



# Complaints Handling Procedure

## I. General

**EXT LTD** (further in the text as **EXT**), being licensed and regulated financial institution, must put in place effective arrangements for the reasonable and prompt investigation and resolution of complaints arising in connection with the performance of, or its failure to perform, any of its regulatory functions (any such matter, a “Complaint”).

These arrangements must include procedures for a Complaint to be fairly and impartially investigated by a person of sufficient competence who, where appropriate, was not directly involved in the matter which is the subject of the complaint and for the person making the Complaint (“Complainant”).

EXT has adopted the following Complaints Handling Procedures.

A Complaint which runs its full course will consist of the following key stages:

- (i) All Complaints must be submitted in writing;
- (ii) At first instance, EXT will investigate the Complaint and attempt to resolve it. If the Complainant is dissatisfied with EXT’s response or proposals to redress the Complaint, the Complainant may refer the office of Financial Ombudsman;
- (iii) Financial Ombudsman’s office will investigate the case in accordance with its rules;
- (iv) There is no restriction on who can bring a Complaint, although a Complaint must be an Eligible Complaint in order to be capable of being handled in accordance with these Procedures.

## 2. Eligible Complaints

Eligible Complaints are Complaints against EXT arising in connection with the performance of, or its failure to perform, any of its regulatory functions.

A Complaint will not be an Eligible Complaint if it:



- (i) Relates to EXT's relationship with its employees;
- (ii) Relates to the content of EXT's Rules;
- (iii) Is connected with a contractual or commercial dispute involving EXT and is not connected in any way with EXT's regulatory functions;
- (iv) Is made outside the period of 12 months from the date on which the Complainant becomes aware of the circumstances giving rise to the Complaint unless the Complainant can show reasonable grounds for delay;
- (v) Is of a frivolous or vexatious nature or amounts to an abuse of process.

### 3. Making a Complaint

A Complaint should be made in writing and sent by e-mail to [complaints@ext.com.cy](mailto:complaints@ext.com.cy) and/or by registered mail to:

EXT LTD  
28 October Avenue,  
365 Vashiotis Seafront Building,  
3107, Limassol, Cyprus

The Complaint should be signed on behalf of the Complainant, and in any case where it is made by a company, partnership or other body corporate, should be signed by a director or equivalent officer with appropriate authority.

If a Complaint is made orally, the Complainant will be asked to confirm its Complaint in writing. EXT shall not be obliged to investigate any Complaint unless and until the Complainant has submitted a written Complaint in accordance with these Procedures.

The written Complaint should include sufficient information to allow EXT to properly identify the matters to which the Complaint relates, the activities complained of, and the basis for any alleged loss or other detriment of the Complainant.

### 4. Investigation of Complaints

At the first instance, an investigation into the Complaint will be conducted by a suitably senior member of staff or external Compliance officer who has not previously been involved in the matter and who is not the subject of the Complaint.



EXT will acknowledge the Complaint within five Business Days of receipt, giving the unique reference number of registered complaint, name and job title of the individual handling the Complaint and including a copy of these Complaints Handling Procedures.

EXT will seek to resolve any Eligible Complaint as quickly as possible. In normal circumstances, EXT should be in a position to respond within two months after receipt of the Complaint. However, where the scope of the Complaint reasonably demands further investigation, within 2 months EXT will write to the Complainant explaining why the matter has not been resolved, indicating when a final response is likely to be made with maximum extend up to 3 months from the day of complaint.

The Complainant has the right to refer the Complaint to the office of Financial Ombudsman or CySEC at any time.

Where, in the opinion of EXT, any Eligible Complaint is connected with or arises out of the same or similar facts or circumstances in respect of which an outstanding or otherwise unresolved Complaint has been made under these Procedures, EXT may, in its absolute discretion and upon giving notice in writing to any Complainant or Complainants so concerned, join such Eligible Complaints so that they may be addressed in the same investigation and/or any final response.

EXT shall not in such circumstances be obliged to disclose the identity of a Complainant or facts that in its opinion would be likely to reveal such identity when notifying any individual Complainant of such a joinder or in its drafting of a final response.

EXT may obtain professional advice as appropriate.

In case where the complainants are not individuals EXT offers alternative means of settling a dispute, such as arbitration or tribunal where appropriate; the options are stated in the Terms of Business.

## 5. Result of the Investigation

EXT will inform the Complainant of the outcome of the investigation, together with any proposed remedial action. The remedial action taken may include, but will not be limited to, offering an apology, taking steps to rectify the error, the offer of a compensatory payment on an ex gratia basis, or a combination of the above. If a Complaint is rejected, EXT will give its reason for doing so.

EXT may, where it deems it necessary, itself refer the office of Financial Ombudsman or CySEC for investigation.



## 6. Referral to the Office of Financial Ombudsman or CySEC

Finally, the Company will inform the complainant that he/she may refer the complaint, if not satisfied with the Company's final response, to **the Cyprus Securities and Exchange Commission** for further investigation:

- electronically: <https://www.cysec.gov.cy/en-GB/complaints/how-to-complain/>

or to **the Financial Ombudsman of Cyprus** in one of three (3) ways:

- By hand or post to the address: 13 Lord Byron Avenue, 1096 Nicosia
- By Facsimile (Fax): +357 22660584, +357 22660118
- By email: [complaints@financialombudsman.gov.cy](mailto:complaints@financialombudsman.gov.cy)

Website: <http://www.financialombudsman.gov.cy/>

In the event that the Complainant is not satisfied by the decision of the Financial Ombudsman, the Complainant may take the case to court as an option of last resort.

### Important Notes:

The Company shall cooperate with the Cyprus Securities and Exchange Commission and/or the Financial Ombudsman in case they carry out their own investigation in relation to a client's complaint.

The Commission has no restitution powers, therefore any complaints submitted are taken into consideration in the performance of its supervisory role.

## 7. Record-Keeping

A copy of all documents and materials relating to Complaints should be sent to EXT.

EXT will retain such documents and materials for a minimum of five years.

All Complaints that have been received must be registered on EXT's Complaints Register maintained in a hard copy and as Google document.

## 8. Confidentiality

EXT and any Complainant must each observe the strict confidentiality of the investigation of any Complaint, all information provided and all communications made for the purpose of the investigation.