

## Client Complaints & Disputes Summary Policy

### Purpose and Scope

The Client Complaints & Disputes Summary Policy (the "Policy") provides Ayers Alliance Financial Group Ltd (hereinafter "AAFG" or the "Company") appropriate and efficient procedures for handling any Complaints that may result from the relationship with the Client.

This Policy is meant for use by Ayers Alliance Financial Group Ltd, its Clients/prospective Clients and relevant regulators.

Following the implementation of the Markets in Financial Instruments Directive (MiFID II) AAFG is required to establish, implement and maintain effective and transparent procedures for the prompt handling of Complaints received from clients' or potential clients. AAFG shall keep a record of the complaint received and the measures taken for their resolution.

The Company shall ensure that their procedures for the handling of Client Complaints are broadly based on the following principles:

- **Independence:** AAFG shall seek to provide an impartial service, which is accessible and freely available to the general public, with regards to Complaints against the Company and its services.
- **Transparency:** AAFG shall ensure that Clients have all the necessary information about the procedures for handling their Complaints on transactions.
- **Adversarial:** AAFG shall ensure that the Complainant, and any other interested party in the Complaint are given an opportunity to interact with the Complaints Manager. The Complaints Manager shall inform such parties about the progress of the investigation and their Complaint.
- **Effectiveness:** AAFG shall ensure that Clients will benefit from the advantages of its Client complaint handling procedures, i.e. to provide:
  - Access without being obliged to utilize a professional representative (e.g. an accountant);
  - A procedure which is free of charge;
  - A procedure which ensures minimum bureaucracy, no undue delays and which does not deprive the Client of the protection afforded by any Client protection legislation.

The Complaints Manager of the Company at this time shall be the Company's Compliance Officer, except in situations where the Complaint involves the Compliance Officer, in which case these Complaints will be handled by a member of Senior Management.

### General Procedures

- The Complainant should submit a Complaint through [complaint@aafg.co](mailto:complaint@aafg.co) or through the other contact details as these are listed below.
- All Complaints will be acknowledged in writing within two (2) business days of being received.
- An internal register is in place and as soon as the Complaint is received, it is allocated a unique reference number (URN). Following this, the URN is entered into a log. The first two digits of the URN are the code of the CIF regarding the Transaction Reporting System (TRS), the following four digits define the year, and the last four digits denote the number of each complaint serial number (e.g. AA20180001).
- The written acknowledgement sent by the Company to the Complainant will include the Complainant's unique ten-digit reference number, the timeframe in which a response will be given and enclose the complaints handling procedure. The Complainant is informed to use the said URN in all future contact with AAFG, the Financial Ombudsman and or CySEC regarding the specific Complaint. The acknowledgement will also provide the name and capacity of the person dealing with the Complaint and if a resolution is not provided in the initial communication, the letter of acknowledgement will confirm when a further update will be provided.
- If a resolution 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 when they should expect completion of the investigation process (this period will not exceed three (3) months from the submission of the Complaint).

- Within fourteen (14) business days of the completion of an investigation a written report must be sent to the Complainant explaining clearly:
  - The outcome of the investigation,
  - The nature and terms of any offer or settlement with the Company is prepared to make in satisfaction of the Complaint
  - The reason for declining to offer a settlement
  - 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.
- The Company will inform the Complainant that in the case he/she is not satisfied with the Company's final decision he/she may refer the Complaint with a copy of the final response to the Cyprus Securities and Exchange Commission or the Financial Ombudsman of the Republic of Cyprus for further investigation, or take civil action.
- Every month the Company shall provide to CySEC information regarding any Complaints it has received, pertinent details regarding the Complaint/Complainant and the status. In particular, the Company completes every month (reporting month) the form XX\_yyyymmdd\_T144-002-01 and sends it to CySEC electronically within five days after the reporting month. The URN given to each Complaint shall be mentioned on the form.

### Handling Process

On receipt of a Complaint, the Company shall investigate the following issues:

- Whether or not the Complaint falls within the responsibilities of the Company and the role of the Complaints Manager;
- Whether or not the Complaint is one which should be dismissed without consideration of its merits.

Where the Complaints Manager considers that both the Complaint and the Complainant fall within the responsibilities of the Company and that there is a reasonable prospect of resolving the Complaint amicably, he/she will start the investigation, providing all relevant parties an opportunity to provide all relevant information.

### Contact Details

Clients can contact the Complaints Manager as follows:

#### By Post:

Ayers Alliance Financial Group Ltd, 4/F, KIBC, 4 Prophet Ilia Street, Limassol 4046, Cyprus

Email: [complaint@aafg.co](mailto:complaint@aafg.co)

#### By Telephone or Fax:

Tel: +357 2526 2202

Fax: +357 2528 1903

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

Main Address: 13 Lordou Vironos Avenue, 1096 Nicosia, Cyprus

Postal Address: P.O. BOX 24996, 1306 Nicosia, Cyprus

Tel: +357 22 848900

Fax: + 357 22 660584, +357 22 660118

Website: [www.financialombudsman.gov.cy](http://www.financialombudsman.gov.cy)

It is important the Complainant to contact the Financial Ombudsman of the Republic of Cyprus within four (4) months of receiving a final response from the Company otherwise the Financial Ombudsman of the Republic of Cyprus may not be able to deal with the Complaint.

#### The details of the Cyprus Securities and Exchange Commission:

Main Address: 27 Diagorou Street, 1097 Nicosia Cyprus

Postal Address: P.O. BOX: 25735, 1311 Nicosia, Cyprus  
Tel: +357 22506600  
Fax: +357 22506700  
Email: [info@cysec.gov.cy](mailto:info@cysec.gov.cy)

The Complainant may maintain his/her complaint with the Cyprus Securities and Exchange Commission, however, it should be noted that the Cyprus Securities and Exchange Commission 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 the Complainant's right to take legal action remains unaffected by the existence or use of any complaints procedures referred to above.

**A FULL COPY OF THE COMPANY'S COMPLAINT & DISPUTE POLICY IS AVAILABLE UPON REQUEST**

**Addendum I**

<b><u>Client Complaint Form</u></b>		
<b>Complainant Contact Details</b>		
Name	_____	
Address	_____	
Trading Account No	_____	
Tel (Work)	_____	
Tel (Mobile)	_____	
Email	_____	
<b>Complaint Description</b> <i>(Please indicate relevant dates and positions as well as any previous communication with the Company)</i>		
<b>Questions</b>		
Have you referred the complaint to any other regulatory body or authority?	Y	N
Have you initiated legal proceedings?	Y	N
<b>Client Confirmation</b>		
I hereby confirm that the information included in this Complaint Form is accurate and truthful.		
Signature:	_____	
Date	_____	