



Holborn Assets

COMPLAINTS HANDLING PROCEDURE

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Holborn Assets Wealth Management (Cy) Ltd ("Holborn Assets", "our", "we") is an authorized Cyprus Investment Firm (CIF) which is regulated by the Cyprus Securities and Exchange Commission ("CySEC"), under License number 394/20 .

As part of our commitment to provide the best possible quality of service to our clients we uphold effective and transparent procedures for the reasonable and prompt complaint handling for existing and potential clients. We maintain Records of Complaints and measures taken for prompt and efficient complaint resolution, in line with applicable Laws, Rules and/or Regulations and we are pleased to operate in accordance with the Complaint Management Procedures of CySEC.

We will deal with the client complaint in a prompt and efficient manner by following the procedure outlined below to ensure that the complaint is resolved within the specified period.

Any complaint must be dealt with within Cyprus, in accordance with the Complaint Handling Procedures set forth herein and the client agrees that we shall have the right to resolve any complaint between us in accordance with the Complaint Handling Procedures set forth herein. If the complaint or dispute cannot be resolved internally in accordance with our Complaint Handling Procedures set out herein, the client may refer the matter to the Financial Ombudsman of the Republic of Cyprus.

Complaints Procedure

The client must always submit the complaints in writing, as clearly and as detailed as possible. All complaints will be handled promptly, treated fairly and with strict confidentiality.

A formal complaint form should be submitted to Holborn Assets Compliance Officer at any time in writing by completing and sending the report which can be found in page 3 below, named as "Complaint Form". The Client may register a complaint using any of the following options:

- Email: complaints@holbornassets.com.cy
- Telephone: +357 25 560 504
- Postal Address: 210 Amathountos Boulevard, 4534 Pyrgos, Limassol, Cyprus

The complaint or grievance will be handled by the Compliance Officer who shall immediately register the complaint in the Company's internal register and give it a unique reference number.

The Company shall send a written acknowledgment to the client within forty-eight (48) hours from the time the complaint is received, describing the procedure and who is responsible for handling it, confirming that the complaint has been received it will take all required actions to resolve the complaint, as well as the approximate time required to do so.

This Acknowledgement will confirm the necessary action required to resolve the complaint and will contain details of our Complaints Handling Procedure, and the client right to refer the Complaint the Financial Ombudsman if you are dissatisfied with the Company's decision.

When the Compliance Officer receives the Complainant's complaint then a written acknowledgement will be sent to the Complainant confirming to them:

- the Complaint Reference Number
- the name and job title of the person dealing with the complaint

The Company will then gather and investigate all relevant evidence and information regarding the complaint and provide an Initial response without any unnecessary delay within 14 (fourteen) working days from the date that the

Compliance Officer receives the Client's complaint. It is provided that, during the investigation of the complaint, the CIF informs the complainant of the handling process of his/her complaint.

When an answer cannot be provided within the expected time limits, the Company will inform the complainant about the causes of the delay and indicate when the Company's investigation is likely to be completed.

Within 4 weeks from the date that the Compliance Officer receives the Client's complaint, then a final response or a holding response will be sent to the Complainant explaining the findings of the investigation. In the case where a holding response is sent to the Complainant, then an explanation shall be given stating the reasons why the Company has not been able to resolve the complaint as well as giving an estimated time to resolve the issue;

If after 8 weeks of receiving the complaint we are still not in a position to resolve the issue then the Compliance Officer will notify you in writing stating the reasons for the delay and indicate an estimated time to resolve the issue;

When the complainant has received the final response he will have 8 weeks to respond. If no response has been received from the complainant indicating that he is still dissatisfied with the explanation then the Complaint will be considered as resolved;

The client may refer the complaint to Financial Ombudsman of the Republic of Cyprus within six (6) months of the date of the final response. The complaints handling is available at the Financial Ombudsman's website:

http://www.financialombudsman.gov.cy/fore/fore.nsf/index_en/index_en?OpenDocument

All decisions relating to Clients' complaints or grievances shall be communicated to Clients in writing (including electronic mail) and copies shall be retained by the Relevant Department. The decisions with respect to complaints or grievances in relation to the Relevant Department shall also be retained by the Compliance Officer.

The Company is required to provide to the CySEC information regarding the complaints it receives via an electronic form to the Commission on a monthly basis.

Maintenance of Complaints Register

The Compliance Officer maintains a central record of all complaints that includes all the information and documents relating to the submitted complaints are included, as well as the final outcome of these.

- For the purposes of compliance with paragraph 13(5) of the Directive DI144-2007-01 the Company must register the complaints it receives as soon as possible, in an internal register with an appropriate manner, as well as for easy reference and retrieval. Also the Company must apply the following:
- Upon receiving the complaint, the Company will register the complaint directly to an internal register, giving it a unique reference number.
- The unique reference number is communicated to the complainant.
- The Company stores all complaints it receives on an internal archive, as quickly as possible, and in an appropriate manner.
- The Company is required to provide to the CySEC information regarding the complaints it receives via an electronic form to the Commission on a monthly basis.
- The complainant should use the said reference number in all future contact with the Company, the Financial Ombudsman and/or the CySEC regarding the specific complaint.

The Company shall maintain all complaints or grievances for a minimum period of **five (5) years**. Responsible Department shall be the Compliance Department.

COMPLAINT FORM

Please complete this form if you have any complaints with regard to the services provided by Holborn Assets Wealth Management (Cy) Ltd.

Client Information

Title:

Name:

Surname:

Identity/Passport Number:

Country of Issue:

Legal Entity Name:

Address:

Post Code:

City:

Country:

Home Tel:

Work Tel:

Mobile:

Fax:

Email:

Brief Summary of the complaint:

Description of the product or service and/or department and/or employee you are complaining about (description, evidence, magnitude of damage and suggested way to be solved):

Please enclose any other relevant documentation that may assist us to handle the complaint.

Signature:

Date:

For internal use only:

Complaint received by:

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Date of reception:

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Reference number:

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Department involved:.....

Initial response to client: Yes No Date:

Initial Action Taken:

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Informed Client of Initial Action Taken: Yes No 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:



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