

Complaint Handling Policy

February 2025

1. Introduction

Following the implementation of the Markets in Financial Instruments Directive 2014/65/EU (“MiFID II”) and in accordance to the provisions of the Financial Services and Activities and Regulated Markets Law 87(I) 2017 (the “Law”), an in accordance with the ESMA Guidelines, Conotoxia Ltd (the “Company”), as a Cyprus Investment Firm, regulated by Cyprus Securities and Exchange Commission (“CySEC”) with license number 336/17 is required to establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints received from clients and to keep a record of each complaint(s) as well as the measures taken for the complaint(s)’ resolution.

2. Scope

The Company has the responsibility of enabling clients to express their dissatisfaction with investment and/or ancillary services provided by the Company and handle client(s)’ complaints fairly, ensuring that possible conflicts of interest are identified and mitigated.

3. Definitions

“Query” means a request for data or information or assistance.

“Dispute” means a disagreement between two or more parties, and it can arise over different issues.

“Complaint” means an expression/statement of dissatisfaction addressed to the Company, by a client (natural or legal person), relating to the provision of investment and/or ancillary services.

“Complainant” means a person, natural or legal, that has opened a trading account with the Company, has agreed to the Terms and Conditions of the Company and has submitted a Complaint.

“Complaint Handling Officer” means Compliance Officer/Function.

4. Queries and Disputes

In cases where client(s) is displeased with the Company’s services, or has any query(ies) with regards to trading account(s)’, client(s) should contact the **Customer Support Department** via:

Email: support@cy.conotoxia.com

Telephone: +357 25 030046

The Company’s Customer Support Department will try assisting client(s) with the aim of resolving the relevant query(ies) immediately. In cases where the relevant query(ies) cannot be solved immediately, further investigation is required.

Client(s) may escalate the query to the complaint following the process indicated in the following section.

5. Official Complaint

Only complaints made by client(s) using the Client Complaint Form, duly signed by the relevant client, shall be considered as a complaint. The complaints should be accompanied by adequate supporting documentation/evidence (as the case may be).

6. Procedure

Client(s) can submit a complaint, free of any charges.

A complaint must not include offensive language towards the Company, or towards an employee of the Company.

6.1 Submission of the complaint by clients

Complaint(s) should be submitted in writing, using Client Complaint Form (Appendix 1), by post or by email only at the contact details provided below:

- a) Postal Address: Chryssorroiatissis 11, 3032 Limassol, Cyprus (Attention to: Compliance Officer)
- b) By email: compliance@cy.conotoxia.com

The reference number will be assigned to the complaint, composed of ten (10) digits. This unique reference number will be communicated to the complainant, who shall be using it in any future contact with the Company, CySEC and/or the Financial Ombudsman.

6.3 Acknowledgement of complaint(s)

All complaints of the Company shall be acknowledged, in writing within **five (5) business days** of being received. The written acknowledgment sent by the Company to the complainant will include the complaint's unique ten (10) digit reference number, as well as details of the name and capacity of the person dealing with the complaint.

6.4 Handling of complaint(s)

The Complaint Handling Officer will investigate the complaint and respond, within two (2) months, to the Complainant about the outcome/decision. In cases where the investigation is not concluded within two (2) months following the submission of the complaint, the Complainant will be informed, in writing, of the reasons for the delay and the expected completion of the investigation process (this period will not exceed three (3) months from the submission of the complaint).

6.5 Final Decision

Finally, the Company will inform the Client/complainant(s) that, in cases where not satisfied with the Company's final response, the Client may refer to CySEC (electronically: <http://www.cysec.gov.cy/en-GB/complaints/how-to-complain/>) for further investigation or the Financial Ombudsman of Cyprus.

A complaint to the Financial Ombudsman should be filed within four months from the receipt of the response from the Company.

Note: Client(s) may submit complaints with CySEC however, it should be noted that the CySEC does not have restitution powers and therefore does not investigate individual complaints. Further information as to the procedure you need to follow can be found on <https://www.cysec.gov.cy/enGB/complaints/how-to-complain/>. It is understood that client(s)' right to take legal action remains unaffected by the existence or use of any procedures referred to above.

The details of the Financial Ombudsman of the Republic of Cyprus are:

Address: P.O. Box 25735, 1311 Nicosia, Cyprus

Phone: +357 22 848900

Facsimile (Fax): +357 22 660584, +357 22 660118

email: complaints@financialombudsman.gov.cy

Financial Ombudsman: fin.ombudsman@financialombudsman.gov.cy

Website: www.financialombudsman.gov.cy

The details of the Cyprus Securities & Exchange Commission ("CySEC") are:

Address: 19 Diagorou Street, 1097 Nicosia, Cyprus

P.O Box 24996, 1306 Nicosia, Cyprus

Telephone: +357 22 506600

Fax: +357 22 506700

e-mail: info@cysec.gov.cy

Website: www.cysec.gov.cy

7. Policy Review

The Policy is approved by the Board of Directors and undergoes regular review annually and/or as and when it is deemed necessary based on the regulatory or operational requirements.

Appendix 1

CLIENT COMPLAINT FORM

Below information should be completed.

Please note that the Complaint form is only indicative and not exhaustive, therefore the Conotoxia Ltd (the “Company”) may request further clarification and evidence for the efficient investigation and resolution of the complaint.

Client Information	
Name and Surname	
ID / Passport Number	
Trading Account Number	
Country of Residence	
Nationality	
Phone Number	
Email Address	
Company’s Representative Name	
Company’s Representative Email Address	
When the incident you are complaining about occurred?	
Complaint Details	
Please provide a Summary of your complaint below. We kindly request you to justify the disputed amount and to include any information that will facilitate the Company in the investigation of your complaint (eg. Date and time the incident occurred, incident	

description, transaction number(s) of the disputable and/or pending order(s), department, financial loss, employee etc).

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Have you contacted the authorities with regards to your complaint?	<input type="checkbox"/>
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If you answered yes, which financial authority you have contacted?	
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In order to facilitate the resolution of the complaint, we kindly ask you to provide any relevant evidence supporting your complaint such as screenshots or email communication supporting your complaint.

Signature:

Date:

FOR OFFICIAL USE ONLY

Received on:

Received by:

Assigned to:

To reply by: