



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

COMPLAINTS POLICY

1. General Obligations

Ronin Europe Limited (the “Company”) has established and maintains effective, transparent, and fair procedures for the prompt and consistent handling of complaints and grievances received from clients. The Company is committed to ensuring that complaints are managed professionally, impartially, and without undue delay, with the objective of achieving fair outcomes for clients and identifying opportunities to enhance its products, services, and internal controls.

The Company maintains appropriate records of all complaints received, together with the actions taken and measures implemented for their investigation and resolution. Complaint handling procedures form an integral part of the Company’s governance, compliance, and risk management framework and are designed to ensure the fair treatment of clients and compliance with applicable regulatory requirements.

This Policy has been adopted in accordance with the provisions of Directive 2014/65/EU on Markets in Financial Instruments (“MiFID II”), the Investment Services and Activities and Regulated Markets Law of 2017 (Law 87(I)/2017), Article 26 of Commission Delegated Regulation (EU) 2017/565, and the Cyprus Securities and Exchange Commission (“CySEC”) Circular entitled “Guidelines on complaints-handling for the securities sector – Handling of clients’ complaints by Cyprus Investment Firms”.

The Company further recognises that effective complaint handling contributes to the identification of operational, conduct, legal, and compliance risks and therefore performs ongoing monitoring and analysis of complaints received in order to identify recurring issues, root causes, and areas requiring corrective action or enhancement of internal procedures.

2. Definition of Complaint

For the purposes of this Policy, a complaint is any oral or written expression of dissatisfaction, whether justified or not, submitted by an existing, former, or prospective client in relation to the provision of investment services, ancillary services, or any interaction with the Company.

Requests for information, service requests, operational enquiries, technical support issues, or other routine communications that do not express dissatisfaction shall not be classified as complaints. However, where a client explicitly or implicitly expresses dissatisfaction with the Company’s services, products, conduct, employees, or the manner in which a matter has been handled, such communication shall be assessed and, where appropriate, treated as a complaint in accordance with this Policy.

All employees are required to promptly escalate any expression of dissatisfaction that may constitute a complaint to the Compliance Department without undue delay. The Compliance Department shall be responsible for determining whether the matter falls within the scope of this Policy and for ensuring that all complaints are recorded, investigated, and resolved in accordance with the applicable regulatory requirements and internal procedures.

3. Complaint Submission

Clients wishing to submit a complaint may complete the Complaint Form available on the Company's website at <https://ron.in/regulatory-framework/> and submit it to the Company by email at Ronin_Compliance@europe.ron.in, by post to 19 Promachon Eleftherias, Alpha Tower, 2nd Floor, Agios Athanasios, 4103 Limassol, Cyprus, or by telephone at +357 25 878939.

The use of the Complaint Form is encouraged, as it facilitates the prompt and efficient handling of complaints. However, the absence of a completed Complaint Form shall not prevent the Company from accepting and investigating a complaint.

Where a complaint is received verbally, including by telephone or in person, the employee receiving the complaint shall document the details of the complaint in writing and promptly forward the matter to the Compliance Department for assessment.

The Compliance Department shall determine whether the communication constitutes a complaint within the meaning of this Policy. Where the matter qualifies as a complaint, it shall be registered in the Company's Complaints Register, assigned a unique reference number, and handled in accordance with the procedures set out herein.

The Company may request additional information or supporting documentation from the complainant where necessary to facilitate a fair and thorough investigation of the complaint.

4. Content of the Complaint

The complainant should provide sufficient information to enable the Company to review, investigate, and respond to the complaint in a fair and timely manner.

The complaint should clearly describe the matter giving rise to the dissatisfaction and, where possible, include the relevant dates, times, events, transactions, communications, and any other facts in chronological order. The complainant should also identify the relevant department, service, transaction, financial instrument, or employee involved, where applicable.

The complainant may also indicate the outcome, remedy, or resolution sought from the Company. Any supporting documentation, evidence, transaction records, statements, correspondence, or other relevant information should be attached to the complaint in order to assist the Company in carrying out a thorough investigation.

Complainants are encouraged to review this Complaints Policy before submitting a complaint, so that they are aware of the Company's complaint handling process, applicable timelines, and their rights to refer the matter to the Financial Ombudsman or CySEC, where applicable.

