

1. COMPLAINT MANAGEMENT PROCEDURE

- 1.1 This document is a part of a set of policies of Roemer Capital (Europe) Limited (former Sinara Financial Corporation (Europe) Ltd) (**Company** or **we**), a Cypriot investment firm regulated by Cyprus Securities and Exchanges Commission, License 305/16.
- 1.2 This Complaint Management Procedure (**Procedure**) is established in accordance with the following framework:
- Directive 2014/65/EU (**MiFID II**): art. 16(2)
 - MiFID II Delegated Regulation: rec. (29), (38), art. 22(2)(c) and (d), art. 26
 - CySEC Circular 338 – Guidelines for complaints-handling for the securities sector – Handling of client’s complaints by CIFs
 - ESMA and EBA Guidelines on complaints-handling for the securities and banking sector (04/10/2018, JC 2018 35)
- 1.3 This Procedure describes how our clients (**Client** or **you**) can submit a complaint and how we will assess and investigate your complaint. The Procedure also describes your rights in case you are not satisfied by the outcome of our assessment.

2. SCOPE OF PROCEDURE

- 2.1 We adhere to provide you with the best experience while using our services but understand that sometimes a grievance might occur. For this purpose, we have developed this Procedure to navigate you through the process of complaint submission and further investigation.

3. DEFINITIONS

- 3.1 **Complaint** means a statement of dissatisfaction addressed to the Company by a natural or legal person relating to the provision of an investment service provided under MiFID II framework.
- 3.2 **Complainant** means a natural or legal person who is presumed to be eligible to have a complaint considered by the Company and who has already lodged a complaint.

4. SUBMISSION OF COMPLAINT

- 4.1 In case of any grievance, you may communicate with us using any appropriate means of communication (telephone, e-mail, fax, post). We will try to resolve your problem in an appropriate manner. Nevertheless, should you want to submit a formal complaint, you must complete ‘Client Complaint Form’ and send it to us in one of the following ways:
- **via e-mail** at complaints@roemercapital.com

- **via fax** at +357 25059301, or
 - **via post** at Georgiou Karaiskaki 17, Limassol Business Centre, 4th Floor, Office 4, 3032, Limassol, Cyprus
- 4.2 Any complaint submitted shall be free of charge. We will not charge the complainant any fee for receipt, acceptance, or investigation thereof.
- 4.3 Please note that we shall not consider any complaints submitted via any website contact forms whether at our official website or elsewhere. Any complaint sent to an e-mail address other than that indicated in the clause 4.1. hereof will not be deemed as a submitted formal complaint. Please note, that we will not consider complaints submitted orally, or any anonymous forms, or grievance with other firms, or any complaints not related to investment and ancillary services provided by us. If your complaint lacks some details or is submitted orally, we will remind you on how to lodge a complaint and what data is necessary for the complaint to be registered on our side.
- 4.4 We will acknowledge receipt of your complaint within 5 (five) working days. We will register your complaint by giving it its own unique number which you shall use when communicating with us or regulatory authority.
- 4.5 We kindly ask you ensure that you have listed the following details:
- 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.

5. INVESTIGATION

- 5.1 We undertake to investigate the complaint competently, diligently and impartially, obtaining additional information as necessary. All complaints will be investigated carefully provided that all relevant information and evidence has been gathered. The facts alleged in the complaint will be verified for accuracy. Written documents contained in our files will be relied upon to the fullest extent possible in ascertaining the truthfulness of the facts and allegations.
- 5.2 We will provide an official answer for the complaint within two (2) months from the date of receipt. In some exceptional cases, we may extend the time period for responding by an additional thirty (30) days if we have been unable to resolve the complaint within the above two (2) month period. In such case, we will notify you in writing of the extension and the reasons for the extension. In any event, the revised term should not exceed three (3) calendar months from the date of receipt of the complaint, unless litigation matters arise. In case a resolution is not possible within this timeframe, we will notify you in writing.
- 5.3 We will assess fairly, consistently and promptly:
- the subject matter of the complaint;
 - whether the complaint should be upheld;

- what remedial action or redress (or both) may be appropriate; and
 - if appropriate, whether it has reasonable grounds to be satisfied that another respondent may be solely or jointly responsible for the matter alleged in the complaint.
- 5.4 Once we have finalized our investigation, we will notify you in writing of our findings and any actions taken. Our final complaint resolution letter will include either:
- a statement that we have corrected any error(s) identified by you, which will include a written notification of the correction, the effective date of the correction; or
 - a description of the results of a reasonable investigation performed on our part and a written notification that includes:
 - a statement that the Company has determined that no error occurred;
 - a statement of the reason(s) for this determination;
 - a statement of that you have the right to request documents relied upon by the us in reaching this determination and information regarding how you can request such documents; and
 - contact information (including a telephone number) for further assistance.
- 5.5 You may inquire or seek further assistance regarding the status or outcome of our investigation by contacting us at complaints@roemercapital.com or by phone at +357 25 059300.

6. FURTHER STEPS

- 6.1 In case you are not satisfied with the outcome of our investigation, you have the right to escalate the complaint to the Financial Ombudsman or **Cyprus Securities and Exchange Commission (CySEC)**.
- 6.2 The **Financial Ombudsman** is an independent service for settling disputes between financial firms and their clients. It is important to contact the Financial Ombudsman within four (4) months of receiving a final response from us otherwise the Financial Ombudsman may not be able to deal with your complaint. Please note, that the Financial Ombudsman has limited competency with regard to complaints. To determine whether your complaints may be considered by the Financial Ombudsman and any further helpful information can be obtained from visiting the Financial Ombudsman website, at <http://www.financialombudsman.gov.cy>
- 6.3 If you wish to escalate your complaint to the Financial Ombudsman, you can send an e-mail to: Complaints@financialombudsman.gov.cy with all relevant information / documentation and supporting evidence. In such cases, we will cooperate fully and comply promptly with any settlements or awards made by the Financial Ombudsman.
- 6.4 You may also inform the CySEC about a complaint submitted to us. However, CySEC does not have restitution powers and therefore does not investigate individual Complaints with the aim to resolve the dispute between the two parties. More information can be found at <https://www.cysec.gov.cy/en-GB/investor-protection/how-to-complain/>

- 6.5 If you wish to escalate your complaint to the CySEC, you may contact them by telephone at +357 22506600 or fax at +357 22506700, or by post at P.O BOX 24996, 1306 Nicosia, Cyprus.
- 6.6 If you do not want to accept a decision taken by the Financial Ombudsman you may be able as a last resort, to take your case to court.