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## **Complaints Handling Procedure**

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## CONTENTS

INTRODUCTION .....	2
CLIENT COMPLAINTS .....	2
DEFINITION OF A COMPLAINT .....	2
COMPLAINT HANDLING PROCEDURE .....	2
COMPLAINTS REGISTER .....	3
FAQs 3 .....	3
AMENDMENTS .....	4
MONITOR AND REVIEW .....	3

## 01 INTRODUCTION

NBH Markets EU Ltd, is an investment firm that operates as a broker globally, where investment and ancillary services can be provided.

NBH Markets EU Limited (hereinafter referred to as the “Company”), is an investment firm that operates as a broker, where investment and ancillary services can be provided. NBH Markets EU Limited is incorporated in the Republic of Cyprus with Registration Number HE 291974. The Company is authorized and regulated by the Cyprus Securities and Exchange Commission (‘CySEC’), with license No. 208/13, and registered office located at 28th October, 377 SOBOH HOUSE, 3rd Floor Neapolis, 3107, Limassol, Cyprus.

The Customer acknowledges that the Company’s official language is English.

## 02 CLIENT COMPLAINTS

NBH Markets EU Ltd. (the Company) has elected to 'establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints or grievances received from retail clients or potential retail clients, and to keep a record of each complaint or grievance and the measures taken for the complaint’s resolution’.

## 03 DEFINITION OF A COMPLAINT

NBH Markets EU Ltd. declares a complaint as any grievance and/or objection and/or criticism against the Company concerning the activities of those persons under the control of the Company (the Employees), in connection with the provision by the Company of the investment and/or ancillary services it offers.

## 04 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.

If a client has any objection with respect to the provision of investment and ancillary services and/or the performance of investment activities, (s)he is encouraged to submit a complaint form.

The complaint form is attached as the *Appendix I*.

**Any Client’s complaints received will be forward, to the Compliance Officer;**

The complaints handling arrangements established by the Company should be known and easily accessible to Clients

The Company will endeavor to ensure all Communication is in plain language which is clearly understood.

The Company shall send a written acknowledgment to the client within forty-eight (48) hours (2 working days, as mentioned above) from the time the complaint is received, describing the procedure and who is responsible for handling it, confirming that the complaint has been received it will take all required actions to resolve the complaint, as well as the approximate time required to do so.

When the Compliance Officer receives the Complainant’s complaint then a written acknowledgement will be sent to the Complainant confirming to them:

- the Complaint Reference Number
- the name and job title of the person dealing with the complaint
- the Complaint Handling Process

The Company will then gather and investigate all relevant evidence and information regarding the complaint and provide an Initial response without any unnecessary delay and within 28 (twenty-eight) working days from the date that the Compliance Officer receives the complaint, including any offer of redress if applicable.

When an answer cannot be provided within the expected time limits, the Company will inform the complainant about the causes of the delay and indicate when the Company's investigation is likely to be completed.

Within 8 weeks, and no later than 4 months, from the date that we receive a complaint, the Company will endeavor to provide a final response, including any offer of redress if applicable, or a holding response will be sent to the complainant explaining the findings of the investigation.

In the case where a holding response is sent to the complainant, an explanation shall be given stating the reasons why the Company has not been able to resolve the complaint and indicate an estimated time to resolve the issue.

If after 6 months of receiving the complaint, the Company is still not able to resolve the issue, then the compliance officer will notify the complainant, stating the reasons.

## 05 COMPLAINTS REGISTER

The Company must register the complaints it receives as soon as possible, in an internal register with an appropriate manner, as well as for easy reference and retrieval. Also the Company must apply the following:

Upon receiving the complaint, the Company will register the complaint directly to an internal register, giving it a **unique reference number** which will be considered of ten digits.

The unique reference number is communicated to the complainant.

The Company stores all complaints it receives on an internal archive, as quickly as possible, and in an appropriate manner.

## 06 FAQs

Questions regarding this Procedure should be addressed, in the first instance, to the Customer Support Department.

## 07 AMENDMENTS

The Company analyses, on an on-going basis, complaints handling data, to ensure that they identify and address any recurring or systemic problems, and potential legal and operational risks, for example by:

- Analyzing the causes of individual complaints so as to identify root causes common to types of complaints,
- Considering whether such root causes also affect other processes or financial means, including those not directly complained of; and
- Correcting, where reasonable to do so, such root causes.

## 08 MONITOR AND REVIEW

NBH Markets EU Ltd. will monitor on a regular basis the effectiveness of this Policy. In addition, Company will review the Policy at least annually. A review will also be carried out whenever a material change occurs that affects the ability of the Company to continue to provide high quality services. The Company will notify its affected complainants on any changes in its Policy.



**APPENDIX I**

**CUSTOMER COMPLAINT FORM**

**A. Client Information:**

<b>Name:</b>	<b>Account Number:</b>
<b>Address:</b>	<b>Telephone Number:</b>
<b>Registered Email Address:</b>	<b>Mobile Number:</b>

**B. Brief Summary of the Complaint:**

<b>Name of Employee:</b>	<b>Department:</b>
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Please describe the product or service you are complaining about (description, evidence, amount and suggested way to be solved):

*Please enclose any other relevant documentation that may help us to handle the complaint.*

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\_\_\_\_\_  
Date and Place

\_\_\_\_\_  
Client Signature



**For internal use only:**

Complaint received by: \_\_\_\_\_

Date of reception: \_\_\_\_\_

Reference number: \_\_\_\_\_

Department involved: \_\_\_\_\_

Initial response to client: Yes No

Date: \_\_\_ / \_\_\_ / \_\_\_\_\_

Initial Action Taken:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Informed Client of Initial Action Taken: Yes No

Date: \_\_\_ / \_\_\_ / \_\_\_\_\_

Further Action Taken: Yes No

Date: \_\_\_ / \_\_\_ / \_\_\_\_\_

Further Action Taken:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

File handed on to General Manager: Yes No

Date: \_\_\_ / \_\_\_ / \_\_\_\_\_

Settlement of Complaint: Yes No

Date: \_\_\_ / \_\_\_ / \_\_\_\_\_

Summary of how the complaint was settled:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
Signature of Officer Responsible:

\_\_\_\_\_  
Date