5. Maintenance of internal register

5.1. For the purposes of complying with applicable legal and regulatory requirements, the Company maintains a Complaints Register in which all complaints received are recorded promptly upon receipt.

The Complaints Register is maintained in a manner that facilitates efficient monitoring, retrieval, reporting, and regulatory oversight.

Upon receipt of a complaint, the Company shall register the complaint in the Complaints Register and assign a unique reference number, which shall be communicated to the complainant and used in all subsequent correspondence relating to the complaint.

The complaint reference number consists of ten digits and is structured as follows:

- 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.

5.2. The Company shall maintain sufficient information in the Complaints Register to enable effective management, investigation, monitoring, and reporting of complaints. The following information shall be recorded, where applicable:

- a) the name or corporate name of the complainant;
- b) the registered or residential address of the complainant;
- c) the name of any legal representative acting on behalf of the complainant;
- d) the identification or passport number of the complainant or authorised representative;
- e) the date on which the complaint was received;
- f) the date on which the complaint was recorded in the Complaints Register;
- g) the investment service, ancillary service, or financial instrument to which the complaint relates;
- h) the relevant department, business unit, or employee involved;
- i) a summary of the complaint and the issues raised;
- j) the Company's response, including the date of the response and the outcome of the investigation;
- k) the disputed amount, where applicable;
- l) the complainant's email address and other relevant contact details;
- m) the country of residence or incorporation of the complainant;
- n) the complaint category, classified in accordance with the categories prescribed by the applicable CySEC reporting requirements;
- o) the financial instrument to which the complaint relates, classified in accordance with the applicable CySEC reporting requirements;
- p) the date of settlement or resolution, where applicable;
- q) the status of the complaint (e.g. open, under investigation, resolved, closed, referred to the Financial Ombudsman or other authority); and

r) any corrective actions, remedial measures, compensation payments, or lessons learned arising from the investigation.

The Complaints Register shall be maintained by the Compliance Department and shall be subject to periodic review to ensure completeness, accuracy, and compliance with applicable regulatory requirements.

6. Communication with the Client

Upon registration of a complaint, the Company shall assign a unique reference number and communicate it to the complainant. The complainant shall be requested to quote this reference number in all future communications with the Company and, where applicable, with the Financial Ombudsman of the Republic of Cyprus and/or the Cyprus Securities and Exchange Commission (“CySEC”) in relation to the specific complaint.

The Company shall acknowledge receipt of the complaint in writing within five business days of its receipt. The acknowledgement shall confirm that the complaint has been received and is being investigated in accordance with the Company's complaints handling procedures.

The Company shall investigate all complaints fairly, consistently, and without undue delay. A final response setting out the outcome of the investigation and the Company's decision shall be provided to the complainant within two months from the date of receipt of the complaint.

Where appropriate, the Company may communicate with the complainant during the course of the investigation to request additional information, clarify facts, or provide updates regarding the progress of the complaint handling process.

If, due to the complexity of the matter or other exceptional circumstances, the Company is unable to provide a final response within the two-month period, it shall inform the complainant in writing of the reasons for the delay and provide an indication of when the investigation is expected to be completed. In any event, the final response shall be provided no later than three months from the date of submission of the complaint.

The Company is committed to ensuring that all complainants are treated fairly and with due consideration of their individual circumstances. Reasonable steps shall be taken to identify vulnerable clients and to ensure that complaints submitted by such clients are handled in an appropriate, sensitive, and supportive manner. Where necessary, the Company may provide additional assistance or alternative means of communication to facilitate the effective handling of the complaint and ensure that the complainant fully understands the process and outcome.

7. Handling of the complaints

Complaints may be submitted by clients free of charge and shall be handled fairly, independently, and without undue delay. Upon receipt, the complaint shall be forwarded to the Head of Compliance or the Compliance Officer, who shall assess the nature of the complaint and appoint a suitably

experienced and impartial individual (the “Responsible Officer”) to investigate the matter.

