



*Authorised as Cypriot Investment Firm
Regulated by the Cyprus Securities and
Exchange Commission
License Number: 081/07*

COMPLAINTS POLICY

2021

1. General Obligations

Ronin Europe Limited (hereinafter the “**Company**”) implements and maintains effective and transparent procedures for the reasonable and prompt handling of complaints or grievances received from clients and keeps a record of each complaint or grievance and the measures taken for the complaints resolution under article 26 of EU Regulation 565/2017 titled “Organizational requirements and operating conditions for investment firms and defined terms” and Cyprus Securities and Exchange Commission (hereinafter the “**CySEC**”) Circular titled: “Guidelines on complaints-handling for the securities sector – Handling of client’s complaints by CIFs” (hereinafter the “**Circular**”) under which CySEC adopts in its supervisory practices the Joint Committee guidelines on complaints-handling for the securities and banking sectors JC 2018 35 (hereinafter the “Complaints Handling JC Guidelines”).

2. Complaint form

The complainant client may find the complaint form at the web-site of the Company <https://ron.in/en/europe/what-mifid/> and sent at Ronin_Compliance@europe.ron.in or by fax to +357 25 878291 or via post to Pythagoras 3, Pythagoras Court, Office 301, 3027 Limassol, Cyprus.

3. Content of the Complaint

The claimant client should draft the complaint with a clear content including dates and times of facts that are correlated with the complaint and in a chronological order. The claimant client should mention the relevant Department/employee (if any) that is linked with this complaint. The claimant may also state what outcome/remedy may satisfy him/her. He/she must add along with his/her complaint the supporting documents (if any) and any communication e-mails with the Company that are related with the complaint under review. The claimant is strongly advised to read carefully the Complaints Policy of the Company before drafting the complaint.

4. Maintenance of internal register

1. For the purposes of compliance with the applicable regulations, the Company registers any complaints it receives as soon as possible in its internal register with an appropriate manner for easy reference and retrieval. Specifically, upon receiving the complaint, the

Company registers the complaint directly to its internal register, giving it a unique reference number. The unique reference number is consisted of ten digits:

- i) the first two digits are the code of the Company regarding the Transaction Reporting System – TRS,
- ii) the following four digits define the year, and
- iii) the last four digits denote the number of each complaint serial number.

2. The Company accumulates the following data when a complaint is addressed to the Company:

- a) name/corporate name of the complainant,
- b) registered address,
- c) name of the legal representative of the client who signed the complaint form,
- d) passport number of the legal representative or the person who signed the complaint form,
- e) date of receipt of the complaint,
- f) date of registration in the Company's internal register,
- g) investment service and financial instrument to which the complaint refers to,
- h) department and employee which the complaint refers to,
- i) content of the complaint,
- j) company's answer to the complainant and date of the answer,
- k) disputed amount (if any).

5. Communication with the Client

1. The unique reference number is communicated to the complainant client.
2. The Company informs the complainant client that shall use the said reference number in all future contact with the Company, the Financial Ombudsman and/or the CySEC regarding the specific complaint.
3. The Company confirms, within five days, the receiving of the complaint to the complainant client.
4. The Company investigates the complaint and replies, within two months, to the complainant about the outcome/decision.
5. During the investigation of the complaint, the Company informs the complainant of the handling process of his/hers complaint.
6. In the event that the Company is unable to respond within two months, it shall inform the

complainant client of the reasons for the delay and indicates the period of time within it is possible to complete the investigation. This period of time cannot exceed three months from the submission of the complaint.

