

**7Q Financial Services Ltd**

---

**Client Complaint Handling Policy**

**Headquarters**

**Nicosia**

Kennedy Business Centre | Suite 402

12 -14 Kennedy Avenue

1087 Nicosia | Cyprus

T: +357 22763344

F: +357 22763355

[www.7qfs.com](http://www.7qfs.com)



September 2017

This document records the Client Complaint Handling Policy of 7Q Financial Services Ltd (hereinafter called “the Company”).

The Client Complaint Handling Policy of 7Q Financial Services Ltd, is in accordance with the demands of the Paragraph 13 of the Directive DI44-2007-01 which requires Cyprus Investment Firms 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.

In applying high ethical standards, 7Q Financial Services Ltd, when providing investment and/or ancillary services to Clients, acts honestly, fairly and professionally in the Clients’ best interests and fully complies with the provisions for the protection of the investors, envisaged by national law and European Union Markets for Institutions (MiFID) Directives.

For this reason, 7Q Financial Services Ltd has appointed a Compliance Officer, possessing the requisite independence by not being involved in any of the activities that created the complaint, in order to be able to handle any complaints from the Clients and also to resolve and apply mandatory measures and controls in order to avoid such recurring issues. The Compliance Officer is also responsible to communicate this company’s policy to all employees, officers, and director of the Company through adequate internal channels of communication.

### Definition

A complaint shall be deemed to mean any statement of dissatisfaction of a Client or any person acting on behalf of a Client alleging a grievance involving the conduct, business or affairs of the Company or any employee, officer or director of the Company.

### Procedure

It is the policy of the Company to:

- (a) Handle complaints from Clients or prospects in a timely, effective, fair and consistent manner.
- (b) To record complaints centrally in the complaints log.
- (c) To report complaints to the respective manager of the affected business/operations unit and also to the Board of Directors in cases where the Client is demanding compensation and/or the investigation has revealed serious omissions or malevolent behaviour on the part of the Company employees.

A complaint should include the following elements:

- The details of the complaint - full description, including the service to which the complaint refers to, the details of the employee that undertook to provide the service to the Client, dates, figures, amounts, etc.,
- Potential damages or damages suffered by the Client,
- Request of corrective measures.

When the Company receives a complaint, an acknowledgment letter must be sent to the Client within 5 business days. This letter must include the following elements:

- Unique Reference Number,
- Name of the person responsible for handling the Client’s complaint,
- Key elements of the Company’s Complaint Policy,
- Expected timeframe to adequately investigate and provide a detailed and thorough response, and where necessary a resolution; and
- Expected delay of the outcome.

This Unique Reference Number can be used in the future for any communication that the Client may have with the Company, the Financial Commissioner 'Financial Ombudsman' and/or the Cyprus Security and Exchange Commission, regarding the specific complaint.

The Compliance Officer will proceed to investigate the complaint and will prepare a report to be submitted to the Company's Board of Directors for decision. He may also contact the Client to request further information and/or clarifications.

7Q Financial Services Ltd within two (2) months from the receipt of the complaint is obliged to inform the client in writing of the outcome/decision. If this is not possible within the two (2) months period, the Company will inform the Client about the reasons for the delay stating the period within which the investigation is likely to be completed, which may not exceed the three (3) months after the submission of the complaint.

All complaints must be logged in the Complaint Log. The Complaint Log must, at least, include the following information:

- Date of complaint;
- Complainant's name;
- Nature of the complaint and the circumstances;
- Name of the person who is the subject of the complaint;
- The product or the services which are subject of the complaint; and
- The date and conclusions of the decision rendered in connection with the complaint.

Complaints in the Complaint Log must be maintained for a period of 7 years, following the resolution date.

The Compliance Officer who has the responsibility to ensure that all complaints are handled according to the policy, must monitor the complaint log and ensure that appropriate disciplinary measures are taken if necessary and provide recommendations for change in the Company's procedures if appropriate.

Where a Complainant is not satisfied with the response/solution provided by 7Q Financial Services Ltd, the Client holds the right at any time, to refer their complaint to the Cyprus Securities and Exchange Commission, the Financial Ombudsman, the alternative dispute resolution (ADR) mechanism or the relevant courts.

The Client can submit a complaint, using the following, communications channels:

By letter:

Kennedy Business Center,  
12 -14 Kennedy Avenue, Suite 402,  
1087 Nicosia, Cyprus.  
P.O. Box 20663  
1662 Nicosia, Cyprus.

By email:

compliance@7qfs.com

By telephone:

t: +357 22763344

By facsimile:

f: +357 22763355

**Appendix A – Client Complaint Form**

**A. Client Information:**

Full Name: _____
Account Number: _____ I.D. / Passport Number: _____
Domicile Address: _____
Telephone Number: _____ Fax Number: _____ Email: _____

**B. Details of the Complaint (full description, including the service to which the complaint refers to, the details of the employee that undertook to provide the service to the Client, dates, figures, amounts, etc.)**

_____
_____
_____
_____
_____

Client Signature: _____	Date: _____
-------------------------	-------------

<b>For Company Use Only:</b>	
Complaint Received By: _____	Date: _____
Acknowledgement sent to Client:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Informed Client of initial action:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Final response provided to Client:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Comments: _____	
_____	
Signature of Compliance Officer: _____	Date: _____