



1. Purpose

The Complaints Policy, as included in the Internal Procedures Manual, gathers all measures taken by the Company in order to solve potential inconveniences that might occur along the business relation.

Resolution of client complaints is achieved without undue delay, taking into consideration the seriousness of the complaint as well as the financial implications this may have to both the clients as well as the Company in accordance with the Company's Complaints Policy, as amended from time to time.

A CIF is required to provide to the Commission, in electronic form, information regarding the complaints it receives and how these are being handled.

2. Operational procedure

2.1 The operational procedure for the handling of formal complaints received by Spot Capital Markets Ltd is outlined in the respective Complaints Handling Procedure which includes both client reporting and internal handling procedures.

The procedure is based on Circular no. CI144-2012-05 issued by the CySEC and is included in the Internal Procedures Manual.

2.2 According to the Complaints Handling Procedure the following information should be collected and recorded:

- (i) Date of receipt and registration of the complaint;
- (ii) Details of the client that made the complaint;
- (iii) Service/department to which the complaint relates to;
- (iv) Details of the Company's employee responsible for the service(s) rendered to the client;
- (v) Content of the complaint;
- (vi) Magnitude of the damage which the client claims to have suffered or which can be presumed to have suffered on the basis of the content of the complaint;
- (vii) Date of the Company's answer;
- (viii) The content of the Company's written response to the complaint lodged;
- (ix) Reference to any correspondence exchanged between the Company and the client, which should be included in the Company's file.

2.3 As soon as a complaint is received through infoscsm@spotcapitalmarkets.com, the Complaints Policy and the Complaints Handling Procedure shall be followed.

Upon receipt of such complaint by the Company, a written confirmation of receipt will be sent by the Back Office or the Compliance Officer to the client together with a note indicating that the complaint will be investigated and the results will be communicated to the client within estimated timeframe.



- 2.4 The Company shall notify the client via e-mail on the reasons that caused the problem within three (3) working days following receipt of the complaint.

The Company shall communicate via e-mail a final solution to the client within five (5) working days following receipt of the complaint.

3. Complaint submission

Clients can submit a complaint to the Company by using the Complaint Reporting Form:

- (i) The client is kindly requested to duly complete the Complaint Reporting Form providing all requested information, sign and stamp (as applicable).
- (ii) The Complaint Reporting Form can be sent to Spot Capital Markets via email at infoscm@spotcapitalmarkets.com or via fax at: + 357 25 377 117 or via registered post at 319, 28th October Street, Kanika Business Center, 2nd floor, CY-3105, Limassol (Att: Head of Compliance).

4. Complaint receipt

Following receipt of the complaint by the Company, the client will receive an acknowledgement e-mail indicating the estimated timeframe for investigation and resolution of the problem.

In the case where a client complaint or grievance is valid, the management shall take such necessary action together with the Head of Department(s) to which the complaint or grievance is related in order to identify and verify:

- (i) Reasons for failure of procedure followed;
- (ii) Weaknesses of the internal controls;
- (iii) Implementation of internal controls that would prevent any complaint or grievance in the future.

Following the completion of the investigation the results will be included in the Complaints Handling Form.

5. Complaints Policy review

The Company may update this Complaint Policy from time to time. In the event that the Company materially changes this Policy including how it collects, processes or uses clients' personal information, the revised Complaint Policy will be uploaded in the Company's website. In this respect, the clients hereby agree to accept posting of a revised Complaint Policy electronically on the website as the actual notice of the Company to its clients. Any dispute over the Company's Complaint Policy is subject to this notice and the Client Agreement. The Company encourages its clients to periodically review this Complaint Policy so that they are always aware of what information the Company collects, how it uses it and to whom it may disclose it, in accordance with the provisions of this Policy.