

**ECOMMBX**  
**INVESTMENTS LTD**

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**COMPLAINTS HANDLING**  
**POLICY**

## REVISION HISTORY

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VERSION	REVISION DATE	REVISED BY	SECTION REVISED
1.0		Compliance Officer	Initial Drafting of the Policy

## DOCUMENT CONTROL

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DOCUMENT OWNER	STATUS	DATE APPROVED
ECOMMBX Investments Ltd		

SECURITY CLASSIFICATION	NEXT REVIEW DATE	VERSION	DEPARTMENT
Internal		1.0	Compliance Department

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## 1. DEFINITIONS AND ABBREVIATIONS

DEFINITION / TERM	DESCRIPTION
“Company” or “CIF”	ECOMMBX Investments Limited a Cyprus Investment Firm
“Complaint”	A statement of dissatisfaction by the Complainant addressed by the Company, relating to the provision of investment services
“CySEC”	Cyprus Securities and Exchange Commission
“FO”	Financial Ombudsman of the Republic of Cyprus
“Law”	Investment Services and Activities and Regulated Markets Law of 2017 (Law 87(I)/2017), as amended from time to time
“MiFID II”	Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on Markets in Financial Instruments, as this is amended from time to time, and which is amending Directive 2002/92/EC and Directive 2011/61/EU

## 2. INTRODUCTION

ECOMMBX Investments Limited (“**CIF**” or the “**Company**” or the “**Firm**”) whose headquarters are at 27 Pindarou Str., Ground Floor, Alpha Business Center, Block B, 1060 Nicosia, Cyprus is a company incorporated and registered in the Republic of Cyprus under Cyprus Company Law and is authorised and regulated as a Cyprus Investment Firm (“**CIF**”) by the Cyprus Securities and Exchange Commission (“**CySEC**”) under license number 228/14 to provide investment and ancillary services in accordance with the provisions of the Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU, as the same may be in force from time to time and modified or amended from time to time (the “Markets in Financial Instruments Directive (2014/65/EU)” or “**MiFID II**”) which was transposed into Cypriot Law, the Investment Services and Activities and Regulated Markets Law of 2007 (Law 87(I)/2017) as amended from time to time (hereinafter the “**Law**”).

In accordance with Article 26 of Delegated Regulation 2017/565 and CySEC’s requirements, the Company is required to establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints received from its customers or potential customers, as well as to keep a record of each complaint and the measures taken for the complaint’s resolution. The Company is dedicated to providing services to its customers in a fair and impartial manner. In case of a customer complaint, the Company will make all necessary efforts to resolve the complaint without undue delay, taking into consideration the gravity of the complaint and the range of the attendant financial implications resulting there from both for the customer and for the Company.

This Complaints Handling Policy forms part of the Company’s Terms and Conditions. Therefore, by entering into an agreement with the Company, the customer also agrees to and accepts the Complaints Handling Policy. Any terms that are not expressly defined herein shall have the meanings respectively attributed to them in the Company’s Terms and Conditions of Business, unless the context requires otherwise.

## 3. SUBMISSION OF A COMPLAINT

In order to lodge a complaint with the Company, the complainant customer has to complete, the online **Customer Complaint Form**, in order for the complaint handling process to be initiated. The responsible team to receive, handle and investigate all submitted customers’ complaints is the Company’s Compliance Department. Any other statements, enquiries, requests

and/or reports shall be sent to and handled by the Customer Service Unit (CSU), however none of them will be considered as an official “complaint”. The CSU reserves the right to evaluate each customer’s issue and if appropriate suggests to the customer to submit an official complaint to the Company by completing the Customer Complaint Form. The relevant form should be as descriptive as possible in respect to the events that led to the filing of the complaint. Customer Complaint Forms which do not contain the name and other details of the applicant will not be taken into consideration.

Upon receipt of the formal complaint, an acknowledgement receipt email will be sent to the complainant within five (5) days, providing the unique reference number of the complaint as well. This unique reference number should be used in any future communications in relation to this complaint with the Company, the CySEC and the FO.

#### **4. INVESTIGATION**

The Company will investigate the complaint and provide the customer with the outcome of the investigation within two (2) months from the date you have submitted your complaint. During the investigation process, the Company will keep the complainant customer updated as regards to the status of the complaint’s handling process. The dedicated account manager, overseeing the investigation process, may contact the complainant customer directly (by email or phone) to obtain further clarifications and or information relating to the complaint. The Company will require the customers’ full cooperation in order to expedite the investigation and possible resolution of the complaint, at the earliest possible time. In case the Company is unable to resolve the complaint within two (2) months following the submission of the case, the Compliance Department shall inform the complainant customer in writing as regards the reasons for the delay and indicate the period of time within which it would be possible to complete the investigation. All complaints should be resolved within three (3) months from the submission of the complaint.

To document the investigation process, the dedicated account manager of the investigation should prepare a “Customer Complaint Investigation Report” describing objectively and in detail:

- (i) Information and identification details of the Complainant
- (ii) The unique reference number of the complaint
- (iii) The date of receipt of the complaint
- (iv) The relevant service to which the complaint relates to
- (v) Information, including important details, on the complaint submitted contact details of the officer responsible for providing the particular service(s) to the specific customer
- (vi) any claims for compensation raised by the customer
- (vii) the investigation performed and the results/decisions taken on the outcome of the investigation, as well as the proposed course of actions (if any)

All the related informational data pertaining to the investigation will be electronically stored and attached on the said investigation report.

#### **5. OUTCOME OF THE INVESTIGATION**

The outcome of the complaint shall be communicated via email including an explanation of the Company’s position and any remedy measure(s) the Company intends to take (if any). In case the complainant customer is not satisfied with the outcome of the investigation and wishes to further escalate the complaint, can do so by submitting the case, with a copy of the Company’s final response, to the Financial Ombudsman (FO) of the Republic of Cyprus, within four (4) months from the receipt of our final response, or the CySEC.

##### **The Financial Ombudsman of the Republic of Cyprus**

**Address:** 15 Kypranoros Street, 1061, Nicosia, Cyprus  
**Postal address:** 25735, 11311 Nicosia, Cyprus  
**Phone:** +357 22848900  
**Website:** [www.financialombudsman.gov.cy](http://www.financialombudsman.gov.cy)  
**Email:** [complaints@financialombudsman.gov.cy](mailto:complaints@financialombudsman.gov.cy)

##### **Cyprus Securities and Exchange Commission (CySEC)**

**Address:** 19 Diagorou Street, 1097, Nicosia, Cyprus  
**Phone:** +357 22506600  
**Website:** [www.cysec.gov.cy/en-GB/home/](http://www.cysec.gov.cy/en-GB/home/)  
**Email:** [info@cysec.gov.cy](mailto:info@cysec.gov.cy)

The Company, when providing investment services and/or ancillary services to its customers, acts and extends every effort to handle every customer complaint, honestly, fairly, professionally, and in the highest ethical standard.

## **6. RECORD KEEPING**

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The Company shall maintain the information on its Customer Complaints Register for a minimum period of five (5) years including a detailed description of the complaint(s) and measures taken to resolve them according to its internal policies and procedures.

## **7. REVIEW AND UPDATE**

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The Company's Compliance Department together with the Company's Senior Management have the responsibility to review and update the policy when the need arises, as well as communicate the procedure through the Company's personnel.