

## Complaints Policy for Clients

We, Ayers Alliance Financial Group Ltd (hereinafter “AAFG”, “We” or the “Company”), have adopted this Complaints Policy to ensure a fair and appropriate process for handling complaints that may arise from our relationship.

Ayers Alliance Financial Group Ltd is authorized and regulated by the Cyprus Securities and Exchange Commission as a Cyprus Investment Firm with a CIF License Number 230/14. Currently, the Company is under examination for voluntary renunciation of its CIF authorization. The Company is registered in Cyprus under the Companies Law, with registration number HE 315127.

We establish and implement effective and transparent procedures for the reasonable and prompt handling of Client Complaints, and we maintain records of each Complaint and the measures taken for their resolution, in line with CySEC’s complaints handling circular and applicable legislative standards.

Under this policy a “**Complaint**” shall mean the expression of dissatisfaction by a Client (hereinafter the “Complainant” or “Client”) with the investment and/ or ancillary services provided by AAFG. The Company shall record and handle a Complaint as such only if the Client submits a duly signed, completed, Complaint Form accompanied by adequate supporting evidence.

### **1. Submitting your Complaint**

Should you wish to submit an official Complaint, please complete the **Complaint Form** of Appendix B and then send it to the following email address [complaint@aafg.co](mailto:complaint@aafg.co) accompanied with all the relevant evidence. The relevant form is also available to clients and potential clients online on the Company’s homepage and [here](#), at all times.

To view or download the Complaint Form from the Company’s website you can follow the next steps:

From the Company’s website [aafg.co](http://aafg.co) > choose the category “Support Center” from the upper menu bar, and then from the left navigation menu that appears select the option “Documents and Requests”. The Complaints form is available in the middle of the page among the other clients’ forms and documents.

For your ease, the updated version of the Complaints Form is also attached as Appendix B at the end of this Complaints Policy as well in the relevant hyperlink on our homepage.

Complaints made by Clients cannot be considered unless the Complaint Form is duly completed and signed, and it is accompanied by adequate supporting evidence that matches our Client’s claims.

We encourage our clients to fill in the Complaints Form electronically to avoid any misspelling of numbers or letters that may cause a delay in the processing.

Any other query and/or concern and/or issue you may have in respect of the services provided by AAFG should be made in writing and addressed to the email address [info@aafg.co](mailto:info@aafg.co).

### **2. Handling of your Complaint**

Upon receipt of a duly completed and signed Complaint Form, the case will be recorded internally as an official Complaint.

The assigned Complaints officer will reply to the Client by email, within five (5) days from the day of receipt of the Complaint. The initial holding response to the Clients includes the following:

- an acknowledgment that the Complaint Form is being received;
- a Unique Reference Number;
- information to the complainant that the aforementioned reference number shall be used in all future contact with the Company, the Financial Ombudsman and/or the CySEC regarding the specific complaint. Please see the relevant contact details in Appendix A at the end of this Policy.

The Company will attempt to resolve the Complaint within two (2) months from the time received. In investigating a Client Complaint, the Company takes into account the subject matter of the Complaint, the contents of the duly completed and signed Complaint Form, the evidence the Client has provided, and the evidence in our records. As part of our investigation, we may share and receive information (including personal, financial and trading data) regarding a Client complaint with/from third parties (e.g. with the CySEC, the Financial Ombudsman of Cyprus, our legal advisors or with another company of the AAFG group in line with our [Privacy Policy](#).

If the Company is unable to resolve a Complaint within two (2) months, the Company will update the Client on the status of his/her Complaint and will continue to do so until such time as the investigation is complete. According to applicable regulatory obligations, the Company has an additional month to resolve a Complaint, if it is unable to resolve a Complaint within two (2) months (i.e., a Final Response should be issued within maximum three (3) months from the day of the Complaint).

In the unlikely event that the Company was unable to provide you with a final response within the three (3) month time period specified above you may again contact the office of the Financial Ombudsman of the Republic of Cyprus (please see contact details in Appendix A) no later than four (4) months after the date when we ought to have provided you with our final decision.

Further clarifications and information relating to the Complaint may be requested from the Client, as necessary. Please note that the Company shall consider your complaint as closed and cease the relevant investigation in case you fail to respond to our officers within the period of three (3) months from the date of the submission of your complaint or from the date of your latest communication with the Company, whichever date is later, and due to this, the investigation cannot be carried forward. We will require your full cooperation in order to expedite the investigation and possible resolution of your complaint.

Once a Complaint's investigation is completed, a Final Response shall be provided to the Client with the investigation's outcome(s) together with any required explanations and any remedy measures the Company intends to take.

