

# Complaints Handling Procedure Guide

## 1. COMPLAINTS PROCEDURE FOR CLIENTS

We have adopted this Complaints Procedure in order to ensure a fair and quick process for handling complaints that may arise from our relationship in accordance with paragraph 13 of Directive DI 1442007-01, as amended.

The Company maintains effective and transparent procedures for the reasonable and prompt handling of complaints received from complainants, and keeps a record of each complaint and the measures taken for each complaint's resolution.

The Complaints Procedure is approved by Senior Management and Board of Directors of the Company.

## 2. SUBMITTING YOUR COMPLAINT

In order to submit a complaint to the Company, you are kindly requested to follow the below instructions:

- i. The Complaint shall be in writing and shall be addressed at [Complaints@shinetrades.com](mailto:Complaints@shinetrades.com)
- ii. The complaint shall include:
  - o the client's name and surname;
  - o the client's trading account number;
  - o the affected transaction numbers, if applicable;
  - o the date and time that the issue arose; and a description of the issue.

Up-to-date as well as accurate information is required to be provided to the Company for the proper investigation and evaluation of your complaint.

Please note that the above information is indicative and not exhaustive. The Company may request further information and/or clarifications and/or evidence as regards your complaint.

Once you successfully complete and submit your complaint, the Compliance Department of the Company shall handle and investigate your complaint.

## 3. ACKNOWLEDGING YOUR COMPLAINT

We will acknowledge receipt of your complaint within five (5) days from the receipt of your complaint and provide you the unique reference number of your complaint. The unique reference number should be used in all your future contact with the Company, the Financial Ombudsman and/or CySEC regarding the specific complaint.

## 4. HANDLING OF YOUR COMPLAINT

Once we acknowledge receipt of your complaint, we will review it carefully, investigate the circumstances surrounding your complaint and will try to resolve it without undue delay.

We shall make every effort to investigate your complaint and provide you with the outcome of our investigation within two (2) months from the date you have submitted your complaint to us. During the investigation process will keep you updated of the handling process of your complaint. One of our officers may contact you directly (including communication by email or phone) in order to obtain, where needed, further clarifications and information relating to your complaint. We will require your full cooperation in order to expedite the investigation and possible resolution of your complaint

In the event that your complaint requires further investigation and we cannot resolve it within two (2) months, we will issue a holding response in writing or another durable medium. When a holding response is sent, it will indicate the causes of the delay and when the Company's investigation is likely to be completed. In any event, we shall provide you with the outcome of our investigation no later than one (1) month from the issuing of the holding response, depending on the complexity of the case and your cooperation.

Please note that the Company shall consider your complaint as closed and cease the relevant investigation in case you fail to respond to our officers within the period of three (3) months from the date of the submission of your complaint.

All complaints shall be treated confidentially.

## 5. FINAL DECISION

When we reach an outcome, we will inform you of it together with an explanation of our position and any remedy measures we intend to take (if applicable).

If you are still not satisfied with our final decision, you may maintain your complaint through the Cyprus Securities and Exchange Commission, the Financial Ombudsman service of the Republic of Cyprus or ADR mechanism or relevant Courts.

Contact Details of the Financial Ombudsman of the Republic of Cyprus:

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

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

Postal Address: P.O. BOX: 25735, 1311 Nicosia, Cyprus

Telephone: +35722848900

Fax: +35722660584, +35722660118

If you are not satisfied with the Company's final decision you may submit your complaint to the Financial Ombudsman of the Republic of Cyprus and seek mediation for possible compensation. It is important that you contact the Financial Ombudsman of the Republic of Cyprus within four (4) months of receiving a final response from the Company otherwise the Financial Ombudsman of the Republic of Cyprus may not be able to deal with your complaint.

In the unlikely event that the Company was unable to provide you with a final response within the three (3) month time period specified above you may again contact the office of the Financial Ombudsman of the Republic of Cyprus no later than four (4) months after the date when we ought to have provided you with our final decision.

Contact Details of the Cyprus Securities and Exchange Commission:

Website: <http://www.cysec.gov.cy>

General email: [info@cysec.gov.cy](mailto:info@cysec.gov.cy)

Postal Address: P.O. BOX 24996, 1306 Nicosia, Cyprus

Telephone: +35722506600

Please note that the Cyprus Securities and Exchange Commission does not have restitution powers and therefore does not investigate individual complaints. It is understood that your right to take legal action remains unaffected by the existence or use of any complaint's procedures referred to above.