

CUSTOMER COMPLAINTS PROCEDURE

Purpose

Bogofinance Capital Markets Ltd (hereinafter referred to as the “Company’ or FXJET’) is a Cyprus Investment Firm licensed. **FXJET** is owned as a trade name by Bogofinance Capital Markets LTD which is regulated by the Cyprus Securities and Exchange Commission (CySEC) under the license number 321/17. The Company is located at 132 Makariou III Avenue, Office 101, 3021 Limassol, Cyprus.

FXJET ensures that its current complaints process is applicable for all categories of clients. Resolution of client complaints is achieved without undue delay, taking into consideration the seriousness of the complaint as well as the financial implications this may have to both the client as well as the Company. This Complaints Policy and the Company’s Internal Complaints Handling Policy gathers all necessary information and uses the measures taken by the Company in order to solve potential inconveniences, complaints and/or grievances that might occur among the business relationship between the client and the Company.

Complaint: is an expression of dissatisfaction by a client related to the provision of investment and/or ancillary services provided by the Company.

Grievance: is a hardship suffered, which constitutes the grounds of a complaint.

Upon receipt of the relevant form by the Company, a written confirmation-of-receipt will be sent by Compliance Department informing the Client of relevant investigations and procedures followed for resolution.

Operational Procedure

For the efficient handling of “complaints” or “grievances” the Company has designed a clear, simple and fair complaint handling procedure.

The Compliance Officer shall be responsible for handling Client complaints, except in the case where the complaint involves the Compliance Officer, whereby the complaint shall be handled by the Managing Director.

The Company tries to ensure independence via the Compliance Officer which enables complaints to be investigated fairly and possible conflicts of interest to be identified and mitigated.

Operational procedures for the receipt and handling of complaints and/or grievances received by the Company are outlined in the Internal Operations Manual of the Company (hereinafter referred to as the “**Manual**”). The Manual is based on applicable legislative requirements, as well as, Circulars, Guidelines and Directives issued by the Cyprus Securities & Exchange Commission (hereinafter referred to as the “**CySEC**”), in accordance with which the following, non-exhaustive list of information, shall be collected and recorded at a minimum:

- Date of receipt and of registration of the complaint;
- Details of the client that made the complaint;
- ID/Passport Number;
- Country of Residence of the Complainant;
- Service/department to which the complaint relates to;
- Details of the Company’s employee responsible for the service/s rendered to the client;

- Content of the complaint;
- Complaint cause;
- Financial instrument involved – where and if applicable;
- Disputed amount – where and if applicable on the services provided;
- Settlement date – where and if applicable on the services provided;
- Magnitude of the damage which the client claims to have suffered or which can be presumed to have suffered on the basis of the contents of the complaint – where and if applicable on the services provided;
- Date of the Company’s answer;
- Briefly, the content of the Company’s written response to the complaint lodged;
- Reference to any correspondence exchanged between the Company and the Client which should be attached to the Company’s file and the Complaints Book Register.

Brief Description of the Procedures of Submission, Receipt and Handling clients Complaints

1. Client Complaints Form Submission

Clients may submit a complaint to the Company by using the relevant form published within the Company’s official website, namely the **‘Client Complaint Reporting Form’** as per Annex 1 herein.

However, a “complaint” or “grievance” shall not be considered to fit the interpretation of a “complaint” or “grievance” and, therefore, will not be considered as such and will not be examined (and the Client who has filed it will not be informed), if one or more of the following conditions apply:

- The “complaint” or “grievance” was not filed in accordance with the procedure included herein –
- The “complaint” or “grievance” includes offensive language directed to the Company and/or to one or more of its employees and/or directors

In the circumstances:

- A. The Client is kindly requested to duly complete the above-named form, providing all relevant and applicable to his/her situation requested information, duly execute the form and/or stamp the form as applicable.
- B. The Form must be sent to the Company either via email at compliance@fxjet.com which solely belongs to the Company’s Compliance Department, or by fax to +357 25 249009.
- C. Should the Client wish to forward the Form via post to the Company’s registered address, he/she may do so, provided that the letter is officially register via post and specifying at all times *‘Private & Confidential, FAO ‘Head of Compliance’*. Such letters may be forwarded to the Company’s registered address at FXJET, Arch Makariou III Avenue 134, Yiota Court, Office 101, 3021 Limassol, Cyprus, P.O. Box 51181, FAO Head of Compliance Department.
- D. In the cases where a **Client Complaint Reporting Form** is received and is deemed valid by the Head of the Compliance Department, the Company shall take such necessary action and steps together with relevant Heads of Department(s) to which the complaint or grievance refers to, in order to identify and verify:
 - Reasons for failure of procedure followed;
 - Weaknesses of the internal controls;
 - Implementation of internal controls that would prevent any complaint or grievance in the future.