A Final Response is a written response from the Company which either:

- a. accepts the Complaint and, if offers appropriate redress (this may not involve financial redress, but can simply involve an apology);
- b. offers redress without accepting the Complaint, as a gesture of goodwill and in accordance with the Company's policy to resolve complaints in amicable and good business terms; or
- c. rejects the complaint and provides a reasonable explanation. Further clarifications on the Final Response may be provided following Client's subsequent communication with the Company. A Complaint will be deemed as resolved or settled where the Company has sent in writing a Final Response and/or further clarifications on the Final Response to the Client.

If you are still not satisfied with our final decision you may maintain your complaint by contacting, within four (4) months after we have provided you with our final decision, the Financial Ombudsman Service of the Republic of Cyprus and the Cyprus Securities and Exchange Commission.

The Complainant may maintain his/her complaint with the Cyprus Securities and Exchange Commission (please see contact details in Appendix A), however, it should be noted that the Cyprus Securities and Exchange Commission does not have restitution powers and therefore, does not investigate individual complaints. It is understood that the Complainant's right to take legal action remains unaffected by the existence or use of any complaints procedures referred to above.

Questions regarding the Client Complaints Policy may be also sent in writing to [complaint@aafig.co](mailto:complaint@aafig.co).

### **3. Disclosure and Update of the Policy**

The Complaints Policy and Form for Clients is disclosed on the Company's website in and is accessible to clients and potential clients at all times. This Policy shall be regularly reviewed and updated by the Compliance Function and in line with applicable legislation updates, and each updated version shall be approved by the Company's Board of Directors.

### **4. Records and Reporting**

The Company is required to keep and update records of all the Complaints received by Clients among the details of the investigation conducted, the final outcome of these investigation, any remedy measures undertaken and all the communication with the Clients.

The Compliance Department shall maintain the appropriate records in this respect shall regularly monitor and review the Company's compliance with the applicable regulatory requirements for handling Client Complaints and the record-keeping. Furthermore, the Compliance Function shall report regularly to CySEC information regarding Client complaints filed to the Company.

## **Appendix A-Contact Details**

➤ **The contact details of the Ayers Alliance Financial Group Limited:**

Postal Address: 4/F, KIBC, 4 Prophet Ilia Street, Limassol 4046, Cyprus  
Telephone: +357 2526 2202  
Fax: +357 2528 1903  
Email: [complaint@aafg.co](mailto:complaint@aafg.co)  
Website: [aafg.co](http://aafg.co)

➤ **The contact details of the Financial Ombudsman of the Republic of Cyprus:**

Postal Address: P.O. BOX 24996, 1306 Nicosia, Cyprus  
Telephone: +357 22 848900  
Fax: + 357 22 660584, +357 22 660118  
Email: [complaints@financialombudsman.gov.cy](mailto:complaints@financialombudsman.gov.cy)  
Website: [www.financialombudsman.gov.cy](http://www.financialombudsman.gov.cy)

➤ **The contact details of the Cyprus Securities and Exchange Commission:**

Postal Address: P P.O BOX 24996, 1306 Nicosia, Cyprus  
Telephone: +357 22506600  
Fax: +357 22506700  
Email: [info@cysec.gov.cy](mailto:info@cysec.gov.cy)  
Website: <http://www.cysec.gov.cy>

## APPENDIX B – Client Complaint Form

Please complete, sign and send a copy of your Complaint Form by email to [complaint@aafg.co](mailto:complaint@aafg.co) Please enclose together with your Client Complaint Form, any supportive evidence and any other relevant documentation. The Company may request further information and/or clarifications and/or evidence as regards to your complaint. Please note that the submission of a complaint is free of charge.

<u>Client Complaint Form</u>	
<b>Client Information and Contact Details</b>	
Name and Surname (in case of a legal person provide company's name and the name of the natural person acting as a legal representative)	
Passport Number (please enclosed a colour certified true copy of your new passport if not provided to the Company yet)	
ID Number (in case of a legal person also provide the entity's registration number)	
Country of Nationality and Incorporation Country (in case of legal person)	
Postal Address (City/Province, Country, Code)	
AAFG Account Number	
Telephone Number	
Registered email	
<b><u>Complaint Description</u></b>	
Date when the Complaint was created:	
Disputed/Claimed Amount (currency & amount):	
Description of the Complaint (use a separate sheet if necessary):	
<b><u>Please enclose supporting evidence and any other relevant documentation.</u></b>	
<b><u>Client Signature</u></b>	
I hereby confirm that the information included in this Complaint Form is accurate and truthful.	
Signature:	
Date: ...../...../.....	