

CLIENT COMPLAINT POLICY

Leverate Financial Services Limited (hereinafter, the “Company”) is an Investment Firm regulated by the Cyprus Securities and Exchange Commission (hereinafter, “CySEC”) with license number 160/11.

The Client Complaint Policy (hereinafter, the “Policy”) sets out the processes employed when dealing with complaints received from Clients.

DEFINITION OF A COMPLAINT

A complaint is an expression of dissatisfaction by a Client regarding the provision of investment and/or ancillary service by the Company. A complainant is any person, natural or legal person who is presumed to be eligible to have a complaint considered by a firm and who has already lodged a complaint. In case the Company receives a notice through the line of communication established by the Company to receive complaints, but which does not fall within the definition of “complaint” above and can be characterized as an enquiry; this shall be categorized as an enquiry rather than a complaint and will be forwarded to the relevant department to be handled accordingly. The complainant maintains the right to request the re-classification of his enquiry as a complaint.

This Policy is in addition to the Company’s overarching general obligation to act honestly, fairly and professionally and in the best interests of its Clients and to comply, in particular, with the principles set out in the above legislation when providing investment services and other ancillary services.

SUBMITTING YOUR COMPLAINT

In order to submit a complaint to the Company, you are kindly requested to email compliance@leverate.com. Please note that the Company may not accept complaints submitted to it by any other mean/method/email (i.e. different email, telephone, etc.). For any further assistance please contact compliance@leverate.com and/or support@leverate.com.

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

ACKNOWLEDGE YOUR COMPLAINT

We will acknowledge receipt of your complaint within five (5) business 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.

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, we will keep you updated of the handling process of your complaint. Our Compliance Department will contact you directly via email 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 other 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 requests within the period of three (3) months from the date of submission of your complaint. In cases that you will provide us with a valid reason for not responding to our requests within the said period (3 months), the Company shall reopen the relevant investigation in good faith.

FINAL DECISION

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

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 our final response from the Company, otherwise the Financial Ombudsman of the Republic of Cyprus may not be able to deal with your complaint.

CONTACT DETAILS OF THE FINANCIAL OMBUDSMAN OF THE REPUBLIC OF CYPRUS:

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

Email: complaints@financialombudsman.gov.cy

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

Telephone: +35722848900

Fax: +35722660584, +35722660118

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>

Email: info@cysec.gov.cy

Postal Address: 19 Diagorou Street, 1097 Nicosia, Cyprus

88 Ayias Fylaxeos street, Zavos City Center, 4th Floor, 401, Limassol 3025, Cyprus - P.O.B. 56942 Cyprus 3311

Leverate Financial Services Ltd is Regulated by CySEC, License No. 160/11

You may maintain your complaint with the Cyprus Securities and Exchange Commission, however, 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 procedures referred to above.

RECORD KEEPING

The Company shall document and keep in its records the following information:

- a. The identity of the complainant who filed the complaint
- b. The name of the employee who undertook to provide the service to the complainant
- c. The date of receipt of complaint/enquiry
- d. The subject and full description of the complaint/enquiry
- e. The remedial action taken, and/or further clarifications provided to the complainant

ALTERNATIVE DISPUTE RESOLUTION

Pursuant to Art. 26 par. 5 of the Delegate Regulation (EU) No. 2017/565, the complainant might use an alternative dispute resolution entity as defined in Article 4(h) of Directive 2013/11/EU of the European Parliament and the Council on consumer ADR.

The European Commission has set up an online dispute settlement platform: <https://ec.europa.eu/consumers/odr/main/?event=main.home2.show%20%20>

The online dispute settlement platform can be used by Clients for out-of-court settlement of disputes arising from sales contracts or service contracts concluded online.