

CLIENTS' COMPLAINTS HANDLING POLICY

SEPTEMBER 2019

COMPLIANCE DEPARTMENT

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1. Introduction

In accordance with the Markets in Financial Instruments Directive 2014/65/EU and the Law 87(I) / 2017 (hereinafter referred to as “MiFID II”), GPB Financial Services Limited (“GPBFS” or “the Company”) is required to establish, implement and maintain an effective and transparent complaints handling policy and procedures for the prompt handling of Clients' or potential Clients' complaints.

In this respect, the Company has established this Complaints Handling Policy (“the Policy”) as well as a robust framework comprising of, amongst others, procedures, processes, controls and monitoring processes, to ensure the prompt handling of Clients' or potential Clients' complaints. This Policy describes, amongst others, the process that Clients will need to follow in order to submit a Complaint to the Company.

This Policy constitutes part of the overall compliance framework of GPBFS and should be read in conjunction with the following:

- “Conflicts of Interests Policy”;
- “Document Retention Policy”;
- “Procedures Manual”.

In cases where there are references in any of the internal policies and procedures of the Company in relation to issues covered by this Policy, which were approved prior to the approval of this Policy, the provisions of this Policy will prevail.

2. Terms and definitions

2.1 Terms

BoD	<i>Board of Directors</i>
CD	<i>Compliance Department</i>
CySEC	<i>Cyprus Securities and Exchange Commission</i>
ESMA	<i>European Securities and Markets Authority</i>
EU	<i>European Union / Union</i>
GM	<i>General Manager</i>
MiFID II	<i>Markets in Financial Instruments Directive 2014/65/EU and Law 87(I)/2017 regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets of 2017</i>
MTF	<i>Multilateral Trading Facility</i>
OTF	<i>Organised Trading Facility</i>

2.2 Definitions

Ancillary services - means any of the ancillary services and activities for which the Company is licensed to provide, as defined in definition of “Relevant Activities”.

Board of Directors (“BoD”) - means the Executive Directors and Non-Executive Directors.

Client - means any natural or legal person to whom GPBFS provides Relevant Activities.

Competent authority - means the Cyprus Securities and Exchange Commission (“CySEC”).

Complainant - means any person, natural or legal, which is eligible for submitting a Complaint to GPBFS and has submitted a Complaint.

Complaint - means a statement of dissatisfaction addressed to the Company by a Complainant relating to the provision of Relevant Activities.

Dealing on Own Account - means trading against proprietary capital resulting in the conclusion of transactions in one or more Financial Instrument.

Execution of orders on behalf of Clients - means acting to conclude agreements to buy or sell one or more financial instruments on behalf of clients and includes the conclusion of agreements to sell Financial Instruments issued by an investment firm or a credit institution at the moment of their issuance.

Financial Instrument - means those instruments specified in Section C of Annex I of MiFID II.

Investment services / investment activities - means any of the ancillary services and activities for which the Company is licensed to provide, as defined in definition of "Relevant Activities".

Relevant Activities - means, for the purpose of this Policy, the following activities provided to Clients:

Investment Services

- Reception and transmission of orders in relation to one or more Financial Instruments;
- Execution of orders on behalf of Clients;
- Dealing on own account;
- Underwriting of Financial Instruments and / or placing of Financial Instruments on a firm commitment basis; and
- Placing of financial instruments without a firm commitment basis.

Ancillary Services

- Safekeeping and administration of financial instruments for the account of Clients including custodianship and related services;
- Granting credits or loans to an investor to allow him to carry out a transaction in one or more financial instruments, where the firm granting the credit or loan is involved in the transaction;
- Advice to undertakings on capital structure, industrial strategy and related matters and advice and services relating to mergers and the purchase of undertakings;
- Foreign exchange services where these are connected to the provision of investment services; and
- Services relating to underwriting.

TRS – means the Transaction Reporting System of CySEC.

3. General principles

3.1 Scope

The aim of this Policy is to minimize instances of Clients' Complaints and grievances through proper service delivery as well as to establish a comprehensive framework in order for the employees of the Company to understand their responsibilities relating to the handling of Clients' Complaints as provided within this document.

