

CLIENT COMPLAINT PROCEDURE

1. Introduction

Following the implementation of the Markets in Financial Instruments Directive (MiFID) and in accordance to the provisions of the Directive for the Authorization and Operating Conditions of the Cyprus Investment Firms (DI144-2007-01), Consulco Capital Ltd (hereinafter called the “Company”) is required to establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints received from retail clients or potential retail clients, and to keep a record of each complaint and the measures taken for the complaint’s resolution.

2. Procedure

Complaints may be submitted in writing, orally, by fax or by email at the contact details provided below:

1. Postal Address: 73 Metochiou Str., Engomi 2407, Cyprus (Attention to: Complaints Handling Officer)
2. By telephone: (+357) 22 361300
3. By Facsimile: (+357) 22 752597
4. By email: complaints@consulcocapital.com

All complaints shall be dealt by the Company’s Complaint Handling Officer in accordance with the procedures set below:

- A. All complaints must be acknowledged in writing within 7 business days of being received. The written acknowledgment sent by the Company to the complainant will include details as to the name and capacity of the person dealing with the complaint. Depending on the significance of the complaint, this acknowledgement may also include a resolution to the complaint.
- B. If it is NOT possible to resolve the complaint within 7 business days, a letter of acknowledgement should state that the complaint is under investigation and that upon completion, the complainant will be informed in writing of the outcome of the investigation.
- C. In case the investigation is not concluded within four weeks following the submission of the complaint, the complainant will be informed in writing on the investigation’s progress, the reason why the Company was unable to resolve the complaint in the aforementioned time frame, and an indication of when further contact will be made.
- D. Within 7 business days of the completion of an investigation a written report must be sent to the complainant explaining clearly:
 - i. The outcome of the investigation.
 - ii. The nature and terms of any offer of settlement which the Company is prepared to make in satisfaction of the complaint.
 - iii. The reasons for declining to offer a settlement.

- iv. A statement of the fact that the Company will treat the complaint as settled if the complainant does not indicate dissatisfaction within one month of receiving the report.
- E. Finally, the Company will inform the complainant that he may refer the complaint with a copy of the final response to the Cyprus Securities and Exchange Commission for further investigation.

Note: The Company shall cooperate with the Cyprus Securities and Exchange Commission in case it carries out its own investigation in relation to a client's complaint.