

## COMPLAINTS HANDLING PROCEDURE

Dragon Capital (Cyprus) Limited (hereinafter referred to as a Company) provides high standard investment services to the customers. The Company serves the customers in the best possible way. However, the Company understands that there are situations when the customers are not fully satisfied with the quality of services provided by the Company.

For such cases the Company maintains an effective and transparent procedure for the reasonable and prompt handling of complaints received from all customers despite of their type and keeps sufficient records of each complaint and the measures taken for the complaint's resolution. Such procedures and records shall be the responsibility of General Manager.

### Procedure for submission a complaint

You can submit your complaint by using a Complaint form provided on our web site or express you complaint in your own words.

You can send your complaint to the following addresses:

- Electronically - Compliance.DCCL@dragon-capital.com
- By fax - +357 25 376 301
- In written form - 69 Gladstonos Str., Acropolis BC, off.402, Limassol, 3040 Cyprus .

Once a complaint is received, it will be registered in the Company's "Internal Registry" under a unique reference number. This reference number will be comprised of ten (10) digits made up by the Company's TRS code (2 digits), the year (4 digits) and the complaint number for the year (4 digits).

This unique reference number will be communicated to the complainant, who shall be using it in any future contact with the Company, the CySEC and/or the Financial Ombudsman.

If a client complains over the telephone or verbally at a meeting, the client must be asked to put in writing his or her complaint with sufficient detail to enable action to be taken. The written complaint should be sent to the Responsible employee who will implement the necessary procedure. The Responsible employee will determine whether there was:

- i. a breach of a client Agreement
- ii. failure to comply with regulatory obligations
- iii. malpractice or impropriety
- iv. repetition or recurrence of any matter about which there has been recent complaint

All Complaints must be acknowledged in writing within five (5) business days of being received. The written acknowledgment sent by the Company to the complainant will include details as to the name and capacity of the person dealing with the complaint. Depending on the significance of the complaint, this acknowledgement may also include a resolution to the complaint.

The Company investigates the complaint and reply, within two months, to the complainant about the outcome/decision. It is provided that, during the investigation of the complaint, the Company informs the complainant of the handling process of his/hers complaint.

In the event that the Company is unable to respond within two months, it informs the complainant of the reasons for the delay and indicates the period of time within it is possible to complete the investigation. This period of time cannot exceed three months from the submission of the complaint.

Resolutions of the complaint will involve relevant employees and management of the Company. All decisions relating to Customers' complaints shall be communicated to customers in writing (including emails) and copies shall be kept in Company's files.

In case the Company receives a complaint it is required to gather and investigate all relevant evidences and information, communicate with customers in a plain language, provide respond without unnecessary delay (or inform the complainant about the delay beforehand), notify the complainant about the option to maintain the complaint through Cyprus Securities and Exchange Commission, Financial Ombudsman, relevant courts). Complaints handling procedure is free of charge.

Submission of information to the CySEC. Every month, the Company should provide to the CySEC information regarding the complaints it receives and how these are being handled.

The Company should complete every month (reporting month) the form XX\_yyyymmdd\_T144-002-01 (excel file, the 'Form') and send it to the CySEC within five days after the reporting month.

The 'Form' is sent in electronic form via the TRS. In the event where the Company has resolved and/or revised a complaint which was referred to the CySEC in a previous submission of the above mentioned 'Form', the Company must complete all the fields of the 'Form' and select the 'U' from the column Record Type.

## Customer Complaint Form

Complaint Date :

Customer Name :

Sales Person :

Investment  
services  
received :

Transaction date :

Actual Complaint :

Proposed Resolution :

Signature :