

FREEDOM FINANCE EUROPE LTD

COMPLAINTS MANAGEMENT POLICY

5th of December 2023

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1. Introduction

1.1. Freedom Finance Europe Limited (hereinafter called the “Company”) is a Cypriot Investment Firm (“CIF”) registered with the Registrar of Companies under number HE 324220 and regulated by the Cyprus Securities & Exchange Commission (“CySEC”) under license number 275/15 and is under obligation to cooperate with MOKAS.

1.2. Following the requirements and/or obligations implemented by the following laws and regulations and in compliance with the current legal framework:

- the Law 87(I)/2017 for the provision of investment services, the exercise of investment activities, the operation of regulated markets and other related matters, incorporating Directive 2014/65/EU (MiFID II) into national law;
- EU Regulation 565/2017 regarding the organizational requirements and operating conditions for investment firms;
- Joint Committee Final Report on guidelines for complaints-handling for the securities (ESMA) and banking (EBA) sectors (JC 2014 43) repealed as of 01-05-2019;
- Guidelines on complaints-handling for the securities (ESMA) and banking (EBA) sectors (JC 2018 35) as of 4 October 2018;
- CySEC Circular C338 about Guidelines on complaints-handling for the securities sector – Handling of client’s complaints by CIFs

the Company has developed and implemented adequate Complaints management Policy to establish, implement and maintain effective and transparent complaints management procedures for the prompt handling of clients' or potential clients' complaints.

2. Definitions

2.1. **Client / Customer** refers to any person from whom, or on whose behalf, the Company

receives, acquires or holds funds or securities for the account of such person.

- 2.2. **Complainant** means any person, natural or legal, which is eligible for lodging a Complaint to the Company and who has already lodged a Complaint.
- 2.3. **Complaint** under this Policy means a statement of dissatisfaction relating to the provision of investment services received from a Client by post and/or by email in the format of a fully completed Client's Complaints Form.

3. Scope and purpose

- 3.1. The purpose of the present Policy is to describe the complaints resolution process and procedure followed by the Company and to ensure that any complaints received by the Company from any of its clients or potential clients are dealt with and resolved in a fair and timely manner. The Company shall treat all complaints with confidentiality and shall take all reasonable steps to investigate and respond promptly to any complaints.
- 3.2. The present Policy applies to complaints received from the Company's clients or potential clients with respect to one or more of the Investment Services and Activities that the Company is authorized to provide.

4. General principles

- 4.1. As part of its commitment to provide the best possible services to its Clients, the Company upholds effective and transparent procedures for prompt complaint handling for existing and potential Clients.
- 4.2. The Company has established a complaints management function responsible for the investigation of complaints which is carried out by the compliance department.
- 4.3. When handling a complaint, the Company communicates with clients or potential

clients clearly, in plain language that is easy to understand and tries to reply to the complaint without undue delay. Some complaints can be resolved more quickly depending on the facts and the nature of the complaint. In case of a more complex complaint that needs more time to be resolved, the Company shall communicate to the client the reasons for the delay along with a new deadline.

4.4. The Company shall provide information on complaints and complaints-handling to CySEC as applicable under national law.

4.5. The Company maintains effective and transparent procedures for the reasonable and prompt handling of complaints received from clients or potential clients, and keep records of each complaint and the measures taken for the complaint's resolution. Such procedures and records are the responsibility of the Compliance department.

5. Complaints handling process

5.1. Lodging a Complaint

5.1.1. If a Complainant has any objection concerning the provision of investment and ancillary services and/or the performance of investment activities, it is encouraged to submit a complaint at info@freedomfinance.eu with the subject of e-mail «Client complaint». A Complainant should use the Client complainant form in Annex A of the present Policy.

5.1.2. 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 grievant will decide on further steps and the persons within the organization that need to be notified, as well as any measures to be taken.