In particular, this Policy sets out the scope of the regulatory requirement relating to the handling of Clients' Complaints relevant to the Company's services and products in order to ensure an adequate treatment of Clients' Complaints and that all necessary steps are taken for the handling of Clients' Complaints.

This Policy determines the following:

- the channels for Complaints receiving;
- the process of recording the Complaints received;
- the relevant analysis of Clients Complaints which should be undertaken;
- the decision making process in relation to the Clients;
- the process of informing the Complainant of the analysis performed in relation to a Compliant;
- the record-keeping and reporting of Complaints to General Manager ("GM");
- the reporting / submission process of required information to CySEC.

Overall, this Policy provides guidance to the Company and its employees, as well as the Company's clients on how the Company receives and manages Clients' Complaints.

This Policy is not intended to cover all eventualities and all circumstances that may be relevant to a particular Client's Complaint that has been communicated to GPBFS.

Where a specific circumstance is not captured in this document, employees should seek further input from the Compliance Department.

3.2 *Applicability*

All concerned employees shall at all times conduct themselves in a professional and ethical manner, be very cautious and should strictly follow the provisions of the present Policy when they are involved in the Company's Client Complaints handling process. The Policy as well as any subsequent amendments are binding and distributed to all employees.

3.3 *Policy Statement - key principles for Complaints handling*

The Company is committed to handling Complaints according to the following key principles:

- **Free of charge:** the handling of Complaints is free of charge.
- **Speed and compliance with handling timeframe:** the Company will acknowledge receipt of a Client's Complaint within **five business days** of such receipt by the Compliance department.

Furthermore, the Company will keep Clients informed of any specific circumstances that may prevent the Company from answering Clients within the timeframe mentioned above.

- **Transparency:** GPBFS will communicate all information on the handling process upon Client's / Competent Authority's request.

Clients are fully informed of the methods to escalate their Complaints / grievances within the Company and their rights to alternative remedy, if they are not fully satisfied with the Company's response.

- **Independence:** Clients' or potential clients' Complaints should be handled effectively and in an independent manner.
- **Efficiency and Impartiality:** GPBFS has established and implemented all necessary arrangements / mechanisms / controls in order to ensure that Clients' Complaints are efficiently handled and each one is answered with a reasoned response.

Employees always work in good faith and without prejudice to the interests of the Client.

3.4 Regulatory Framework

The Policy has been prepared in accordance with the following laws, regulations, directives and guidelines:

- Law 87(I)/2017 regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets of 2017;
- Directive 2014/65/EU of the European Parliament and of the Council, of 15 May 2014 on Markets in Financial Instruments;
- Commission Delegated Regulation (EU) No. 2017/565 of 25 April 2016, supplementing Directive 2014/65/EU of the European Parliament and of the Council; and
- Other laws, directives and circulars issued by ESMA and CySEC from time to time, applicable to this Policy.

4. Roles and Responsibilities

4.1 The Board of Directors

The Company's Board of Directors ("BoD") is responsible for the approval of this "Complaints Handling Policy" and any subsequent amendments / revisions.

In addition, the BoD has the responsibility, amongst others, to ensure:

- that the Policy is effectively communicated to all directors and employees of the Company;
- compliance with the provisions stipulated in the Policy;
- the timely and effective training and education of the concerned employees; and
- that disciplinary measures are taken and enforced when rules are not followed by employees.

4.2 Responsibilities of the Compliance Officer

The Compliance Officer has the responsibility to:

- ensure that the provisions stipulated in this Policy are followed at all times;
- periodically evaluate the effectiveness of the Policy and adopt any alternative or additional measures where necessary and appropriate;
- maintain and periodically review the list of Client's Complaints and ensure that feedback is provided to Clients in a timely manner, in line with the provisions of this Policy;
- analyse Complaints and Complaints-handling data to ensure that any risks or issues are timely identified and addressed;
- monitor the operational effectiveness of the Complaints-handling process on an ongoing basis and consider Complaints as a source of relevant information in the context of the Company's general monitoring responsibilities;
- report to the Company's BoD, on at least an annual basis, on the Complaints-handling reporting as well as remedies undertaken or to be undertaken;
- provide advice in relation to the implementation of this Policy;
- make available the above information to the relevant Competent Authority, if requested.