The Responsible Officer must not have been directly involved in the circumstances giving rise to the complaint and shall possess the necessary authority, expertise, and independence to review the complaint, conduct the investigation, communicate with the complainant, and recommend an appropriate resolution. The complainant shall be informed of the name and contact details of the Responsible Officer assigned to the case.

Where a complaint concerns the Head of Compliance, responsibility for the investigation shall be assigned to an Executive Director. Where a complaint concerns an Executive Director, the matter shall be escalated directly to the Board of Directors (“BoD”).

The Responsible Officer shall investigate the complaint thoroughly and objectively by reviewing all relevant records, documentation, communications, and transactions and, where necessary, interviewing employees or other persons involved in the matter. During the investigation, the Responsible Officer may communicate with the complainant to obtain additional information, clarify relevant facts, discuss the issues raised, or explore potential resolution options.

To ensure appropriate oversight and timely resolution, the following escalation framework shall apply:

Tier 1 – Responsible Officer

All complaints shall initially be handled by the Responsible Officer, who shall be responsible for conducting the investigation, maintaining communication with the complainant, and proposing an appropriate resolution within the applicable regulatory timeframes.

Tier 2 – General Manager

Complaints involving significant legal, regulatory, financial, operational, or reputational implications, or complaints that cannot reasonably be resolved within the standard investigation period, shall be escalated to the General Manager without undue delay and, in any event, within five business days of such determination. The General Manager may provide additional guidance, require further investigation, or refer the matter to the Board of Directors.

Tier 3 – Board of Directors

The involvement of the Board of Directors shall be mandatory where:

- the complaint involves a proposed monetary settlement or compensation payment;
- the complaint is referred by the General Manager for consideration by the Board;
- the complaint presents significant legal, regulatory, financial, or reputational risks to the Company; or
- the complaint remains unresolved within the maximum regulatory response period.

Any decision of the Board relating to a complaint shall be formally documented and retained within the Complaints Register and supporting complaint file.

Upon completion of the investigation, the Responsible Officer shall prepare and issue the final

response to the complainant. The final response shall clearly set out the findings of the investigation, the Company's decision, and any remedial actions, compensation, or corrective measures proposed, where applicable. The Responsible Officer shall also act as the primary point of contact for any communications relating to the complaint with the Cyprus Securities and Exchange Commission (“CySEC”), the Financial Ombudsman of the Republic of Cyprus, or any other competent authority.

The final response shall include, where applicable:

- a) the outcome of the investigation and the reasons supporting the Company's decision;
- b) any proposed remedy, compensation, or corrective action;
- c) information regarding the complainant’s right to refer the matter to the Financial Ombudsman of the Republic of Cyprus and the applicable deadlines for doing so; and
- d) the contact details of the Financial Ombudsman.

The Company shall perform periodic analysis of complaints received in order to identify recurring issues, root causes, control weaknesses, operational deficiencies, conduct risks, and other systemic concerns. Where recurring issues are identified, appropriate corrective actions and remedial measures shall be implemented and their effectiveness monitored. The results of such analysis, together with any significant findings and recommendations, shall be reported periodically to senior management and the Board of Directors as part of the Company's governance, risk management, and compliance oversight framework.

8. Complaints Monitoring Metrics

The Company shall monitor the effectiveness, quality, and timeliness of its complaints handling arrangements through the use of appropriate Key Performance Indicators (“KPIs”) and management information. The purpose of such monitoring is to assess compliance with regulatory requirements, identify emerging risks and trends, and support the continuous improvement of the Company's complaints handling framework.

The KPIs monitored by the Company may include, among others, the timely acknowledgement of complaints, compliance with regulatory response deadlines, the number of open and outstanding complaints, complaint recurrence rates, complaints by business line, service, product, or department, complaints escalated to the Financial Ombudsman of the Republic of Cyprus or other regulatory authorities, as well as the number and nature of complaints resulting in compensation, corrective action, or policy changes.

The Compliance Officer shall review complaints data and KPI results on a periodic basis in order to identify recurring issues, emerging conduct risks, operational weaknesses, and areas requiring improvement. Significant findings, trends, and recommendations shall be reported to senior management and, where appropriate, to the Board of Directors.

