints should be directed)

- The process that will be followed when handling a complaint (e.g., when the complaint will be acknowledged, indicative handling time, the availability (where applicable) to contact CySEC, ADR mechanism, or the relevant Courts)

11. Investigation Process and Informing the Complainant

The Compliance and AML Officer confirms within five (5) days, the receipt of the complaint to the complainant.

The Compliance and AML Officer investigates the complaint and replies, within two (2) months, to the complainant about the outcome/decision. During the investigation of the complaint, the Company informs the complainant of the handling process of his/her complaint.

All complaints submitted in accordance with section 5, must be investigated with due care and the Company should make every effort to provide the client with a written response within two months of the receipt of the complaint. The Company shall communicate to clients in plain language that is clearly understood and provide a response to the complaint without any unnecessary delay. In the event that the Company is unable to respond within two months, it informs the complainant of the reasons for the delay and indicates the period of time within which it is possible to complete the investigation. This period cannot exceed three (3) months from the complaint's submission.

In the event that a resolution is impossible within the timeframe of three (3) months, a letter should be sent to the client three (3) months after the receipt of the formal complaint with information on the procedure to be followed. In the event that a complaint has been resolved, the Company should take every action to ensure that the client is satisfied and that the client's satisfaction is recorded.

Once the issue is resolved, all relevant documents are sent to the Compliance/AML Officer for archiving and the Board of Directors is informed accordingly. In addition, the Company should analyze, on an on-going basis, complaints-handling data, in order to ensure that it identifies and addresses any recurring problems and potential legal and operational risks, for example, by:

- Analyzing the causes of individual complaints so as to identify the root causes common to each type of complaint;

- Considering whether such root causes may also affect other processes, including those not directly referred to in a complaint; and

- Correcting, where reasonable to do so, such root causes.

12. Reporting to CySEC

The Company, in accordance with the relevant laws and regulations shall adhere to the complaint reporting requirements and provide information on complaints and complaints handling to CySEC. Every month, the Company provides to CySEC information on whether it has received complaints during the reporting period and how these are being handled. In particular, the Company completes every month an electronic form (excel file, hereinafter the "Form") and submits it to CySEC within five (5) days after the reporting month.

The Form is submitted in electronic form via the TRS system in accordance with CySEC's regulatory requirements. In the event where the Company has resolved and/or revised a complaint which was referred to CySEC in a previous submission of the Form, the Company must complete all the fields of the Form and select

the 'U' from the column Record Type. In case where the Company did not receive any complaint within the reporting month, it still has an obligation to submit the Form to CySEC via the TRS system by selecting "No" in the relevant field without completing any other information on the Form.

13. Policy Violation

Where an employee violates this Policy, intentionally or not, the matter shall be dealt with under the Code of Conduct. The employee will be subject to disciplinary action and the manner and severity of the disciplinary action will be determined by the Company's policies and the nature of the situation.

14. Training

Key employees shall occasionally attend training related to complaints handling to ensure they understand the requirements and restrictions imposed by the provisions of this Policy.

15. Clients Complaints Policy Update

The present Policy shall be reviewed annually and ad-hoc, including, when necessary, to reflect any updates in the applicable requirements. The Compliance and AML Officer shall be responsible for any development of the appropriate systems needed to comply with the applicable requirements, and any amendments should be approved by the Board of Directors of the Company.

16. Appendix I: Client Complaint Form

Instructions

Please complete, sign, and send a copy of your Complaint Form by email or post, if you have any complaints regarding the services provided by Hoxton Capital Management (Europe) Ltd.

Contact Details:

- Email: complaint@hoxtoncapital.eu

- Post: Mesogiou 15, First Floor, Voroklini, Larnaca, 7041, Cyprus

Please enclose together with your Client Complaint Form, any supportive evidence, and any other relevant documentation. Please note that the submission of a complaint is free of charge.

Client Information

- Name / Surname:
- Identity/Passport Number:
- Country of Issue:
- Legal Entity Name:
- Address/ Post Code/ City/ Country:
- Home Tel / Work Tel / Mobile :
- Email:

Brief Summary of the Complaint

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Description of the Product or Service and/or Department and/or Employee You Are Complaining About

- Description:

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- Evidence:

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- Magnitude of Damage:

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- Suggested Way to be Solved:

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*Please enclose any other relevant documentation that may assist us in handling the complaint.

Your Signature

Full Name:

Signature:

Date:

For Internal Use Only

- Complaint received by:
- Date of reception:
- Reference number:
- Department involved:
- Initial response to client date:

- Initial Action Taken:

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- Informed Client of Initial Action Taken date:

- Further Action Taken: - Yes - No

- Date:

- Further Action Taken:

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- File handed on to Managing Director: - Yes - No

- Date:

- Settlement of Complaint: - Yes - No

- Date:

- Summary of how the complaint was settled:

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- Signature of responsible Officer:

- Date: