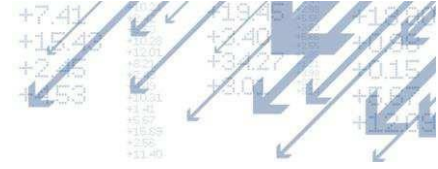


Prime Investment

Client Complaints Policy



Client Complaints Policy

1. Introduction

Prime Investment (“**Prime Investment**” or the “**Company**” or “**we**”) is authorised and regulated by the Cyprus Securities and Exchange Commission (“**CySEC**”) as a Cyprus Investment Firm (CIF) with Licence No 250/14, and thus subject to CySEC complaints handling procedures and legislation requirements.

The Company has adopted this Complaints Policy specifically designed for clients (the “**Policy**”) in order to ensure a fair and quick process for handling client Complaints (as such term is defined below) that may arise from our relationship with clients.

Our aim is to provide a high level of service to all of our clients at all times. We value feedback of all kinds from our clients and use it to enhance our products and services. We appreciate that from time to time things can go wrong or there can be misunderstandings. We are committed to dealing with queries and Complaints positively and sympathetically, as Complaints can cost money and reflect badly on the Company if not handled properly and effectively.

Accordingly, we established and implement effective and transparent procedures for the reasonable and prompt handling of client Complaints, and we maintain records of each Complaint and the measures taken for the Complaint’s resolution, in line with CySEC complaints handling procedures and legislative requirements.

“**Complaint**”- shall mean an expression of dissatisfaction by a Client or potential client regarding the provision of investment and/ or ancillary services provided to him/her by Prime Investment. Only a duly completed, submitted Complaint Form accompanied by adequate supporting evidence (as necessary) will be recorded as a Complaint by the Company and will be handled as such.

2. Submitting your Complaint

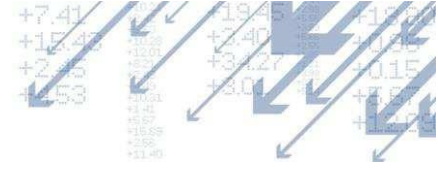
Any query and/or concern and/or issue and/or problem you may have in respect of the services provided by Prime Investment under the Client Agreement should be made in writing and addressed to the Customer Support Department via the [“Contact Us”](#) page on our Website. This page is also available through the “Help” menu on the Prime Investment Trading Platform.

Should you wish to submit an official Complaint for your account or your dealings with the Company, please complete a Complaint Form, which is accessible to clients and potential clients online on the Prime Investment platform at all times. To view or download the Complaint Form log into your Prime Investment account and click on Menu > Help > Documents > Complaint Form.

This Complaint Form can be submitted to Prime Investment in the following ways:

- Log into the [Prime Investment platform](#) and upload the form to the “[Contact Us](#)” tab under Menu > Help.
- Log into the [Prime Investment platform](#) and submit the form [via Online Chat](#).

Complaints made by clients or potential clients cannot be considered unless the Complaint Form is duly completed with all the required information and it is accompanied by adequate supporting evidence (as necessary) for the complainant’s claims.



3. Handling of your Complaint

Upon receipt of a duly completed Complaint Form, the matter will be escalated to the Complaints Team and will be recorded as an official Complaint.

The assigned Complaints officer will issue a holding response in writing, within five (5) days from the day of receipt of the Complaint, indicating that the Complaint is acknowledged, its unique reference number to be quoted in all communications with the Company regarding the Complaint, and that the Complaint is being investigated. In such event, the assigned Complaints officer will attempt to resolve the Complaint within two (2) months from the time received.

In investigating a Complaint, the Company takes into account the subject matter of the Complaint, the contents of the duly completed and signed Complaint Form, the evidence the complainant has provided, and the evidence in our records. As part of our investigation we may share and receive information (including personal, financial and trading data) regarding a Complaint with/from third parties (e.g. with the CySEC, the Financial Ombudsman of Cyprus, our legal advisors or with another subsidiary company of the Prime Investment group of companies) in line with our Privacy Policy and the User Agreement.

Further clarifications and information relating to the Complaint may be requested from the complainant within the two (2) months' time-frame, as necessary. In the event that the complainant takes more than seven (7) working days to respond to a communication, the two (2) months' time-frame will be extended by the number of days in addition to the seven (7) working days that the complainant took to respond.

Once a Complaint's investigation is completed, a Final Response shall be issued to the complainant with the investigation's outcome(s) together with any required explanations and any remedy measures the Company intends to take.

A Final Response is a written response from the Company which either:

- (a) accepts the Complaint and, if appropriate, offers redress (appropriate redress may not involve financial redress, it may, for example, simply involve an apology) in accordance to the Company's policy to resolve Complaints in amicable and good business terms;
- (b) offers redress without accepting the Complaint, as a gesture of goodwill and in accordance to the Company's policy to resolve Complaints in amicable and good business terms; or
- (c) rejects the Complaint and gives reasons for doing so.

Further clarifications on the Final Response may be provided following the complainant's subsequent communication with the Company.

A Complaint will be deemed as resolved or settled where the Company has sent in writing a Final Response and/or further clarifications on the Final Response to the complainant.

Furthermore, should a complainant fail to reply to any communication from the Company (including the Final Response) for a period of greater than one (1) month, the Company will consider the Complaint time-barred and closed.

If the Company is unable to resolve a Complaint within two (2) months, the Company will update the complainant on the status of his/her Complaint and will continue to do so until such time as the investigation is complete. According to applicable regulatory obligations,

the Company has an additional month to resolve a Complaint, if it is unable to resolve a Complaint within two (2) months (i.e. a Final Response should be issued within maximum three (3) months from the day of the Complaint).

It is understood that the complainant's right to take legal action remains unaffected by the existence or use of any complaints procedures referred to above. In addition, if the complainant remains dissatisfied with the Final Response of the Company or in case of no Final Response within the three (3) months' time-frame, he/she may be entitled to take his/her Complaint to the [Financial Ombudsman of Cyprus](#), by quoting his/her Complaint's unique reference number.

Questions regarding the Client Complaints Policy may be sent to the Customer Support Department in writing via the "[Contact Us](#)" page on our website.

As noted in section 3 of this Policy, **the Complaint Form is accessible to clients and potential clients online at all times.** The form can be viewed and downloaded from the Prime Investment platform.

5. Records and Reporting

The Complaints Department shall maintain the appropriate records in this respect and the Compliance Function shall regularly monitor and review the Company's compliance with the applicable regulatory requirements for handling client Complaints and the record-keeping held by the Complaints Department. Furthermore, the Compliance Function shall report regularly to CySEC information regarding client Complaints filed to the Company.

Prime Investment Limited is authorised and regulated by the Cyprus Securities and Exchange Commission, CIF Licence No 250/14.



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