The results of the KPI monitoring process shall be incorporated into the Company's broader compliance, risk management, and governance framework and shall be considered when assessing the

effectiveness of internal controls, policies, procedures, and client service standards.

9. Complaints Reporting to the Board of Directors

The Compliance Officer shall provide the Board of Directors with periodic reports, at least annually, regarding complaints received by the Company and the effectiveness of the Company's complaints handling arrangements.

Such reports shall include, where applicable, the number and nature of complaints received, complaint categories and trends, complaints resolved and outstanding, average resolution times, complaints referred to the Financial Ombudsman of the Republic of Cyprus, CySEC, or other competent authorities, any compensation, settlement, goodwill payment, or other form of redress provided, recurring root causes identified, and corrective or remedial actions implemented.

The purpose of such reporting is to enable the Board of Directors to exercise effective oversight over the complaints handling process, assess whether complaints are being handled fairly, consistently, and within applicable regulatory timeframes, and identify any recurring issues, conduct risks, operational weaknesses, or deficiencies in internal controls.

The Board of Directors shall review the adequacy and effectiveness of the Company's complaints handling framework and ensure that appropriate corrective actions are taken where deficiencies, recurring issues, or systemic concerns are identified.

Any financial compensation, goodwill payment, settlement agreement, or other form of redress proposed to a complainant shall be approved by the Board of Directors, or in accordance with any approval authority delegated by the Board. All such decisions shall be properly documented and recorded in the Complaints Register and retained in the relevant complaint file.

10. Submission of information to the CySEC

The Company shall comply with all applicable CySEC reporting requirements relating to client complaints and shall submit accurate, complete, and timely information regarding complaints received and their resolution.

The Compliance Department shall prepare and submit the prescribed complaints reporting return to CySEC on a monthly basis, in accordance with the format, reporting instructions, and submission deadlines specified in the applicable CySEC Circulars and regulatory guidance in force from time to time.

The complaints reporting return shall be submitted electronically through the Transaction Reporting System ("TRS") and shall be digitally signed using the CySEC-approved digital certificate. The report shall be submitted within the deadline prescribed by CySEC following the end of each reporting period.

Where no complaints have been received during the reporting month, the Company shall nevertheless submit a nil return to CySEC, where such submission is required under the applicable reporting

framework.

Where information previously reported to CySEC is subsequently amended, updated, or a complaint previously reported is resolved after submission of the relevant return, the Company shall submit the necessary updated information in accordance with the applicable CySEC reporting instructions and procedures.

The Compliance Department shall maintain adequate records supporting all information submitted to CySEC and shall ensure that reported data is complete, accurate, and consistent with the Company's Complaints Register and underlying complaint files.

11. Record keeping

The Company shall maintain complete, accurate, and up-to-date records of all complaints received, together with all related correspondence, supporting documentation, investigation records, internal assessments, decisions, remedial actions, compensation payments, and communications with the complainant, CySEC, the Financial Ombudsman, or any other competent authority.

Complaint records shall be retained in a durable medium and maintained in a manner that enables their prompt retrieval, monitoring, review, and regulatory inspection.

All complaint-related records shall be retained for a minimum period of five years from the date of resolution of the complaint and, where required by applicable legislation, regulatory requirements, or upon request by CySEC or another competent authority, for a period of up to seven years.

The Compliance Department shall be responsible for ensuring the completeness, accuracy, confidentiality, and secure retention of complaint records in accordance with the Company's record-keeping procedures, applicable regulatory requirements, and data protection obligations.

12. Referral of Unresolved Complaints to the Financial Ombudsman of the Republic of Cyprus

If the complainant is not satisfied with the Company's final response, if the complaint has been rejected, or if the Company has not provided a final response within the applicable regulatory timeframe, the complainant may have the right to refer the matter to the Financial Ombudsman of the Republic of Cyprus for independent examination and dispute resolution.

The Financial Ombudsman is an independent body established under the provisions of Law 84(I)/2010 for the out-of-court resolution of disputes between consumers and financial institutions. Complaints may be submitted in either Greek or English using the prescribed complaint form, either electronically or in paper form. A fee determined by the Financial Ombudsman, currently €20, is payable upon submission of a complaint.