4.3 Responsibilities of Internal Audit Function

The Internal Audit function has the responsibility to perform an audit, at least on an annual basis, in order to assess the compliance level of the employees / departments, as well as the Company as a whole, in connection with the provisions stipulated in this Policy.

5. Identification of a Client Complaint

Definition of Complaint

A Complaint is defined as any expression of dissatisfaction, whether made orally or in writing, whether justified or not, and regardless of whether it appears to be a serious matter, from or on behalf of a Complainant, about the Company's provision or failure to provide a financial service.

It is noted that requests for information, opinions, clarification, services or benefits are not considered Complaints.

Source of Complaint

A Complaint arises due to:

- the biased aspects when dealing with Clients; or
- inadequacy of the functions / arrangements made available to the Clients or gaps in the quality of service expected and /or actual services rendered.

Examples of Complaints may include, amongst others, the following:

- Complaint about the level of service provided to the Client;
- Dispute about instructions or the execution of Client orders;
- Complaint about excessive or incorrect charges;

- Allegations of bad faith, malpractice or impropriety; or
- Other matters.

6. Complaints Handling

The aim and commitment of GPBFS is to provide the best possible service to its Clients or potential Clients. In this respect, and in order to ensure the reasonable and prompt handling of Complaints received from Clients and / or potential Clients, the following principles have been adopted.

6.1 Complaints Registration Channels

A Complaint is submitted to GPBFS in writing only via the completion of the “*Client Complaint Form*”, enclosed in **Annex I** of this document. Clients and / or potential Clients may submit Complaints free of charge.

The Client shall complete the “*Client Complaint Form*” and send a scanned copy to the Company through the following dedicated Complaint Registration Channels:

- **By E-mail:** mchrysostomou@gpbfs.com.cy
- **By Post:** GPB-Financial Services Ltd
Crystalserve Business Center, 65 Spyrou Kyprianou, 2nd Floor
Mesa Geitonia, 4003 Limassol, Cyprus
- **By Fax:** +357 25055101

6.2 Registration of Clients Complaints

Complaints received from Clients or potential Clients are registered in the Company’s internal Complaints Register, which is managed and controlled by the Compliance Officer. A unique registration number is assigned to each Complaint and is attached to the record of the Client’s Complaint in the Complaints Register.

If multiple Clients report the same Complaint, each Complaint should be recorded separately in the Complaints Register.

The Compliance Officer shall ensure that the following information is provided by the Complainant:

- the name of the Complainant who wishes to make the Complaint and or claim;
- the Complainant contact details (address, contact phone numbers);
- the date of the Complaint and or claim;
- the date(s) of the incident(s);
- the details of the Complaint(s) and or claim(s) – A full description of the events.

Further to the above, upon receiving the Complaint, the Compliance Officer will register the Complaint directly to the internal register, giving it a unique reference number.

The unique reference number must consist of ten digits:

- the first two digits are the code of the Company regarding the Transaction Reporting System – TRS;
- the following four digits define the year;
- the last four digits denote the number of each Complaint serial number e.g. for 2018 – AA20180001, AA20180002.

The unique reference number is communicated to the Complainant. The Company informs the Complainant that he /she should use the said reference number in all future contact with GPBFS, the Financial Ombudsman and / or CySEC regarding the specific Complaint.

The registration of each Complaint received must be performed no later than one (1) business day following the date of receipt. Access to the Complaints Register should be restricted to authorised employees only. Except to the extent necessary, the Complainant's identity or personal details should not be disclosed to other employees.

In case where a Complaint relates to an allegation of fraud, an accusation of gross negligence or serious administrative errors that may affect a significant number of Clients, the Company's General Manager must be also notified.

6.3 Acknowledge of Clients Complaints

All complaints need to be acknowledged within **five (5) business days** of receipt of a Complaint.

Such acknowledgement shall be provided to the Complainant in writing, and specifically via email, along with the unique reference number assigned to his / her Complaint. The Compliance Officer shall also inform the Complainant, in plain language that is easy to understand, of the possible time frame of any investigation and resolution of the submitted Complaint, in line with the provisions set out in this Policy.

The acknowledgement should include information regarding GPBFS's Complaints handling process, such as:

- a) Information of how to the Company will deal with the Complaint;
- b) The process that will be followed (e.g. acknowledgement of the Complaint and period of assessment, information regarding the Financial Ombudsman, Alternative Dispute Resolution mechanism);
- c) The name and position of the person responsible for the assessment of the Complaint; and
- d) The Complaint's unique reference number to be used in all future contact.

