

PMT MATRIX CAPITAL LTD

**Approved by the Board of Directors
On 21 December 2016**

COMPLAINTS HANDLING POLICY

LIMASSOL 2016

COMPLAINTS HANDLING POLICY

This Complaints Handling Policy (hereinafter – «the Policy») of PMT Matrix Capital Ltd (“the Company”) is a document which describes the procedures for receiving, handling and processing of the complaints and grievances received from the Company’s clients or potential clients.

Except as expressly provided otherwise, all terms and definitions stated in this document shall have the meanings assigned to them by relevant legislative acts of the Republic of Cyprus and European Union.

The Company’s goal is reasonable and prompt handling of complaints or grievances received from clients or potential clients, and taking all necessary measures for the complaint’s resolution. The complaints handling procedures are defined and endorsed by the Senior Management and the Board of Directors, who is responsible for its implementation and for monitoring the Company’s compliance with it.

COMPLAINTS SUBMISSION

Clients can submit a complaint to the Company by using the Client Complaint Form (attached as Annex I to the present Policy). In specific:

1. The client is kindly requested to duly complete the form providing all relevant requested information, sign and stamp, and supporting documentation where applicable.
2. The form can be sent to PMT Matrix Capital Ltd by the following means:
 - by e- mail at info@pmt.com.cy,
 - by fax +357 25 25 26 31
 - by mail to Magnum House, 10 Chrysanthou Mylona, 3030, Limassol, Cyprus.
3. Complaints can also be submitted to the office of the Financial Ombudsman of the Republic of Cyprus as specified at the website www.financialombudsman.gov.cy.
4. As an alternative Complaints can also be submitted to the Cyprus Securities and Exchange Commission via the website <http://cysec.gov.cy/en-GB/complaints/how-to-complain/>

COMPLAINTS RECEIPT

Following receipt of the complaint by the Company and not later than within five days the client will receive a relevant acknowledgement e-mail indicating unique ten digit reference number of the complaint, the name and position of the responsible person, and the expected timeframe for investigation and resolution of the problem. The client should use the said reference number in all future contact with the Company, the Financial Ombudsman and/or the CySEC regarding the specific complaint.

EXPECTED TIMELINE

The Company investigates the complaint and reply, as soon as possible and in any case within two months, to the complainant about the outcome/decision. Only in the event that the Company is

unable to respond within two months the period for the investigation and reply can be extended. This extended period of time cannot exceed three months from the submission of the complaint.

COMPLAINTS INVESTIGATION PROCEDURE

The responsible officer together with the head of the related Department gather and investigate all relevant evidence and information regarding the complaint. The events leading to the complaint or grievance are examined and assessed based on the information provided by the Client. The facts stated by the Client are examined and it should be decided whether any further additional information needs to be retrieved from the Company's data or requested from the Client.

Upon completion of the investigation, the responsible officer prepares a relevant report and submits it to the Supervisory Board and to the Chief Executive Officer, who decide on the response to the Client and the action to be taken. All non-trivial complaints or grievances are brought to the attention of and their resolution is approved by the Board of Directors.

PROVIDING INFORMATION TO THE CLIENT/COMPLAINANT

During the investigation of the complaint, the responsible officer informs the complainant of the handling process of his/hers complaint. If the period of investigation is extended the responsible officer informs the complainant of the reasons for the delay and indicates the period of time within it is possible to complete the investigation.

Upon completion of the investigation, the complainant receives a written reply from the Company informing about the decision taken after the investigation of the complaint. In the case of the complaint acknowledgement the Company informs also about taking the necessary actions needed to resolve the complaint, and provide an approximate timescale required to do so.

ADDITIONAL OPPORTUNITIES

If the Company's final decision does not fully satisfy the complainant's demands, he or she has an option to maintain the complaint e.g. through the Commission, the Financial Ombudsman, ADR Mechanism, or the relevant Courts. If the client does not want to accept a decision taken by the Company or Financial Ombudsman the client may be able to take his (or her) case to Court. The client would usually start civil action in the District Court.

RECORD KEEPING

The Company shall maintain a record of all complaints and related details for a minimum period of five years in accordance with the applicable legislation.

REVIEW OF THIS POLICY

This Policy will be reviewed and/ or amended from time to time and/ or as and when considered necessary by the Board of Directors and the Compliance Officer and may be amended by the Company from time to time. In such case the policy on our website will be replaced with the amended policy.

Please contact us at info@pmt.com.cy if you have any additional inquiries and/or questions.

ANNEX I

CLIENT COMPLAINT FORM

CLIENT COMPLAINT FORM	
DATE	
DETAILS OF THE IDENTITY OF THE CUSTOMER WHO FILED THE COMPLAINT (Surname and Name, ID or Passport Number)	
THE SERVICE TO WHICH THE COMPLAINT REFERS TO	
THE FINANCIAL INSTRUMENT TO WHICH THE COMPLAINT REFERS TO	
DETAILS OF THE EMPLOYEE THAT UNDERTOOK TO PROVIDE THE SERVICE TO THE CUSTOMER	
DEPARTMENT OR ORGANIZATIONAL UNIT TO WHICH THE EMPLOYEE RELATES TO	
DETAILS OF THE COMPLAINT - FULL DESCRIPTION What, where and when happened? Who was involved? Please provide also the name and contact details of the witness if any. (Inform the witness that they may be contacted by the Company to discuss the matter.)	
SUM OF MONEY INVOLVED (POTENTIAL LOSS THAT THE CUSTOMER CLAIMS, HE/SHE HAS SUFFERED OR AS IT IS DERIVED FROM THE CONTENT OF THE COMPLAINT) in EURO	

CONTACT DETAILS OF THE CLIENT	Postal Address: _____ _____ _____ Postcode: _____ Country: _____ Email: _____ Phone No: _____ Mobile: _____
LIST OF SUPPORTING DOCUMENTATION ATTACHED:	1. 2. 3.
CLIENT SIGNATURE	