For the purposes of the Financial Ombudsman framework, a consumer may be either a natural person or a legal entity, subject to the eligibility criteria and conditions set out in the applicable legislation.

Where a complaint satisfies the submission and admissibility requirements prescribed by law, it will be examined by the Financial Ombudsman and a decision will be issued and communicated to both

the complainant and the financial institution.

Where the amount of monetary compensation awarded exceeds €20,000, the decision becomes binding only if both the complainant and the financial institution expressly accept its binding nature within two months of notification. Where the amount of compensation does not exceed €20,000, the decision is binding on both parties, subject to any rights of appeal or challenge available under applicable law.

Further information regarding eligibility criteria, complaint submission procedures, applicable fees, and the powers of the Financial Ombudsman can be found on the Financial Ombudsman's official website:

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

Email: complaints@financialombudsman.gov.cy

Tel: +357 22 848 900

Postal Address:

15 Kypranoros, 1st floor

1061 Nicosia

Cyprus

13. Submission of Unresolved Complaints to the Cyprus Securities and Exchange Commission

The Cyprus Securities and Exchange Commission (“CySEC”) is the competent supervisory authority responsible for overseeing the activities of Cyprus Investment Firms and ensuring compliance with the applicable regulatory framework.

CySEC does not act as a dispute resolution body and does not have the power to award compensation or otherwise resolve individual disputes between clients and regulated entities. Consequently, CySEC does not investigate individual complaints for the purpose of obtaining redress for complainants.

Nevertheless, complaints submitted to CySEC are taken into consideration in the exercise of its supervisory and regulatory functions and may contribute to the assessment of a regulated entity's compliance with its legal and regulatory obligations.

If a complainant wishes to inform CySEC of a matter relating to the Company or believes that the Company may have breached its regulatory obligations, the complainant may submit the relevant complaint directly to CySEC using the prescribed complaint form and procedure available on CySEC's official website.

Further information regarding the complaint submission process can be found at:

Website: <https://www.cysec.gov.cy/en-GB/complaints/how-to-complain/>

Complainants should note that submitting a complaint to CySEC does not affect or replace their right to seek redress through the Financial Ombudsman of the Republic of Cyprus, the courts, or any other dispute resolution mechanism available under applicable law.

14. Data Protection

The Company is committed to protecting the privacy and confidentiality of personal data and processes all personal information obtained in connection with the handling of complaints in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation – “GDPR”), the Processing of Personal Data (Protection of Individuals) Law of 2018 (Law 125(I)/2018), as amended, and any other applicable data protection legislation.

Personal data collected and processed in connection with a complaint may include, among other things, identification details, contact information, account and transaction data, correspondence, and any other information necessary for the investigation, assessment, and resolution of the complaint.

The Company processes such personal data for the purposes of receiving, investigating, managing, resolving, and reporting complaints, as well as complying with its legal and regulatory obligations. The legal basis for such processing is compliance with a legal obligation to which the Company is subject pursuant to Article 6(1)(c) of the GDPR and, where applicable, the legitimate interests of the Company in effectively administering and resolving complaints, improving its services, and protecting its legal rights pursuant to Article 6(1)(f) of the GDPR.

Access to complaint-related personal data is restricted to authorised personnel who require such access for the performance of their duties. The Company implements appropriate technical and organisational measures to safeguard personal data against unauthorised access, disclosure, alteration, loss, or destruction.

Subject to applicable legal and regulatory requirements, complainants have the right to request access to their personal data, rectification of inaccurate data, restriction of processing, erasure of personal data, data portability, and to object to certain processing activities. These rights may be subject to limitations where the Company is required to retain information to comply with legal, regulatory, or record-keeping obligations.

Personal data contained in complaint files shall be retained for as long as necessary to fulfil the purposes for which it was collected and to comply with the Company's legal and regulatory obligations. In accordance with applicable investment services legislation and record-keeping requirements, complaint records shall generally be retained for a minimum period of five years from the date of resolution of the complaint and, where required by applicable law, regulatory requirements, litigation holds, or upon request of a competent authority, for a period of up to seven years. Upon expiry of the applicable retention period, personal data shall be securely deleted, anonymised, or otherwise disposed of in accordance with the Company's data retention procedures.