In the cases where a **Client Complaint Reporting Form** is received and is deemed invalid by the Head of Compliance, the Company shall take such necessary action and steps to notify and inform the Client on how to proceed with submitting a valid Client Complaint Reporting Form. Following the completion of any investigation by the Compliance Department, the results will be included in the Internal Complaints Handling Form and Client Complaints Book Register as well as the personal Client File.

2. Client Complaint Reporting Form Receipt & Handling

All Formal Complaints/Grievances **must be forwarded** to the Company's Compliance Department in writing, at all times and in the manner set forth above, for action in accordance with the procedures described below.

Following receipt of the Client Complaint Reporting Form by the Company, the Client shall receive a **Complaints Acknowledgement** indicating the expected timeframe for investigation and resolution of the issue/inconvenience/complaint/grievance at hand.

For Forms received via e-mail and/or fax, the **Complaints Acknowledgement** to the Client shall be in writing **at all times** sent by e-mail or fax within the next **five (5) working/business days** from receipt of such Form by the Client.

For Forms received via registered post a written **Complaints Acknowledgement** shall be sent via registered post to the same address within the next **five (5) working/business days** from receipt of such Form by the Client.

The written **Complaints Acknowledgement** shall notify the Client of his/her **Unique Reference Number (URN)** which must be used in all future contact/communications with the Company, the Financial Ombudsman and/or the CySEC regarding the specific complaint. This **Complaints Acknowledgement** will also confirm that the Company is taking all possible and necessary action(s) needed to resolve the issue/inconvenience/complaint/grievance at hand, providing also an approximate timescale required in order to do so. The Company shall further confirm who shall be or who is dealing with the issue/inconvenience/complaint/grievance at hand and how the Client can contact them further. It should be noted that, since the Compliance Department is in charge to deal with such Forms, the person will normally be the Head of the Compliance Department or someone from our Senior Management personnel.

The Company will investigate the issue/inconvenience/complaint/grievance at hand and will aim towards a final resolution of any issue/inconvenience/complaint/grievance at hand and reply **within a maximum of two months (2 months)** period from the initial Client Complain Reporting Form receipt in relation to the possible reasons that caused the issue at hand and the outcome/decision. During the period of time of the investigation, the Company will inform/update the Client of the handling process. In the event that the Company is unable to respond within two months, the Client will be notified of the reasons for the delay and further indication will be provided on the period of time within which it is possible to complete the investigation. This period of time cannot exceed the three months in total **(3 months)** from the submission of the Client Complain Reporting Form initially.

Should the Client feel dissatisfied with the Company's assessment and resolution and the Complaint relates to possible compensation claim, we hereby inform the Client that he/she has the right and encourage him/her to refer the Complaint to '**The Financial Ombudsman of the Republic of Cyprus**' which is the competent body to examine compensation claims via an extrajudicial procedure. Should the Client consider submitting such a

complaint to the Financial Ombudsman in writing either by post or by e-mail, the following information may be of use:

The Financial Ombudsman of the Republic of Cyprus

Address: 13 Lord Byron Avenue, 1096, Nicosia, Republic of Cyprus

Telephone: +357 22848900 (main number)

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

E-mail:

- ❖ Complaints: complaints@financialombudsman.gov.cy
- ❖ Financial Ombudsman: fin.ombudsman@financialombudsman.gov.cy
- ❖ Official Website: www.financialombudsman.gov.cy

The Cyprus Securities and Exchange Commission (CySEC)

Address: 19 Diagorou Str. CY-1097 Nicosia, P.O BOX 24996, 1306 Nicosia

Telephone: +357 22506600(main number)

Facsimile:+357 22506700

Additional information as to the procedure you need to follow can be found on <http://www.cysec.gov.cy/en-GB/complaints/how-to-complain/>.

Record Keeping

The Company shall maintain a record of all complaints and related details for a minimum period of **five (5)** years following the termination/resolve of a business relationship and in accordance with applicable legislative requirements.

Annual Review/Update of this Policy

The Company reserves the right to amend its policies at any time by making them public on its official website. Policies shall be reviewed/amended annually and/or as and when it is deemed necessary by Regulatory Authorities and the Compliance Officer and further approved by the Board of Directors. In the event that, the Company materially changes this Policy, including how it collects, processes or uses clients' personal information, the revised Complaints Policy will be uploaded on the Company's official website. In such a case, the latest version of the policy published on the official website of the Company shall prevail. As such, Clients hereby consent, agree and accept that, posting of a revised Complaints Policy electronically on the Company's official website forms the actual notice of the Company to its Clients. The Company encourages its Clients to periodically review this Complaints Policy so that they are always aware of what information the Company collects, how it uses it and to whom it may disclose it, in accordance with the provisions of this Policy. Any dispute over the Company's Complaints Policy is subject to this notice and the Client Agreement. Please contact us at compliance@fxjet.com should you require additional clarification and/or further information, inquiries and/or questions.

