

## COMPLAINTS HANDLING PROCEDURE

BCM Begin Capital Markets CY Ltd, previously Ox Capital Markets Ltd (hereinafter, the “Company”), has established and implemented an effective and transparent procedure for the reasonable and prompt handling of complaints received from its Clients.

### **1. Definition of a Complaint**

Complaint is considered to be a statement of dissatisfaction addressed to the Company by a client in a documented manner by completing and submitting the relevant *Complaint Form* attached herein and which is relevant to the provision of investment services.

### **2. Submitting your Complaint**

In order to submit your complaint, you are kindly requested to complete and submit your Complaint Form in writing and address it to the Company.

You are encouraged to use the *Complaint Form* attached herein and submit it in any of the following ways:

1. By submitting the Complaint Form electronically at the following email address: [complaints@begincapitalmarkets.com](mailto:complaints@begincapitalmarkets.com)
2. By sending by post or delivering in person the attached Complaint Form at the following address: 39C, Zinonos, 3040, Limassol, Cyprus
3. By Fax at +357 25 030 026

### **3. Acknowledging your Complaint**

We will acknowledge upon receipt of your complaint within five (5) business days from the day we received your complaint. The Company will provide you a unique reference number of your complaint. The unique reference number is an alpha-numeric code which includes the code of the Investment firm, the year and the serial number. The unique reference number should be used in all of your future communication with the Company, the Financial Ombudsman and/or Cypriot Securities and Exchange Commission (“CySEC”) regarding the specific complaint.

### **4. Handling of your Complaint**

Once we acknowledge upon receipt of your complaint, we will review it carefully, investigate the circumstances surrounding your complaint and will try to resolve it without undue delay.

We shall make every effort to investigate your complaint and provide you with the outcome of our investigation within two (2) months from the date you have submitted your complaint to us. During the investigation process we will keep you updated of the handling process of your complaint. One of our officers may contact you directly (including communication by email or phone) in order to obtain further clarifications and information relating to your complaint. We will require your full cooperation in order to expedite the investigation and possible resolution of your complaint.

In the event that your complaint requires further investigation and we cannot resolve it within two (2) months, we will issue a holding response in writing or in another durable medium. When a holding response is sent, it will indicate the causes of the delay and when the Company's investigation is likely to be completed. In any event, we shall provide you with the outcome of our investigation no later than one (1) month from the issuing of the holding response, depending on the complexity of the case and your cooperation.

## **5. Final Decision**

You will be informed on the Company's final decision in respect to your official complaint and you will receive an explanation of the outcome. The Company will suggest remedial measures that it intends to take, which they will lead to a mutual adequate result (if possible).

### **A. Contact Details of the Financial Ombudsman of the Republic of Cyprus:**

**Website:** <http://www.financialombudsman.gov.cy>

**Email:** [complaints@financialombudsman.gov.cy](mailto:complaints@financialombudsman.gov.cy)

**Postal Address:** P.O. BOX: 25735, 1311 Nicosia, Cyprus

**Telephone:** +35722848900

**Fax:** +35722660118, +35722660584

If you are not satisfied with the Company's final decision you may check with the office of the Financial Ombudsman of the Republic of Cyprus and seek mediation for possible compensation. It is important that you 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 your 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 no later than four (4) months after the date when we ought to have provided you with our final decision.

### **B. Contact Details of the Cyprus Securities and Exchange Commission:**

**Website:** <http://www.cysec.gov.cy>

**General email:** [info@cysec.gov.cy](mailto:info@cysec.gov.cy)

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

**Telephone:** +35722506600

**Fax:** +35722506700

You may maintain your complaint with the Cyprus Securities and Exchange Commission. However please note that the Cyprus Securities and Exchange Commission does not have restitution powers and therefore does not investigate individual complaints.

It is understood that your right to take legal action remains unaffected by the existence or use of any complaint's procedures referred to above.

## COMPLAINT FORM

<b>OFFICIAL COMPANY COMPLAINT FORM</b>	
<b><u>DATE:</u></b>	
<b><u>CLIENT DETAILS:</u></b>	
Name:	
Surname:	
Legal Company Name (in case the Client is a legal person):	
Trading Account Number:	
<b><u>CONTACT DETAILS OF THE CLIENT:</u></b>	
Postal Address:	
City/Province:	
Postal Code:	
Country:	
Telephone Number:	
Email:	
<b><u>INFORMATION REGARDING THE COMPLAINT</u></b>	
Date the complaint was created:	

Employee who offered the services to the Client:	
Main remarks of the Complaint: (use separate sheet if necessary)	

**Note:** Kindly provide us with any supporting evidence regarding your complaint that you may have, if applicable, in order to enable the Company to investigate further your complaint.

<b><u>FOR OFFICIAL USE ONLY</u></b>	
Received on:	
Received by:	
Assigned to:	
To reply by:	