

# Complaints Management Policy

Reviewed by: CO  
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## 1. About the Policy

- 1.1. The purpose of the Complaints Management Policy (“Policy”) is to set the procedure to be followed and the appropriate actions required by the Company, when receiving any complaint or grievance from any client or potential client, whether they are a retail client, professional client or eligible counterparty, ensuring the reasonable and prompt handling of complaints or grievances.
- 1.2. The Policy is defined and endorsed by the Senior management and the Board of Directors of the Company, who are responsible for its implementation and monitoring the Company’s compliance with it.
- 1.3. The Company regularly reviews and publishes complaints-handling process on the Company’s official website, [www.wisdompointcapital.com](http://www.wisdompointcapital.com).
- 1.4. Complainants can lodge complaints and receive responses free of charge.
- 1.5. The Policy does not apply to complaints or grievances expressed by a method not described in the Policy.

## 2. Definitions

In the Policy, except where the context otherwise requires:

“Commission” means the Cyprus Securities and Exchange Commission.

“Company,” means WISDOMPOINT CAPITAL LTD.

“Complainant” means any natural or legal person, who is eligible to lodge a Complaint with the Company and who has already lodged a Complaint.

“Complaint” means a statement of dissatisfaction addressed to the Company by a Complainant relating to the provision of investment services.

“Policy” means this Complaints management policy.

### 3. Lodging a Complaint

- 3.1. If a Complainant has any objection concerning the provision of investment and ancillary services and/or the performance of investment activities, they are encouraged to submit a complaint at [customers@wisdompointcapital.com](mailto:customers@wisdompointcapital.com) with the subject line «Client complaint». A Complainant should use the Client Complaint form in Annex A of the Policy.
- 3.2. In case a staff member needs to complain or report an incident, this will be communicated to the Compliance Officer, who, according to the nature of the grievance, will decide on further steps, the persons within the Company that need to be notified, and any measures to be taken.
- 3.3. The complaint will initially be received by Customer Support and registered in the Company’s internal register, assigning it a unique reference number as soon as possible. The unique reference number must consist of ten digits:
  - the first two digits are “FU”,
  - the following four digits define the year, and
  - the last four digits denote the serial number of each complaint (e.g. for 2018 - FU20180001, FU20180002, for 2019 - FU20190001, FU20190002).

Customer Support Officer confirms the receipt of the Complaint within five (5) working days to the Complainant and informs them of the unique reference number. The Complainant should use this reference number in all future contact with the Company, the Financial Ombudsman and/or the Commission regarding the specific Complaint. Additionally, Customer Support Officer will inform the Complainant about the process that will be followed when handling the Complaint (e.g. when the Complaint will be acknowledged, indicative handling time, the availability to contact the Commission, the Financial Ombudsman, an ADR mechanism, or the relevant Courts).

- 3.4. In the absence of Customer Support Officer (e.g. due to illness, annual leave, training, etc.), the Executive Director of the Company will be responsible for handling complaints. All principles regarding the Conflict of Interest Policy and Chinese Walls will be implemented in such cases.

### 4. Investigation

- 4.1. On the day of the registration of a Complaint in the internal register, the Head of the Reception and Transmission and Execution of Orders Department and the Compliance Officer shall receive notification from Customer Support Officer.

- 4.2. The documentation or other material that may assist in the resolution of the Complaint should be requested from the Complainant or the relevant department and added to the Complaint's file.
- 4.3. The Customer Support Officer to whom the Complaint has been directed shall establish contact with the Complainant and attempt to achieve an adequate solution, considering the interests of both the Complainant and the Company. If this attempt does not succeed, the Customer Support Officer shall inform their direct superior, who shall also attempt to formulate an appropriate solution. If this also fails, the Senior Management of the Company shall be extensively informed, and they will then contact the client to finally formulate a solution, considering the interests of both parties.
- 4.4. Within two months of the investigation of the Complaint, the Company must inform the Complainant in writing about the outcome of the investigation. If the Company is unable to respond within two months, it must inform the Complainant of the reasons for the delay and indicate the expected period within which the investigation will be completed. This period cannot exceed three months from the submission of the Complaint.
- 4.5. The Company will analyse, on an ongoing basis, complaints-handling data to ensure that we identify and address any recurring or systemic problems and potential legal and operational risks. This will be done by:
  - a) Analysing the causes of individual complaints to identify root causes common to types of complaints,
  - b) Considering whether such root causes also affect other processes or financial means, including those not directly complained of; and
  - c) Correcting, where reasonable to do so, such root causes.