6.4 Assessment and assigning priority of Clients Complaints

The assessment of all Complaints received by the Company should be performed by the Compliance Officer.

In particular, a thorough root-cause analysis shall be performed and assistance shall be sought from all relevant departments. All aspects of the Complaint must be investigated irrespective of whether they will be upheld or not. Copies of any documents that support the assessment of a particular Complaint shall be retained and stored in the Client's folder.

The subject of a Complaint may be apparent from the information a Complainant provides, whereas other Complaints may require a lengthy investigation to clarify disputed factual or legal matters. Complaints may relate to one of the following topics:

- an investment and / or ancillary service or transaction;
- the failure of a Company's process (the Company did not follow its own instructions or procedures);
- Other matters related to dealings with the Company.

The analysis of each Complaint performed by the Compliance Officer shall take into account all risks that may arise during the provision of Relevant Activities by the Company. Depending on their seriousness / impact, Complaints are classified according to the expected level of damage for the Company as follows:

- **Serious Complaint** - a Client or potential Client Complaint that could cause significant damage to the Company's business or reputation. Examples of such Complaints may include Complaints with Legal or regulatory authority impact, Complaints related to fraud, Complaints related to personal data, e.t.c.
- **Regular Complaint** - a Client or potential Client Complaint that must be addressed but does not have the same potential for damage to the Company as a Serious Complaint.

Senior Complaints are considered to have highest priority and examined with maximum possible attention and urgency. Regular Complaints may be resolved by means of an explanation or an apology, or even financial compensation.

6.5 Decision making on Clients Complaints

Once the Compliance Officer receives a Complaint and following its preliminary assessment and prioritisation, the Compliance Officer shall liaise, if deemed necessary, with the relevant department for further clarifications.

In case of Serious Complaints, such Complaints shall be escalated to the Company's General Manager for further consultation.

6.6 Responding to the Complainant – Timeframes

The Company shall investigate the Complaint and reply, within **two (2) months**, to the Complainant about the outcome / decision. It is provided that, during the investigation of the Complaint, the Company shall inform the Complainant of the handling process of his / her Complaint.

The Complaint handling assessment process will not exceed the period of **two (2) months** from the receipt of the Client's Complaint by the Compliance department, except if specific circumstances make it impossible to comply with this timeframe.

In such cases, the Company will inform the Complainant of the reasons for the delay and will indicate the period within it is possible to complete the investigation. This period cannot **exceed three (3) months** from the submission of the Complaint.

6.7 Closing and documenting the Complaint

The Company will consider a Complaint to be closed when a final response has been sent to the Complainant or if at any point the Complainant informs the Company in writing that he / she considers the matter to be closed.

The date of closure of the Complaint must be recorded in the Complaint Register, where all information / supporting evidence will be filed in the Client's folder.

Following the closure of a Complaint, the Client's response regarding his / her satisfaction with the resolution, if applicable, shall be documented by completing the "Record of Complaints" form, as presented in **Annex II "Record of Complaints"** of this document.

Access to the "Record of Complaints" form is restricted to authorized staff. Except to the extent necessary, the Complainant's identity or personal details shall not be disclosed to other staff.

Once a Complaint has been registered in the "Record of Complaints" form, a written letter is sent to the Client, reiterating the Complaint process followed and the respective timeframe. This process must be performed for all Complaints, irrespective of whether the Complaint has been resolved.

6.8 Client's dissatisfaction – alternative solutions

In case where the Complainant is not satisfied with the Company's response, then the Company shall inform the Complainant about subsequent actions that could be taken. In particular, the Complainant can escalate the Complaint to the Financial Ombudsman or CySEC or the Alternative Dispute Resolution or the relevant courts.

The Financial Ombudsman

The Financial Ombudsman is an independent service for settling disputes between the financial firms and their Clients. Further helpful information can be obtained from visiting the Financial Ombudsman web site, at <http://www.financialombudsman.gov.cy>.

