

Headquarters

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Financial Services Ltd

Introduction

The Client Complaint Handling Policy of 7Q Financial Services Ltd is in accordance with the demands of the “Investment Services and Activities and Regulated Markets Law of 2017” (the “Law”), pursuant to the European Directive MiFID II – Market in Financial Instruments Directive. MiFID II is the European Parliament’s and Council’s Directive 2014/65/EU and amending Directive 2002/92/EC and Directive 2011/61/EU (recast)”, as last amended by Directive (EU) 2016/1034 of the European Parliament and of the Council, of 23 June 2016, on markets in financial instruments.

The Board of Directors (the “Board”) of the Company is responsible for ensuring that a Client Complaint Handling Policy is in place that establishes and implement effective and transparent procedures for the reasonable and prompt handling of complaints or grievances received from Clients or prospective Clients, and to keep a record of each complaint or grievance and the measures taken for the complaint’s resolution. This Client Complaint Handling Policy is approved by the Board and is reviewed annually or more frequently if required because of changes of circumstances.

The Company applies high ethical standards when providing investment and/or ancillary services to Clients and acts honestly, fairly, professionally and in its Clients’ best interests. For this reason, 7Q Financial Services Ltd has appointed its Compliance Officer, as possessing the requisite independence by not being involved in any of the activities that created the complaint, in order to be able to handle any complaints from the Clients and also to resolve and apply mandatory measures and controls in order to avoid such recurring issues. The Compliance Officer is also responsible to communicate this company’s policy to all employees, officers, and directors of the Company through adequate internal channels of communication.

Aim of the Conflicts of Interest Policy

The purpose of this Client Complaint Handling Policy is to enable our clients to have confidence in the Company’s procedures for the reasonable and prompt handling of complaints or grievances related to the offering of investment services, and to keep a record of each complaint or grievance and the measures taken for their resolution.

Definition

A complaint shall be deemed to mean any statement of dissatisfaction of a Client or any person acting on behalf of a Client alleging a grievance involving the conduct, business or affairs of the Company or any employee, officer or director of the Company.

General Principles

The Company maintains to act in accordance with this Client Complaint Handling Policy, specifically to:

- Handle complaints from Clients or prospective Clients in a timely, effective, fair and consistent manner;
- to record complaints centrally in the complaints log; and
- to report complaints to the respective manager of the affected business/operations unit and also to the Board in cases where the Client is demanding compensation and/or the investigation has revealed serious omissions or malevolent behaviour on the part of the Company employees.

A complaint should include the following elements:

- The details of the complaint - full description, including the service to which the complaint refers to, the details of the employee that undertook to provide the service to the Client, dates, figures, amounts, etc.,
- Potential damages or damages suffered by the Client,
- Request of corrective measures.

When the Company receives a complaint, an acknowledgment letter must be sent to the Client within 5 business days. This letter must include the following elements:

- Unique Reference Number,
- Name of the person responsible for handling the Client's complaint,
- Key elements of the Company's Complaint Policy,
- Expected timeframe to adequately investigate and provide a detailed and thorough response, and where necessary a resolution; and
- Expected delay of the outcome.

This Unique Reference Number can be used in the future for any communication that the Client may have with the Company, the Financial Commissioner 'Financial Ombudsman' and/or the Cyprus Security and Exchange Commission, regarding the specific complaint.

The Compliance Officer will proceed to investigate the complaint and will prepare a report to be submitted to the Company's Board for decision. He may also contact the Client to request further information and/or clarifications.

7Q Financial Services Ltd within two (2) months from the receipt of the complaint is obliged to inform the client in writing of the outcome/decision. If this is not possible within the two (2) months period, the Company will inform the Client about the reasons for the delay stating the period within which the investigation is likely to be completed, which may not exceed the three (3) months after the submission of the complaint.

The decision of 7Q Financial Services Ltd will be notified immediately and in writing. Clients' complaints will be addressed in accordance with the Company's applicable procedure and in any case with due care and diligence.

All complaints must be logged in the Complaint Log. The Complaint Log must, at least, include the following information:

- Date of complaint;
- Complainant's name;
- Nature of the complaint and the circumstances;
- Name of the person who is the subject of the complaint;
- The product or the services which are subject of the complaint; and
- The date and conclusions of the decision rendered in connection with the complaint.

Complaints in the Complaint Log must be maintained for a period of 7 years, following the resolution date.

The Compliance Officer who has the responsibility to ensure that all complaints are handled according to the policy, must monitor the complaint log and ensure that appropriate disciplinary measures are taken if necessary and provide recommendations for change in the Company's procedures if appropriate.

Where a Complainant is not satisfied with the response/solution provided by 7Q Financial Services Ltd, the Client holds the right at any time, to refer their complaint to the Cyprus Securities and Exchange Commission, the Financial Ombudsman, the alternative dispute resolution (ADR) mechanism or the relevant courts.

The Client can submit a complaint, using the following, communications channels:

By letter:

9, Archiepiskopou Makariou III Avenue
Severis Building
3rd Floor
1065, Nicosia | Cyprus

By email:

compliance@fqfs.com

By telephone:

T: +357 22763344

By facsimile/fax

F: +357 22763355

Appendix A – Client Complaint Form

▪ Client Information:

Full Name: _____

Account Number _____ I.D. / Passport Number: _____

Domicile Address: _____

Telephone Number: _____ Fax Number: _____ Email: _____

▪ Details of the Complaint (full description, including the service to which the complaint refers to, the detail of the employee that undertook to provide the service to the Client, dated, figures, amounts, etc.)

Client Signature: _____ Date: _____

For Company Use Only:

Complaint Received By: _____ Date: _____

Acknowledgement sent to Client: YES NO

Informed Client of initial action:

YES NO

Final response provided to Client:

YES NO

Comments:

Signature of Compliance Officer: _____ Date: _____