



# Complaints Handling Policy

## 1. Complaint or grievance handling

The purpose of this Policy is to set out the procedure to be followed and the appropriate action required to be taken by CDG Global (EU) Ltd (the "Company") in the case of a complaint by any client to ensure the Company's compliance with the Investment Services and Activities and Regulated Market Law 87(I)2017.

### Definitions

"Complainant" means any person, natural or legal, which is eligible for lodging a complaint to the Company and who has already lodged a complaint.

"Complaint" means a statement of dissatisfaction addressed to the Company by a complainant relating to the provision of investment services.

The Company shall establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints or grievances received from retail or potential retail clients, and to keep a record of each complaint or grievance and the measures taken for the complaint's resolution.

In addition, the Company is required to:

- Apply a complaints management policy, which is defined and endorsed by the senior management and the board of directors, who will be responsible for its implementation and for monitoring the Company's compliance with it.
- Ensure that it has a complaints management function, which enables complaints to be investigated fairly and possible conflicts of interest to be identified and mitigated.

### 1.1 Policy

Clients' complaints or grievances are initially handled by the Customer Support/Back Office. However, the final settlement of non-trivial complaints or grievances needs to be approved by Senior Management.

A complainant shall complete the Complaint Form developed by the Company (available on Appendix 1 of this Policy). Once completed, it should be sent either in a hard copy along with a copy of the complainant's identification document and any additional documentation that would be relevant to the complaint to the Company's head offices which are situated at 109 Omonoias Ave., 2<sup>nd</sup> Floor, Office 201, 3045 Limassol, Cyprus or by e-mail to [compliance@cdgglobal.eu](mailto:compliance@cdgglobal.eu)

The procedure which shall be followed by the Company, when handling clients' complaints or grievances, is the following:

- a. A complaint or grievance is initially handled by a member of the Back Office/Customer Support Department. The employee receiving the complaint or grievance shall take the necessary actions so that the complaint or grievance is properly addressed.
- b. The complaint or grievance in the form that has been received immediately (within three working days), should be forwarded to the head of the department where the complaint is addressed.
- c. The member of the Back Office/Customer Support Department shall send, within five days, a written acknowledgement letter informing the complainant that the complaint or grievance is under investigation and has been forwarded to the relevant department/personnel, providing all details so that the complainant is aware who is dealing with his/her complaint or grievance. Along with the letter, the Company's Handling of Clients' Complaints Policy shall be provided to the complainant free of charge.

d. The member of staff, in addition to the above, should make all best efforts to ensure that in the case of the complaint or grievance being of such nature that can be resolved immediately, to do so that the client will not have to pursue the filling of a formal complaint. The member of staff in such a case shall not:

- i Commit him/herself in any way to the client.
- ii Address any issues in relation to best execution.
- iii Address any issues relating to legal issues.
- iv Commit the Company in taking any action prior to examining the issues in a formal manner.

The Company should investigate the complaint and reply, within two months, to the complainant about the outcome and decisions. During the investigation of the complaint, the Company should inform the complainant about the handling process. In the event that the Company is unable to reply within two months, the complainant should be informed about the reasons of this delay and be indicated the period of time that the investigation will be completed. In any event, that period should not exceed three months from the period of submission of the complaint.

### 1.2 Procedure to be followed when a formal complaint or grievance is received:

- a. When a written complaint or grievance is received, this shall be forwarded to the relevant department which is the most appropriate for dealing with the complaint.
- b. The member of the Back Office/Customer Support Department shall contact the client to inform him/her that the complaint or grievance has been received and it is under investigation.
- c. Upon receiving a written complaint or grievance, the following details should be obtained and recorded:
  - The identification particulars of any client having made a complaint or grievance.
  - The service provided by the Company and related to the complaint or grievance.
  - The employee responsible for the provision of those services.
  - The department where the employee belongs.
  - Date of receipt and registration of complaint or grievance.
  - Content of the complaint or grievance.
  - The capital and the value of the financial instruments which belong to the client.
  - The magnitude of the damage claimed by the client.
  - Reference of any correspondent exchanged between the Company and the client.
- d. The events leading to the complaint or grievance should be examined and assessed based on the information provided by the client.
- e. The facts as stated by the client have been examined and verified whether any additional information, need to be retrieved from the Company's archive (electronic mail, recorded telephone calls, IT data, etc.).

f. All non-trivial complaints or grievances shall be brought to the attention of and their resolution should be approved by the Senior Management.

g. Upon completion, of the investigation a report shall be prepared stating the facts and brought to management's attention, which will decide on the formal response to the client and the action to be taken.

h. Upon investigation completion, the member of the Back Office/Account Opening Department shall inform the complainant in writing, using a plain language which is clearly understood, about results of the investigation and actions taken to satisfy the complainant's demand(s) without any unnecessary delay.

