

# COMPLAINT POLICY AND PROCEDURE

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## 1. INTRODUCTION

WRDNB Ltd (hereinafter, "WRDNB" or the "Company") is a Cypriot Investment Firm incorporated and registered under the laws of the Republic of Cyprus, with registration No. HE 297365. The Company is authorised and regulated by the Cyprus Securities and Exchange Commission (hereinafter, the "CySEC") under the license No. 000/22.

The Investment Services and Activities and Regulated Markets Law of 2017 (L.87(I)/2017 regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets), including all its amendments and the Directives issued by CySEC (the "Regulations") are the regulatory framework that the Company abides to.

In accordance with paragraph 13 of DI144-2007-01 of 2011 and CI144-2012-05, the Company has to maintain an effective and transparent procedure for handling complaints and grievances from its clients. The Company keeps records of each complaint or grievance including measures taken for its respective resolution.

The Company has proceeded with establishing the present procedure/policy which includes provisions for the prompt, proper, efficient and adequate resolution of clients' complaints.

## 2. DEFINITION

The Company considers as a complaint an expression of dissatisfaction by a client regarding the provision of investment and/or ancillary services provided by the Company, based on actual or supposed/claimed circumstances that have caused hardship or harm to its originator, received in writing by the Company.

## 3. PROCEDURE

### 1) **Receipt of Complaint**

The Company has implemented adopted the present policy in order to ensure efficient and fair process for handling complaints that may arise from its business relationship with its clients.

Clients may submit their complaint in writing, and are encouraged to use the Complaints Form found at the end of the present policy and submit it electronically at one of the following email addresses, as applicable:

1. [inf@invexia.com](mailto:inf@invexia.com) for general and technical problems
2. [complaints@invexia.com](mailto:complaints@invexia.com) for regulation disputes

The Head of Customer Support/Head of Back Office shall deal with clients' complaints unless in cases when a conflict of interest might arise. In such cases the Managing Director and/or the Compliance Officer shall deal with the complaint. In case the client does not consider that the Customer Support Department or Back Office Department has solved the complaint, then they may contact the Compliance Officer directly.

### 2) **Acknowledging of Complaint**

The Company acknowledges receipt of the client's complaint within five (5) working days, whilst providing the unique reference number to the client clearly mentioning that the client should use the said reference number in all future contact with the Company, the Financial Ombudsman and/or the CySEC regarding the specific complaint (see below for issuing this number to a complaint).

In case when due to the nature of the complaint/grievance, more time is required, the Head of Back Office informs the Managing Director and the Compliance Officer, who should fully investigate the complaint/grievance in coordination with the Head of the Department involved and if deemed necessary, with the Compliance Officer and the legal advisor.

A holding response will be issued to the client within four (4) weeks of receiving the complaint if no final resolution can be issued at that time.

In case where the complainant responds, a **Further Acknowledgement** will be proposed in the next five (5) business days.

### **3) Handling of Complaint**

The Company will endeavor to issue a final resolution no later than two (2) months from the date that the initial complaint was submitted. During the investigation of the complaint, the Company informs the complainant of the handling process of the complaint.

In case a Client complaint is not settled within the two (2) month period, the Company will still send a written response informing the Client about the status of their complaint. In the event that the Company is unable to offer a resolution to the Client's complaint within the required two (2) month period, it will contact the client explaining the reasons of its inability to offer a solution and present an alternative date on which the solution will be given. The new date cannot be later than three (3) months from the submission of the complaint by the client.

The full complaint procedure maintained by the Company is publicly available on the Company's Website, Section 21 of the Terms and Conditions.

### **4) Final Decision**

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

If client is not satisfied with the Company's final decision they may check with the office of the Financial Ombudsman of the Republic of Cyprus in case they are eligible to file a complaint with them and seek mediation for possible compensation. It is important to inform clients that they must 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 the client's complaint.

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

Client may maintain his/her complaint with the CySEC. However please note that CySEC 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.

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

Fax: +35722506700

## 4. RECORDS AND REPORTS

The Company shall keep detailed documentation of all complaints and grievances and shall duly report the relevant cases to CySEC. These reports shall be submitted on a monthly basis by the Compliance Officer (see below).

The client shall receive a full copy of the complaint and all related records. Another copy shall be kept in clients' file with the Company. In cases when the complaint involves the Managing Director, it shall be mentioned in the Annual Report.

## 5. ISSUING THE UNIQUE REFERENCE NUMBER

The Company (Back Office or Compliance Officer) will register the complaints it receives in an internal register in the following manner.

Each complaint will have a unique reference number, consisting of ten digits in the following format:

- **MPYYYY0000**

Where:

- the first two digits are the code of the Company regarding the Transaction Reporting System - TRS
- the following four digits define the year
- the last four digits denote the number of each complaint serial number (e.g. 0001, 0002, 0125 etc).

An example of a valid reference number: **MP20180003** (third complaint received in 2018).

This number is always communicated to the client as soon as it is issued.

## 6. SUBMISSION OF INFORMATION TO THE CYSEC

The Compliance Officer will complete the CySEC complaints report form T144-002-01 on a monthly basis and send it to the CySEC within five (5) days after the reporting month, through the CySEC's TRS Server.

If no complaints were submitted for the reporting month then the necessary fields on form T144-002-01 should be filled and uploaded to CySEC's TRS Server.

## 7. UPDATES

The Company will perform a periodical review of this Policy, at least once a year. The Policy is in line with the Company's operational model, and therefore in case of any changes in the operations, these will be properly reflected in this policy.

## 8. COMPLAINTS FORM

This is the Form clients need to fill in if they wish to submit a complaint to the Company. It should be completed with up to date as well as accurate information for the proper investigation and evaluation of the client's complaint.

The Company may request further information and/or clarifications and/or evidence as regards the client's complaint.

**DATE:**

**CLIENT INFORMATION**

Name: .....

Surname: .....

ID or Passport Number: .....

Country of nationality: .....

Legal Entity Name (in case the Client is a legal person):.....

Account Trading Number:.....

**CONTACT DETAILS OF THE CLIENT**

Postal Address:.....

City/Province:.....

Code: Country:.....

Telephone Number:.....

Email:.....

Please advise your most convenient method of communication:.....

DETAILS OF THE COMPLAINT

Date when the Complaint was created:.....

Employee who offered the services to the Client:.....

Description of the Complaint: (use a separate sheet if necessary).....

**I hereby certify and confirm that to the best of my knowledge, the information furnished above is true, accurate, correct and complete.**