

SIB (CYPRUS) LIMITED**License Number:** KEPEY 066/06**Reg. office:** 2-4 Arch Makarios III Ave, Capital Center, 9th Floor, P.O.Box 21255, CY-1505, Nicosia, Cyprus**Head office:** Alpha Business Center, 1st Floor, Block B, 27 Pindarou Street, CY-1060, Nicosia, Cyprus**Postal Address:** P.O. Box 20934, CY-1665, Nicosia, CyprusTel: +357 22 419 000 | Fax: +357 22 419 100

Customer Complaints Policy and Procedure

In fulfilling its obligations as an investment firm licensed by the Cyprus Securities and Exchange Commission ('CySEC') to provide investment services, SIB (Cyprus) Limited ("SIB") applies Article 26 of Commission Delegated Regulation (EU) 2017/565 of 25.04.16 as regards organisational requirements and operating conditions for investment firms.

SIB's complaints handling policy, as may be amended from time to time, is endorsed by its senior management and Risk and Compliance Committee.

When a complaint is filed by a client or potential client ("complainant"), SIB performs the following actions:

- Acknowledges receipt of the complaint;
- Communicates the unique reference number to the complainant;
- Informs the complainant that the unique reference number should be used in all future contact with SIB, the Financial Ombudsman and/or the CySEC regarding the specific complaint;
- Gathers and investigates all relevant evidence and information regarding the complaint;
- Provides a response, in plain language, in a timely manner as detailed below;
- Informs the complainant, in case of any delays in providing response, about the reason of such delay and indicates expected timeline for response;
- When providing a final decision that does not fully satisfy the complainant's demands, notifies in writing the complainant using a thorough explanation of its position on the complaint and setting out the complainant's option to maintain the complaint e.g. through the CySEC, the Financial Ombudsman, alternative dispute resolution mechanism or the relevant courts as detailed below;
- Records, in an internal archive as quickly as possible and in an appropriate manner, complaints received and measures taken to resolve them.

How to lodge a complaint?

Any client or potential client of SIB can lodge a complaint free of charge by submitting written query to his/her regular contact or to the Chief Compliance Officer, either by

Email: Compliance_Cyprus <Compliance_Cyprus@sib.com.cy>

or by mail:

SIB (Cyprus) Limited
Alpha Business Center
1st Floor, Block B
27 Pindarou Street
1060 Nicosia, Cyprus.

Any employee of SIB who receives a complaint verbally, should ask the complainant to put his/her complaint in writing (email is acceptable).

Complaints handling procedure

- Receipt of the complaint will be acknowledged in writing within a maximum of five working days. The acknowledgement will include the name and position of the person who will investigate the complaint. The acknowledgement will also include the unique reference number and a note that the unique reference number should be used in all future contact with SIB, the Financial Ombudsman and/or the CySEC regarding the specific complaint.
- When reviewing the complaint, the Chief Compliance Officer shall consider and check all facts referred to in the complaint. The Chief Compliance Officer shall further check if the employees involved were compliant with the internal rules and procedures of SIB when performing their functions in relation to the client. The Chief Compliance Officer may contact the client for clarifications.
- SIB employees assigned to investigate the complaint shall make every effort to respond to the complaint within two months of the receipt of the complaint. If no definitive solution to resolve the complaint has been possible within this period, a letter will be sent to the complainant before the expiry of the two months of the receipt of the complaint outlining why a resolution has not yet been possible.
- All complaints should be resolved within three months of the receipt of the complaint. However, if a resolution is impossible within this timeframe, a written communication will be sent to the complainant three months after the receipt of the formal complaint and including/setting out the procedure envisaged to be followed.
- Where the complaint has been resolved to the satisfaction of the client, every effort should take place to ensure that the acknowledgment of the client's satisfaction is recorded; where such acknowledgement takes the form of only a relevant verbal comment by the client, the employee handling the complaint is encouraged to record this in the complaint record and notify SIB's Compliance Department as appropriate.
- If the client is not satisfied with the response to his/her complaint, the Chief Compliance Officer will communicate with the client and try to find a solution to the dispute. If a solution is found, the Chief Compliance Officer shall prepare a letter to the client setting up the agreed terms of the solution. If no solution is found, the Chief Compliance Officer will inform the client of the ultimate position of the Company and other available options to maintain the complaint.

Options available to a complainant in case of dissatisfaction with the SIB's response to a complaint

Where a complainant is not satisfied with the response/solution provided by SIB, he/she can maintain the complaint e.g. through the CySEC, the Financial Ombudsman when operational, alternative dispute resolution mechanism or the relevant courts.

Recording of complaints

SIB keeps records of all complaints received and measures taken to resolve them, and retains those records for at least five years and in line with SIB's internal procedures and local legal requirements.