

# **Complaint Handling Policy**

**Solaris EMEA Ltd.**

**June2023**

## **COMPLAINT HANDLING POLICY**

### **1. Complaint or grievance handling**

The purpose of this Policy is to set out the procedure to be followed and the appropriate action required to be taken by Solaris EMEA Ltd (the “Company”) in the case of a complaint by any client to ensure the Company’s compliance with the Law and Operating Conditions of the Cyprus Investment Firms.

#### **Definitions**

“**Complainant**” means any person, natural or legal, which is eligible for lodging a complaint to 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.

“**FOS**” means Financial Ombudsman Service.

“**the CySEC**” means Cyprus Securities and Exchange Commission.

The Company, in its capacity as a Cypriot Investment Firm, and in accordance with the provisions of the Law, has established, implemented and maintains effective and transparent procedures for the reasonable and prompt handling of complaints or grievances received from clients or potential clients, and to keep a record of each complaint or grievance and the measures taken for the complaint’s resolution.

In addition, the Company:

- Applies a complaint handling policy, which is defined and endorsed by the senior management and the board of directors, who is responsible for its implementation and for monitoring the Company’s compliance with it.
- Ensures that it has a complaints management function, which enables complaints to be investigated fairly and possible conflicts of interest to be identified and mitigated.

#### **1.1 Policy**

Clients’ complaints or grievances can be received by any member of staff, however are usually handled by the Account Opening Department. The final settlement of non-trivial complaints or grievances needs to be approved by the Senior Management and Compliance of the Company.

## **1.2 Definition of a Complaint**

1.2.1 A complaint is an expression of dissatisfaction addressed to the Company by the Client (a natural or a legal person), relating to the provision of investment and/or ancillary services in accordance with the relevant Client agreement and in adherence to the relevant laws and regulations.

1.2.2 A Complaint received by the Client shall include:

- a) the Client's name and surname;
- b) the Client's trading account number;
- c) the affected transaction numbers (if applicable);
- d) the date the issue arose and a description of the issue.

1.2.3 A Complaint must not include offensive language directed either to the Company or a Company employee.

## **PROCEDURE:**

### **1.2 Submitting a Complaint**

A complainant shall complete the Complaint Form developed by the Company (available on **Appendix 1** of this Policy). The complaint must provide details to the Company in writing, specifying the nature of the complaint, providing us with specific details of the desired outcome or action of the Company that would satisfy the complainant.

Once the form is completed and signed, it should be sent either in a hard or soft copy to the Company's head offices which are situated at SOHO Office, 187 Anexartisias, Level 2, Limassol 3040, Cyprus or by e-mail to [service.eu@axi.com](mailto:service.eu@axi.com). The Company may request from the complainant to provide relevant material to support the complaint.

If the complainant's first language is not English and requires the complaint form to be provided in their native language, please contact us via email at [service.eu@axi.com](mailto:service.eu@axi.com).

### **1.3 Complaint Handling**

The Company confirms, within five days, the receiving of the complaint to the complainant and provides the complainant with a unique reference number which will be used for all future communication with the Company and/or the CySEC and/or the Financial Ombudsman regarding the complaint. The Company investigates the complaint and replies, within two months, to the complainant whether the complaint has been successfully resolved or whether further time will be needed for an outcome. During the investigation of the complaint, the Company informs the complainant of the handling process of his/her complaint.

In the event that the Company is unable to respond within two months, the Company informs the complainant of the reasons for the delay and indicates the period of time within which it is possible to complete the investigation. This period of time cannot exceed three months from the period of submission of the complaint.

If after a period of three months, the Company has not completed its investigation and provided a final response, the Company must either:

- A) Provide a final response in writing which:
  - a. accept the complaint, and where appropriate, offer redress or remedial action; or
  - b. offer redress or remedial action without accepting the complaint; or
  - c. reject the complaint and give our reasons for doing so, and, which
  - d. Provides the website address of the Financial Ombudsman Service;
- ii. Informs the complainant that he or she may refer the complaint to the FOS if dissatisfied and, if so, do so within four (4) months of the date of our final response; and
- iii. Indicates whether or not we consent to waive the relevant time limits.
- B) Provide a written response:
  - a. Explaining why we are not in a position to make a final response and provide an indication as to when we expect to be able to do so;
  - b. Inform the complainant that he or she may now refer the complaint to FOS;
  - c. Indicate whether or not we consent to waive the relevant time limits;
  - d. Provide the website address of the FOS.

If the provided investigation results do not fully satisfy the complainant's demands, the Company should provide to the complainant in writing a thorough explanation of its position on the complaint and set out the complainant's option to maintain the complaint e.g. through CySEC, the Financial Ombudsman, or the relevant Courts. The Financial Ombudsman Service is an independent service in Cyprus for settling disputes between businesses providing financial services and their customers. The complainant may contact the FOS within four months of receiving a final response from the Company, otherwise the Financial Ombudsman may not be able to deal with the complaint.

Contact Details of the Financial Ombudsman:

**Address:** Kipranoros 15, 1061 Nicosia, Cyprus

**Phone:** +357 22848900

**Complaints:** [complaints@financialombudsman.gov.cy](mailto:complaints@financialombudsman.gov.cy)

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

The Company advises that the FOS will not consider a complaint until the Company has had the opportunity to address the complaint, and any reference to FOS should not be made by the complainant until he/she receives a final response from the Company or four months after the date of the complaint, whichever is sooner.

The Company maintains all complaints or grievances for a minimum period of five years.

**1.3 Principles of the Complaint Handling Procedure:**

1.3.1 All complaints shall be treated confidentially;

1.3.2 The Company shall handle Client's complaints in a fair and timely manner;

1.3.3 The Company shall take all reasonable steps to investigate the complaint and respond promptly to the Client;

1.3.4 The Company shall use its best endeavours to provide the best services to the client.

**2. Updates of the Complaint Handling Policy**

The Company assess and periodically reviews, on at least annual basis, the Policy and takes all appropriate measures to address any deficiencies. In the event that the Company materially changes this Policy, the revised Policy is uploaded in the Company's website. In this respect, the Clients are requested to hereby accept the revised Policy electronically. Any dispute over the Company's Policy is subject to this notice and the Client Agreement. The Company encourages its Clients to periodically review the Policy and a report is provided to the senior management.

Any updates and/or changes in the Policy of the Company is approved by the Board of Directors of the Company. Policy is required to be reviewed annually a report is provided to the senior management.

### **3. Frequently Asked Questions**

3.1 Should the Client have any questions or inquiries regarding the Complaint Handling Procedure, the Client shall contact the Client Services Team at [service.eu@axi.com](mailto:service.eu@axi.com).

4. **Appendices**

Appendix 1 – Complaint Form

**COMPLAINT FORM**

Unique Identification Number: \_\_\_\_\_  
(this will be provided to you by the Company)

Client's Name: \_\_\_\_\_

Account ID: \_\_\_\_\_

Address: \_\_\_\_\_

Email: \_\_\_\_\_

Description: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Please enclose any evidence and relevant documentation. Submit the form via email to [service.eu@axi.com](mailto:service.eu@axi.com) .

---

**Internal Use Only**

Employee handling the complaint: \_\_\_\_\_

Position: \_\_\_\_\_

Date of Receipt: \_\_\_\_\_ Date of response: \_\_\_\_\_

Result and Date of final resolution:

\_\_\_\_\_