If the Client or potential Client wishes to escalate his / her Complaint, the Complaint can be submitted to the Financial Ombudsman at: complaints@financialombudsman.gov.cy with all relevant information / documentation and supporting evidence. In such cases, the Compliance Officer shall cooperate fully and comply promptly with any settlements or awards made by the Financial Ombudsman.

Cyprus Securities and Exchange Commission

A Complainant can also contact the Cyprus Securities and Exchange Commission. However, CySEC does not have restitution powers and therefore does not investigate individual Complaints.

Contact details of CySEC: website: <http://www.cysec.gov.cy> or email: info@cysec.gov.cy.

7. Reporting Requirements

7.1 Reporting of Complaints to General Manager (GM)

The Compliance Officer has the responsibility to submit on a monthly basis to the General Manager a report regarding the Complaints received by the Company, describing the handling process followed for each Complaint, the decision taken as well as the status of each Complaint.

7.2 Regulatory Reporting of Clients Complaints

Pursuant to the provisions stipulated on CySEC Circular C338 “Guidelines on complaints-handling for the securities sector – Handling of client’s complaints by CIFs” (the “Circular”), the Company is obliged to report to CySEC, by the fifth of each month for the previous month, all Complaints received from Clients or potential Clients.

In particular, the Company should complete and submit to CySEC via TRS the “CIF Reporting of Client’s Complaint” report (the “Report”).

A summary of the additional information required by the CySEC Circular is provided below:

- *A relevant field where each CIF shall report **whether it has received** Complaints from clients during the reporting period. CIFs that did not receive Complaints during the reporting period, shall select “No” in the field “Record Type” and shall submit the Form without completing any further information. In the event where the CIF has resolved and/or revised a complaint which was referred to CySEC in a previous submission of the Form, the CIF must complete all the fields of the Form and select the ‘U’ from the column “Record Type”, for the submission of an updated complaint which was submitted in previous period.*
- *A relevant field where each CIF shall report the **number of its clients** (who during the last six months have entered into at least one transaction) at the end of the reporting period.*
- ***The Complaints cause**, by selecting the appropriate cause of complaint from the list of causes provided by the Form. In case where the ‘other’ option is selected, this should only be used after ensuring that the Complaint Cause does not fall under any of the other categories provided by the Form. If this option is used then a short and detailed description is expected in the ‘Complaint Cause Comments’ field.*
- *Column in which the **date that the incident took place** shall be registered, regarding the Complaint of the client.*
- *Column in which the **amount that was paid to the investor** shall be registered, in case the Complaint was resolved (settlement amount).*

8. Record keeping requirement

The Company shall keep records of each Complaint and the measures taken for the Complaint’s resolution for a period of five (5) years, or seven (7) years if the CySEC requests so, in a secure and easily accessible medium, in line with the Company’s **Document Retention Policy**.

This obligation applies irrespective of whether the complaint involves an allegation of financial loss or material distress or inconvenience, and irrespective of whether they are resolved.

9. Monitoring of Complaints

The Company must analyse on an on-going basis the Complaints-handling related data in order to identify common issues arising from various types of Complaints, to identify systemic deficiencies as well as to understand whether such root causes affect other processes or financial means so as to initiate appropriate actions to make the Complaints redressal mechanisms more efficient and effective.

10. Training

The Company acknowledges its responsibility to establish, implement and maintain an effective written Complaints Handling Policy. In this respect, the Company provides and expects all employees to attend or take regular training on Complaints Handling related requirements, so as to ensure that employees understand those requirements and the restrictions imposed by the provisions of this Policy.

11. Creation / Periodic Review / Update of Complaints Handling Policy

The Company acknowledges its responsibility to establish, implement and maintain an effective written Complaints Handling Policy.

This Policy is created, owned and maintained by the Compliance Officer, which is responsible for maintaining version series, original requests, and supporting documentation with all approvals of this Policy.

The Company's Policy is assessed and periodically reviewed, at least on an annual basis, or more frequently, should the need arise. The following circumstances can trigger the review process on a more frequent basis:

- Change in the service and product mix of the Company;
- Identification of situations that are not adequately captured in the Complaints Handling Policy; or
- The applicable legislation requires the update of the Policy.

The Compliance Officer will use all reasonable endeavours to ensure that the Policy remains up-to-date and appropriate to the structure and size of the Company as well as the nature, scale and complexity of the Company's activities.

