

# COMPLAINTS MANAGEMENT POLICY

## 1. Introduction

- 1.1. REDFIN CAPITAL LTD is a Cyprus Investment Firm registered with the Registrar of Companies in Nicosia under the number HE 381021 and authorized and regulated by the Cyprus Securities and Exchange Commission under the license number 375/19 (hereinafter called the "**Company**").

## 2. Scope

- 2.1. The Policy sets out the processes employed when dealing with Complaints received from Complainants.

## 3. Definitions

- 3.1. A Complaint for the purpose of this Policy is defined as any expression of dissatisfaction whether justified or not, from or on behalf of a person about the provision of, or failure to provide, an investment service and/or perform an investment activity.
- 3.2. A Complainant for the purpose of this Policy is any person, natural or legal, who is eligible for lodging a Complaint to the Company and who has already lodged a Complaint.

## 4. How to Make a Complaint

- 4.1. Clients who wish to file a Complaint must do so by submitting their Complaint, along with any relevant information, as follows:
  - (a) Either, via email to [complaints@redfincapital.com](mailto:complaints@redfincapital.com); or
  - (b) Through post to the Company's address: 19 Karaiskaki Str. Roussos Building, Office 1A, Limassol, 3032, Cyprus. The letter shall be addressed to the Company's Compliance Officer.
- 4.2. All Complaints will be handled by the Compliance Officer of the Company and any action taken shall be in accordance with this Policy.
- 4.3. Upon receipt of a Complaint we gather and investigate all relevant evidence and information regarding the Complaint. The following information and documentation should, wherever possible, be provided to the Compliance Officer of the Company as part of your formal Complaint, in order to ensure that the Complaint is addressed in the most efficient and fair manner:
  - (a) Account Number;
  - (b) Date the problem/incident first occurred;
  - (c) Short summary of the Complaint;
  - (d) Disputed amount and currency, if any;
  - (e) Attachments of any documentation or other information that may assist in the resolution of the Complaint.

- 4.4. Upon receipt of a Complaint, a written acknowledgment will be sent to you within 3 (Three) working days. This will confirm that we are taking the necessary action needed to resolve the Complaint, and will also provide a timescale for our response. You will also be informed of the unique reference number for your Complaint which you will be able to use for future correspondence with our Company, the Cyprus Securities and Exchange Commission (CySEC) and/or the Financial Ombudsman of the Republic of Cyprus (FOS) regarding your Complaint.

## **5. How We Deal With Your Complaint**

- 5.1. During the investigation of the Complaint and no later than 20 (Twenty) working days after the Complaint was received we will send you our final response and, if appropriate, any offer of redress. Our final response will include details on how to contact the FOS if the Complaint has not been resolved to your satisfaction or, if the offer of redress is considered insufficient or inappropriate.
- 5.2. This may not always be possible as sometimes the complexity of the Complaint may require more time to investigate fully. If, for any reason, the Company is not in a position to make a final response to the Complainant within 20 (Twenty) working days after the receipt of the Complaint, the Company will provide a justification to the Complainant and indicate when we expect to be able to provide a response. Moreover, the Company will inform the Complainant that he/she may now refer the Complaint to the FOS.

## **6. Submission of Complaints to the Financial Ombudsman Service and/or CySEC**

- 6.1. If the Complaint cannot be resolved internally by us in accordance with our Policy set out herein, Complainants may refer the matter to the approved dispute resolution scheme, if they so wish.
- 6.2. Complainant can refer their Complaint to the FOS if they are dissatisfied with our assessment and ruling.
- 6.3. If you wish to refer your Complaint to the FOS, please see below the relevant contact details:

Address: 13 Lord Byron Avenue, 1096 Nicosia, Cyprus

Phone: +357 22848900

Facsimile (Fax): +357 22660584, +357 22660118

E-mail: Complaints: [complaints@financialombudsman.gov.cy](mailto:complaints@financialombudsman.gov.cy)

Financial Ombudsman: [fin.ombudsman@financialombudsman.gov.cy](mailto:fin.ombudsman@financialombudsman.gov.cy)

Website: [www.financialombudsman.gov.cy](http://www.financialombudsman.gov.cy)

- 6.4. You should submit your Complaint to the FOS within 4 (Four) months from the date you receive our final response or at the latest by the end of 3 (Three) months from the date we received your Complaint in the case you do not receive our final response.
- 6.5. FOS may not be able to help if you have previously addressed your Complaint in writing to the Company, within 15 (Fifteen) months from the date you became aware or reasonably should have become aware of the damaging act or failure of the Company or the fact that you had reason for submitting a Complaint.
- 6.6. If you do not want to accept a decision taken by the FOS, as a last resort you may be able to take your case to court.

6.7. In addition to the above, you may also inform CySEC about your complaint. More information about the process can be found at <https://www.cysec.gov.cy/en-GB/complaints/how-to-complain/>.

6.8. It should be noted that CySEC does not have restitution powers and therefore does not investigate individual complaints. However, all complaints submitted to the CySEC are taken into consideration by the CySEC in the performance of its supervisory mandate.

## **7. Monitoring and review**

7.1. The Company shall maintain records of all complaints received for a minimum period of seven years after the termination of the business relationship with the Complainant.

7.2. The Company shall regularly monitor the effectiveness the current Policy as well as perform root-cause analysis on each Complaint received in order to be able to identify any shortfalls in its controls or procedures, if any, and take the necessary remedial measures.

7.3. We shall inform you of any material change to this Policy either in writing or via email.