

Complaints Handling Policy

Pursuant to the implementation of the Markets in Financial Instruments Directive (MiFID) and in accordance with the provision of the Directive for the Authorisation and Operating Conditions of Cyprus Investment Firms (DI144-2007-01), Emergo Wealth has established, implemented and maintains effective and transparent procedures for the professional, objective and prompt handling of complaints received from *Retail Clients* or potential *Retail Clients*, and to keep a record of each complaint and the measures taken for the complaint's resolution. Such procedures and records are the responsibility of the Administration/Back Office Department.

The Internal Auditor shall supervise the implementation of the Company policy and procedures with respect to Client Complaints.

Procedures

The following details have to be documented

- the identity of the Client who filed the complaint
- the identity of the employee that undertook to provide the service to the [SEP] Client
- the department to which the relevant employee relates to
- the date of receipt of the complaint
- the details of the complaint – full description
- the extent in financial terms of the potential loss that the Client claims [SEP] has suffered
- the date and in summary, the content of the reply of the Company to [SEP] the said complaint [SEP]

Resolving Clients Complaints

The Head of the Administration/Back Office Department shall be responsible for documenting all complaints received by the Company. Complaints can be received:

- By post to: 12 Demostheni Severi Street, 1090 Nicosia, Cyprus (Attention to: Complaints Handling Officer)
- By email to: complaints@emergowealth.net
- By telephone [SEP] at: +357 22449122
- By fax at: +357 22780589

All complaints must be acknowledged in writing within 5 working days of being received. The written acknowledgement sent to the Complainant will include the details as to the name and capacity of the person dealing with the complaint. Depending on the significance of the complaint this acknowledgement may also include a proposed resolution.

Following the receipt of a complaint, by the Company, the Head of the Administration/Back Office Department shall make efforts to resolve the complaint within 5 working days. Following resolving the issue, the Head of the Administration/Back Office Department shall record the remedy measures or explanations granted, as applicable. [SEP]

In the event that the issue has not been resolved within 5 working days, or if the remedy measure involves actions by other departments, then the Head of the Administration/Back Office Department shall communicate the Client's complaint to the Chief Operating Officer. A letter of acknowledgment should be sent to the Complainant, stating that the complaint is still under investigation and upon completion the Complainant will be informed of the outcome.

The Chief Operating Officer shall review carefully the details of the Client's complaint brought to him. Once the Chief Operating Officer understands fully the nature of the Client complaint, he may also communicate with the Client, to understand fully the nature and implications of the complaint, as applicable. At the same time, the Chief Operating Officer shall investigate and co-ordinate any relevant Heads of the Departments related to the Client complaint, until it is satisfactorily resolved.

In case the investigation is not concluded within four weeks following the submission of the complaint, the complainant will be informed in writing on the investigation's progress, the reason why the Company has been unable to resolve the complaint in the aforementioned time frame and an indication on when further contact will be made.

The Chief Operating Officer shall inform the Board, as well as the legal advisor of the Company of all Client complaints brought to him, at least annually.

In cases where Client complaints are in relation to the Administration/Back Office Department, the Compliance Officer of the Company shall have the responsibility and shall undertake the necessary efforts for resolving the complaint following the same procedures described above.

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

The report sent to the Complainant will explain clearly:

- The outcome of the investigation
- The nature and terms of any offer of settlement which the Company is prepared to make in satisfaction of the Complaint or

- The reasons for declining to offer a settlement

The report will also state that if the Complainant does not indicate dissatisfaction within one month of receiving the report, the Company will treat the complaint as settled.

The Company will also inform the Complainant that they may refer the complaint with a copy of the final response to the Cyprus Securities and Exchange Commission (CySEC) for further investigation. The Company will cooperate with CySEC in case it decides to carry out its own investigation in relation to a client's complaint.

Record-Keeping

The Company shall maintain all complaints for a minimum period of **five** years. Responsible Department shall be the Administration/Back Office Department. Records are kept in physical and electronic form.

Further to the above, for Client complaints related to the Administration/Back Office Department, the Compliance Officer will also keep a copy of the relevant Client complaints, as applicable.