If the provided investigation results do not fully satisfy the complainant's demands, the Company should provide to the complainant in writing a thorough explanation of its position on the complaint and set out the complainant's option to maintain the complaint e.g. through CySEC, the Financial Ombudsman, ADR Mechanism, or the relevant Courts.

In the case where a client complaint or grievance is valid, the management shall take such necessary action together with the Head of Department(s) to which the complaint or grievance is related in order to identify and verify:

- a. Reasons for failure of procedure followed.
- b. Weaknesses of the internal controls.
- c. Implementation of internal controls that would prevent any complaint or grievance in the future.

j. In the event that the issue has not been resolved within five (5) working days, or if the remedy measure involves actions by other departments, then the Head of the Administration/Back Office Department shall communicate the Client complaint or grievance to the General Manager. At the same time the Client shall be informed from the Head of the Administration/Back Office Department that an initial answer/response to the complaint at hand should be expected four (4) weeks since the receipt of the complaint and that the Company will ensure that the complaint is resolved within eight (8) weeks from its receipt. The Company's notification to the complainant should also include the reasons of the delay. In the event that the Company is unable to respond within two months to the Client's complaint, it informs the complainant of the reasons for the delay and indicates the period of time within which it is possible to complete the investigation. This time period cannot exceed three months from the submission of the complaint by the Client.

All suggested procedures shall be approved by Senior Management at the meeting following the completion of the investigation.

The abovementioned procedure shall be disclosed in summarised form to the complainant through the agreement which is signed for the provision of investment services.

### 1.3 Complaints on an on-going basis

The Company undertakes to analyse, 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:

- Analysing 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.

### 1.4 Reporting of complaints

Information regarding the complaints received by the Company shall be disclosed to CySEC through the submission of Document T144-002-01. The said Document is submitted in an electronic form to CySEC on a monthly basis.

Further to the provisions of Circular C198, the Company must submit the Document T144-002-01, even if no complaints have been received during the reporting month or no update with regards to the existing complaints is applicable.

### 1.5 Record-keeping of complaints or grievances received

The responsible department for the record keeping of complaints or grievances received is the Back Office / Account Opening Department. In particular, the Head of Back Office, or his designee, will keep a record of each complaint and the measures taken for the complaint's resolution.

The complaint shall be registered once it is receiving on an internal archive and in an appropriate manner. The Head of Back Office, or his designee, shall maintain a central record of all complaints that includes the following information:

- name, address and account number (if available) of the complainant;
- date on which the complaint was received;
- department(s) involved the complaint investigation along with the names of the responsible employees;
- description of the nature of the complaint;
- disposition of the complaint.

The Company shall maintain all complaints or grievances for a minimum period of five years.

### 1.6 Accountability to CySEC

The Company is required to provide to the Commission information regarding the complaints it receives via Document T144-002-01. The said Document is submitted in an electronic form to the Commission on a monthly basis.

Further to the provisions of Circular C 100 and C198, the Company must submit the Document T144-002-01, even if no complaints have been received during the reporting month or no update with regards to the existing complaints is applicable.

## COMPLAINT FORM

Please complete the fields below and submit your completed form, together with any relevant supporting documentation, to [compliance@cdgglobal.eu](mailto:compliance@cdgglobal.eu). Alternatively, you may submit your complaint via post/courier to *CDG Global (EU) Ltd, 109 Omonoias Ave, 2<sup>nd</sup> Floor, Office 201, 3045 Limassol, Cyprus.*

Client's Name: \_\_\_\_\_

CDG Global Account : \_\_\_\_\_

Client's Address: \_\_\_\_\_

Client's Email: \_\_\_\_\_

Complaint Description: \_\_\_\_\_

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

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

Client's Signature: \_\_\_\_\_

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### Internal Use Only

Employee handling the complaint: \_\_\_\_\_

Position: \_\_\_\_\_

Date of Receipt: \_\_\_\_\_

Date of response: \_\_\_\_\_

Result and Date of final resolution: \_\_\_\_\_

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