## **5. Responses and final decisions**

- 5.1. Once the issue has been resolved, the responsible person (Customer Support Officer) will document the resolution and assign a closed status to the Complaint, indicating that it has been dealt with, including explanations and description of the actions taken.
- 5.2. The Complainant should be informed of the final decision within the timeframe indicated in point 4.4 of the Policy.
- 5.3. The Complaints processing should be fully documented and added to each client/employee file it relates to.
- 5.4. The following details must be documented and kept in records by the Customer Support Officer in regards to complaints:

- The details of the ID of the client who filed the Complaint/grievance.
- The service to which the Complaint/grievance refers.
- Details of the employee who undertook to provide the service to the client.
- The department or organisational unit to which the employee relates.
- The date of receipt of the Complaint/grievance.
- The content of the Complaint/grievance in summary.
- The extent in financial terms of the potential loss that the client claims he has suffered or as derived from the content of the Complaint.
- The date and summary of the Company's reply to the Complaint.

5.5. Records of all lodged and resolved complaints/grievances should be maintained for a minimum period of five (5) years.

## 6. Appeal

6.1. When providing a final decision that does not fully satisfy the Complainant's demands, the Company notifies the Complainant in writing, providing a thorough explanation of its position on the Complaint and outlining the Complainant's options to maintain the Complaint, such as through the Commission, the Financial Ombudsman, ADR Mechanism, or the relevant Courts.

6.2. A Complainant may use the following authorities to file an appeal against a final decision or in cases of a delay in a final decision:

### i. The Commission:

Cyprus Securities and Exchange Commission  
Office address: 27 Diagorou Str. CY-1097 Nicosia, Cyprus  
Postal address: P.O BOX 24996,1306, Nicosia, Cyprus  
Telephone: +357 22506600, Fax: +357 22506700  
Website: [www.cysec.gov.cy](http://www.cysec.gov.cy)

### ii. The Financial Ombudsman:

Postal address: 13 Lord Byron Avenue, 1096, Nicosia, Cyprus  
Telephone: +357 22848900, Fax: +357 22660584, +357 22660118  
Website: [www.financialombudsman.gov.cy](http://www.financialombudsman.gov.cy)  
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)

**iii. The Alternative Dispute Resolution mechanism (if applicable)**

**iv. The relevant judicial authority (court)**

**7. Responsibility and Submission of information to the Commission**

- 7.1. Every month, within five days after the reporting month, the Company provides the Commission with information in electronic form regarding the complaints it receives and how they are being handled, in accordance with Circulars C100, C198, as amended.
- 7.2. Customer Support Officer is responsible for completing of information regarding the complaints to the Commission.

CLIENT COMPLAINT FORM

Date:

Full name:	
ID/Passport No/Registration No:	
Account No:	
Contact detail including e-mail:	
Complainant cause:	
Complainant cause comments (if "other" selected in previous column):	
Financial instrument:	
Financial instrument comments (if "other" selected in previous column):	
The date of the last correspondence with the Company employee and the name of that employee:	
A detailed summary of the events leading up to a complaint:	
Expected resolutions/outcomes to rectify the situation:	

Signature:

If the Clients wish to lodge a complaint against WISDOMPOINT CAPITAL LTD he/she could fill in this form, print, sign and send out it to [customers@wisdompointcapital.com](mailto:customers@wisdompointcapital.com).