6. Handling of the complaints

1. The complaint shall be sent by the client and investigated without any charge/fee imposed by the Company. The complaint will be received by the Compliance Officer of the Company Mrs. Tatiana Elkina. The Compliance Officer of the Company depending the nature of the complaint will route it to the suitably experienced officer (“responsible officer”) who is not directly involved in the matter that is the subject of the complaint (e.g. Head of Department) and inform the client about the name and contact details of responsible officer who will deal with the complaint under review. Such officer must have the authority to review, analyze, communicate with the complainant client and settle the complaint. In case the complaint concerns the Head of Compliance Department, the suitable officer will be the Executive Director. In case the complaint concerns Executive Director, complaint shall be presented to the attention of the BoD.
2. The responsible officer of the Company will proceed in the investigation of the complaint by reviewing the relevant documentation and interviewing the employee/s involved (if any). During the investigation the responsible officer may communicate with the complainant client in order to specify facts or/and the grounds of the complaint or/and settle the conflict.
3. If the responsible officer of the Company evaluates upon the investigation that the complaint is of high significance he/she must inform and forward the relevant complaint to the General Manager of the Company for further instructions or in order the complaint to be examined and resolved by the BoD itself. In any case if the complaint concerns a monetary settlement a BoD decision is required.
4. The responsible officer will draft and send the reply to the Client including the results of the investigation of the complaint and possible remedies (if any). The responsible officer is also responsible for any communication with the CySEC or/and Financial Ombudsman of the Republic of Cyprus for the complaints.
5. The Company on a risk-mitigation approach analyses, on an on-going basis, all the complaints handling data, to ensure that it shall identify and address any recurring or systemic problems, and potential legal and operational risks. To this end, the Company

analyses the causes of individual complaints so as to identify root causes common to types of complaint; it considers whether such root causes may also affect other processes or products, including those not directly complained of; finally, it corrects, where reasonable to do so, such root causes.

7. Submission of information to the CySEC

1. Every month, the Company shall provide to the CySEC information regarding the complaints it receives and how these are being handled.
2. The Company completes every month the form NO_yyyymmdd_COMP-CIF and sends it to the CySEC within five days after the reporting month. The form is sent in electronic form via the TRS. All relevant details for completing and sending the form are referred to in Annex 2 of the Circular.
3. In case where the Company will not receive any complaint within the reporting month, it has no obligation to send the relevant form to the CySEC.
4. In the event where the Company has resolved and/or revised a complaint which was referred to the CySEC in a previous submission of the above-mentioned form, the Company shall complete all the fields of the form and select the 'U' from the column Record Type.

8. Record keeping

The Company shall maintain a record of all complaints for at least five years under the relevant regulations.

9. Submission of unresolved Complaint to the Financial Ombudsman of the Republic of Cyprus

If the complainant client is not satisfied with the Company's response, or if the Company rejected the client's complaint or if the Company does not grant an answer within three months, the complainant client has the right to check with the office of the Financial Ombudsman and seek mediation for possible compensation. The Financial Ombudsman is an independent service for settling disputes between Cypriot Investment Firms and their clients.

The complainant client should contact the Financial Ombudsman within four months of receiving a final response from the Company otherwise the Financial Ombudsman may not be able to deal with the complaint. In some cases depending-inter alia- the monetary size of

the claim or the nature and characteristics of the client, the Financial Ombudsman under the applicable legislation may not have the authority to investigate the complaint and the client in such a case has the option to proceed in civil actions or other appropriate legal actions against the Company.

The Financial Ombudsman website can be accessed via: <http://www.financialombudsman.gov.cy>. The client should send his complaint at complaints@financialombudsman.gov.cy, by fax +357 22 660584 or by post to Lord Byron Avenue 13, 1096 Nicosia.

10. Submission of unresolved Complaint to the Cyprus Securities and Exchange Commission

The CySEC does not have restitution powers and therefore does not investigate individual complaints. However, all complaints submitted to the CySEC by the complainant are taken into consideration by the CySEC in the performance of its supervisory mandate.

If the complainant client is not satisfied with a financial product or service provided by the Company and also wishes to inform the CySEC about a complaint, he/she may submit it via the relevant form that can be found in <http://www.cysec.gov.cy/en-GB/complaints/how-to-complain/>.