

## CLIENTS COMPLAINT HANDLING PROCESS

Version 10.12.2024

### Policy statement

Lime Trading (CY) Ltd (hereinafter "the Company") maintains effective and transparent procedures for the reasonable and prompt handling of complaints or grievances received from clients and keeps a record of each complaint or grievance and the measures taken for the complaint's resolution.

Complainant means any person, natural or legal, which is eligible for lodging a complaint to a CIF and who has already lodged a complaint. The complaint can be defined as a statement of dissatisfaction addressed to the Company by a complainant relating to the provision of an investment service provided by the Company under Law 87(I)/2017 regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets.

Claims, including applications and complaints (hereinafter jointly referred to as "claims"), shall be submitted in writing and signed by the Client or an authorized representative of the client<sup>1</sup>.

The claim shall contain:

- the essence of the claim and the demands of the Party which initiated this claim;
- the amount of the claim and its calculation (if the claim is subject to pecuniary valuation);
- summary of circumstances on which the applicant's requirements are based and evidence substantiating them with reference to corresponding legislative and statutory documents;
- the list of documents attached to the claim and other evidences;
- other data necessary for the settlement of a dispute.

Claims, which do not contain data on the Client's name or the location (address) shall be classified as anonymous and left without consideration.

All Complaints must be reported to Lime Trading (CY) Ltd, in writing, within the period given in the Company's Regulations as published from time to time on the Company's website, from the occurrence of the event that gives rise to the Complaint. Failure to object within the above-mentioned time period shall be deemed ratification by the Client of all actions undertaken by the Company prior to making the Complaint.

The Company shall have the right to request the Client (complainant) for additional documents and data. The term of reviewing a claim shall be extended for the period of submitting documents.

<sup>1</sup>Only complaints submitted by the Client or a person authorized to act on behalf of the Client will be reviewed and investigated.

## **Procedure for handling complaints**

The complaints management policy and procedures for handling complaints are implemented and maintained by Lime Trading (CY) Ltd is designed to be:

- be simple and clear;
- ensure that customers are treated fairly;
- be effective and aid decision making;
- ensure fair outcomes.

The Company shall:

- investigate the complaint competently, diligently and impartially;
- assess fairly, consistently and promptly:
  - ✓ what the complaint is about;
  - ✓ what action/redress should be taken.
- provide fairly and promptly:
  - ✓ a clear assessment of the complaint; and
  - ✓ an offer of redress or remedial action, if appropriate.
- ensure any offer of redress or remedial action that is accepted is settled promptly.

The Company's employees dealing with complaints handling have a strong client focus in order to address concerns, whether they are complaints, grievances or suggestions. The aim of the Company is to provide a high level of customer service, by resolving complaints fairly and efficiently. To that end the responsible employees:

- seek assistance from the staff and the relevant department (related to the complaint) in the complaint's handling process;
- investigate further to make sure that all the relevant information is adequate and accurate (This could include interviewing staff member(s) involved, clearing up any misunderstandings, or seeking advice from the Company's legal consultants.);
- ensure that accurate records are maintained in respect of all complaints resolved;
- evaluate the data and determine the causes of complaints and whether remedial action is required;
- ensure that all complaints are heard and equitably resolved as soon as possible.

## **Submission of complaints**

In order to make a formal complaint a Complainant shall complete the Customer Complaint Form which is an integral part of the Clients Complaint Handling Process. All details requested in the Customer Complaint Form shall be provided.

Customers may file a complaint by the following methods:

- Email sent to: [support@limefintech.com](mailto:support@limefintech.com)
- By Letter, addressed to: Magnum Business Center, 4B, Spyrou Kyprianou Avenue 78, Limassol 3076, Cyprus
- By Fax to: +357 25 344564.

Upon receiving the complaint, the Company must register the complaint directly to an internal register, giving it a unique reference number.

The Company shall communicate to a Complainant relevant unique reference number and inform that he/she should use the said reference number in all future contact with the Company, the Financial Ombudsman and/or the Cyprus Securities and Exchange Commission regarding the specific complaint.

The Company shall confirm, within 5 (five) calendar days, the receiving of the complaint to the Complainant.

### **Assessment and review of complaints**

Upon receipt, the complaint will be forwarded to the responsible employees' handling the complaints, who will investigate the complaint diligently, fairly and promptly.

The Company should respond without any unnecessary delay. Period of clients' complaints consideration is set out in section 19 of the Regulations from the provision of investment and agency services on the Securities market.

When an answer cannot be provided within the expected time limits, the Company should inform the complainant about the causes of the delay and indicate when the Company's investigation is likely to be completed. This period of time cannot exceed 3 (three) months from the submission of the complaint. Once the investigation will be completed the complainant will be sent a final response with the findings and the outcome of the complaint.

The reply should be made in writing and sent to the email address of the complainant. The claim can be left without consideration if the repeated claim does not contain new data, and all the reasons stated in it were reviewed earlier in full and objectively, and the response was sent. Simultaneously, the notice about leaving the claim without consideration, with reference to the previously given response shall be presented to the complainant.

### **Response**

Once the assessment, review and investigation of the complaint is completed any made decision, finding or outcome, will be communicated to the complainant together with an explanation. The complainant will be compensated appropriately if the complaint is upheld.