Any amendments to this Policy shall be approved by the Company's Board of Directors.

12. Policy Violations

Where an allegation is made to the effect that an employee has violated this Policy, whether or not this is intentional, the matter shall be dealt with under the Company's internal Code of Conduct. Where, after an internal investigation and subsequent disciplinary hearing, the allegation is upheld, the employee will be subject to a disciplinary action / penalties, which can include termination of employment.

Remedial and / or disciplinary action (where applicable) against employees and members of management and third parties may also include reimbursement or litigation, depending on the severity of the incident.

13. List of Annexes

Annex I *Client Complaint Form*

Annex II *Record of Complaints*

Annex I - Client Complaint Form**1. Client Information**

Natural Person name: _____
(if applicable)

Legal Entity Name: _____
(if applicable)

Address: _____

Phone Number: _____ Fax Number: _____

Email Address: _____

2. Account Information / Agreement type

Account Number / Agreement Number: _____

3. Does your Complaint involve a particular investment / financial instrument? Please state the date of the event, which gave raise to this Complaint.

If yes, please provide the name of the Financial Instrument and applicable date below:

Name of Financial Instrument: _____

Operation: _____

Event Date: _____

4. Does your Complaint involve a particular employee of the Company?

Name of Employee (if applicable): _____

5. Did you suffer any financial loss? Yes No

If yes, please provide details: _____

Amount: _____

6. Your Cooperation

Will you be available to speak to the General Manager? Yes No

Will you provide additional documentation? Yes No

7. Complaint Summary

Legal Entity / Natural Person Name: _____

Signature: _____

Date: _____

Please sign and return this letter either:

- **By E-mail:** mchrysostomou@gpbfs.com.cy
- **By Post:** GPB-Financial Services Ltd
Crystalserve Business Center, 65 Spyrou Kyprianou, 2nd Floor
Mesa Geitonia, 4003 Limassol, Cyprus
- **By Fax:** +357 25055101

For internal use by the Compliance Officer

Date Complaint received _____

Signature _____

Date of Management Notification _____

Annex II - Record of Complaints

Record of Complaints

Client	Name: _____ Address: _____ Email address: _____ Phone: _____ Country: _____
	LEI (where available) : _____ CIF : _____
	Account number (where applicable) : _____ Complaint Unique Reference Number: _____
Client classification (if applicable)	<input type="checkbox"/> Professional Client <input type="checkbox"/> Eligible Counterparty
Details of Complaint (include all individuals named in the Complaint)	

Facts (please provide details)		
Negotiation process (please provide details)		
Special Considerations for the Complaint (e.g. request to withheld client's identity, sensitive / confidential information)		
Conclusion & advises for future reference		
Department in Charge		
Type of service the Complaint relates to		
Category	1. Lack of knowledge;	2. Operational mishandling;
	3. Delay in processing;	4. Insufficient explanation;
	5. Waiting time;	6. Inadequate wording;
	7. Attitude of client reception;	8. Other inadequate client treatment;
	9. Requests, demands;	10. Allegations;
	11. Coercion;	12. Misunderstanding of client;

	13. Information Leakage;	14. Execution of orders (e.g. delay in execution, re-quotes, slippage, erroneous trades, etc);
	15. Quality or lack of information provided to the client;	16. Terms of contract/fees/charges;
	17. General admin/customer services (including custody/safekeeping services);	18. Unauthorised business being offered or carried out;
	19. Issue in relation to withdrawal of investor's funds;	20. Other.
Financial Instrument concerned (e.g. ISIN)		
Remedy the Complainant is seeking		
Dates	Date the Complaint was received: _____ Date the incident took place: _____ Date of "Complaint Receipt" sent to the Client: _____ Date of initial response to Complainant: _____ Date Complaint resolved: _____	
Disputed amount (if applicable)		

Settlement amount (if applicable)	
Report to General Manager	<input type="checkbox"/> Required (to Attn.: _____ date: _____) <input type="checkbox"/> Not required
Further Comments in relation to the investigation	Further information to be acquired: _____
Escalation of the Complaint :	Client referred to the Financial Ombudsman: Date: _____ / not applicable Client took the matter to court: (Attn. of: _____ Date: _____ / not applicable) Comments (if any): _____