5.1.3. The complaint will initially be received by the Customer Support Department and will be registered in the internal register of the Company giving it a unique reference number as soon as possible. The unique reference number consists of ten (10) digits:

- the first two digits are “FU”,

- the following four digits define the year, and
- the last four digits denote the number of each complaint serial number (e.g. for 2017 - FU20170001, FU20170002, for 2018 - FU20180001, FU20180002).

5.1.4. The Customer Support Officer confirms within the five (5) working days the receiving of the Complaint and informs the Complainant about the unique reference number and that it should use the said reference number in all future communications with the Company, the Financial Ombudsman and/or the Commission regarding the specific Complaint as well as the process that will be followed when handling a Complaint (e.g. when the Complaint will be acknowledged, indicative handling time, the availability (where applicable) to contact the Commission or the Financial Ombudsman or ADR mechanism or the relevant Courts).

5.1.5. In case of absence of the relevant Customer Support Officer (e.g., in a case of illness, annual leave, training, etc.), the General Manager will be responsible to replace him. All principles in regard to Conflict-of-Interest Policy and Chinese Walls shall be implemented in such case.

5.2. Investigation of a Complaint

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

5.2.2. The documentation or any other supporting materials that may assist in the resolution of the Complaint should be requested from the Complainant or the relevant Company's department and added to the Complaint's file.

5.2.3. The Customer Support Officer to whom the Complaint has been directed shall establish contact with the Complainant and attempt to achieve an adequate solution, under consideration of the Complainant's vested interests, as well as those of the Company.

- 5.2.4. If he/she will not succeed, the Customer Support Officer shall inform his direct superior, who shall also attempt to formulate an appropriate solution. In case of failure, the Senior Management shall be extensively informed in order to contact the client and finally formulate a solution, under consideration of both parties' interests.
- 5.2.5. Within two (2) months of the investigation of the Complaint, the Company must inform the Complainant in writing about the outcome of the investigation. In the event where the Company is unable to respond within two (2) 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 (3) months from the submission of the Complaint
- 5.2.6. The Company is required to analyze, on an on-going basis, complaints-handling data, to ensure that the Company identifies and addresses any recurring or systemic problems, and potential legal and operational risks, for example by:
- a) analyzing 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.

5.3. Responses and final decisions

- 5.3.1. During the investigation of the Complaint, the Company informs the Complainant of the handling process of its Complaint every 5 (five) business days.
- 5.3.2. Once the issue has been resolved, the person responsible (Customer Support Officer) will document the resolution of the Complaint and a closed status for the Complaint will be given indicating that the Complaint has been dealt with explanations and description of actions taken.
- 5.3.3. The Complainant should be informed of the final decision within the timeframe

prescribed under the provisions of the present Policy.

5.3.4. The Complaints processing should be fully documented and added to each client/employee file it related with.

5.3.5. The following details must be documented and kept in records by the Customer Support Department in regard to complaints:

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

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

5.4. Appeal

5.4.1. When providing a final decision that does not fully satisfy the Complainant's demands, the Company notifies in writing the Complainant using a thorough explanation of its position on the Complaint and set out the Complainant's option to maintain the Complaint e.g., through the Commission, the Financial Ombudsman, ADR Mechanism, or the relevant Courts.

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

i. **The Commission:**

Cyprus Securities and Exchange Commission (CySEC)

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

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

Emails:

Complaints: complaints@financialombudsman.gov.cy

Financial Ombudsman: fin.ombudsman@financialombudsman.gov.cy

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

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

6. Responsibility and Submission of information to the Commission

6.1. Every month, within five days after the reporting month, the Company provides to the CySEC, in electronic form, information regarding the complaints it receives and how these are being handled in accordance with Circular C338, as amended.

6.2. The Compliance department is responsible for submitting to the CySEC the information regarding the complaints handling process.

7. Policy review

7.1. The present Policy shall be reviewed annually to confirm its effectiveness and include any enhancements.

ANNEX A. 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 you wish to lodge a complaint against Freedom Finance Europe Ltd, please, fill in this form, print, sign and send out it to info@freedomfinance.eu