Annex 1

Client Complaint Reporting Form

CONFIDENTIAL

Unique Reference Number (URN): _____
(Leave blank – for Internal Use)

Instructions to Client

- A.** You are kindly requested to duly complete the information requested below, providing all relevant and applicable information, duly execute the form and/or stamp the form as applicable.
- B.** The Form must be sent to the Company either via email at compliance@fxjet.com which solely belongs to the Company's COMPLIANCE Department, or by fax to +357 25 249009.
- C.** Should the Client wish to forward the Form via post to the Company's registered address, he/she may do so, provided that the letter is officially registered via post and specifying at all times 'Private & Confidential, FAO Head of Compliance Department'. Such letters may be forwarded to the Company's registered address at FXJET, Arch Makariou III Avenue 134, Yiota Court, Office 101, 3021 Limassol, Cyprus, P.O. Box 51181, FAO Head of Client Services Department.

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- 1. Complaint Date: / / (DD/MM/YYYY)
 - 2. Client Full Name & Patronymic (if and where applicable):
 - 3. Authorised Representative Full Name & Patronymic (if and where applicable):
 - 4. ID/Internal or International Passport Number:
 - 5. Country of Residence of the Complainant:
 - 6. E-mail Address:
 - 7. Phone Number:
 - 8. Does your complaint involve a financial loss? Yes No
 - 9. If your answer in point 8 above is "Yes" kindly provide the estimated amount of loss in the 'Disputed Amount' section below
 - 10. Specify the Department and/or Employee involved (if applicable/possible):

Kindly provide details in relation to your Complaint:

Complaint Cause –*Please choose one or more of the following options:*

- Reception & Transmission of Order(s) (RTO) (e.g., delay, wrong price etc.);
- Execution of Order(s) (e.g., delay in execution, re-quotes, slippage, erroneous trades etc.);
- Quality or lack of information provided to the client;
- Terms of contract/fees/charges (including withdrawal problems, cancelation of profits etc.);
- General administration/customer services (including custody/safekeeping services where applicable);
- Unauthorised business being offered or carried out;
- Other (**please specify in comments section below**). The 'other' option should only be used after ensuring that the Complaint Cause does not fall under any of the above categories. If this option is used, then a short and detailed description is expected in the 'Complaint Cause Comments' below.

Complaint Cause Comments

Financial Instruments – You may choose more than one of the following categories:

- Financial contracts for differences (CFDs)– FX;
- Financial contracts for differences (CFDs) – Indices;
- Financial contracts for differences (CFDs) – Commodities;
- Financial contracts for differences (CFDs) – Stocks
- Financial contracts for differences (CFDs) – Cryptocurrencies;
- Other investment products/funds *(please specify in comments section below)*.The ‘other’ option should only be used after ensuring that the Financial Instrument does not fall under any of the above categories. If this option is used then a short and detailed description is expected in the ‘Financial Instruments Comments’.

Financial Instruments Comments - Should only be used if ‘other’ category was selected in previous column

Disputed Amount -Amount should be provided in Euros (no decimals)

Yes **No** *(If Yes, please specify)*

Full Name/Capacity: _____ **Signature:** _____

Important Notes:

- Upon receipt of this form, a written Acknowledgment e-mail will be sent to you within the next **five (5) working/business days**.
- This Acknowledgement e-mail will further notify you also of your **Unique Reference Number (URN)** which must be used in all future contact with the Company, the Financial Ombudsman and/or the CySEC regarding the specific complaint.
- The Company will investigate your complaint and will aim towards a final resolution of any issue/complaint/grievance and reply **within a maximum of two months (2 months)** period from the initial complain receipt in relation to the possible reasons that caused the issue at hand and the outcome/decision.

- During this period of time of the investigation of the complaint, the Company will inform/update you of the handling process in regular intervals.
- In the event that the Company is unable to respond within two months, you will be notified of the reasons for the delay and further indication will be provided on the period of time within which it is possible to complete the investigation. This period of time cannot exceed the three months (**3 months**) from the submission of your initial complaint.
- Should you feel dissatisfied with our assessment and your complaint relates to possible compensation claim, we would like to inform you that you have the right and encourage you to refer the Complaint to 'The Financial Ombudsman of the Republic of Cyprus' which is the competent body to examine compensation claims via an extrajudicial procedure. Further information can be found within our Complaints Policy published within our official website at www.fxjet.com.