

**Leverate Financial Services Ltd**  
*(Regulated by the Cyprus Securities & Exchange Commission)*

# **CLIENT COMPLAINT POLICY**

2015

## **1. INTRODUCTION**

Leverate Financial Services Ltd (hereinafter, "the Company") is an Investment Firm regulated by the Cyprus Securities and Exchange Commission (hereinafter, "CySEC") with licence number 160/11.

The Client Complaint Policy (hereinafter, the "Policy") sets out the processes employed when dealing with complaints received from Clients.

A Client complaint is an expression of dissatisfaction by a Client regarding the provision of investment and/or ancillary services by the Company.

This Policy is an adjunct to the Company's overarching general obligation to act honestly, fairly and professionally and in the best interests of its Clients and to comply, in particular, with the principles set out in the above legislation when providing investment services and other ancillary services.

## **2. PROCEDURE**

A Client complaint form, available on the Company's website (<http://leverate.com/liquidity/client-disclosures>) is provided by the Client to the Compliance Department. The complaint is processed by the Compliance Officer whereby all information regarding the complaint is gathered in order to independently and impartially investigate it for reaching a fair outcome.

The following details have to be documented within the complaint:

- the identity of the Client who filed the complaint or grievance
- the identity of the employee that undertook to provide the service to the Client
- the department to which the relevant employee relates to
- the date of receipt of the complaint or grievance
- the details of the complaint or grievance ó full description
- the extent in financial terms of the potential loss that the Client claims has suffered
- the date and in summary, the content of the reply of the Company to the said complaint or grievance

## **3. RESOLVING CLIENTS COMPLAINTS OR GRIEVANCES**

Once a complaint is communicated to the Company, the Client will receive an acknowledgement receipt of the complaint by the Company's Compliance Officer immediately as long it is within working hours.

The Compliance Officer will review the complaint and ascertain the key issues of the Client's complaint and respond to the client within seven (7) working days.

The Compliance Officer will endeavour to send a final response to the Client within 4 weeks from the date of the receipt of the complaint. In case the aforesaid Officer is unable to provide the Client with a final response within this time frame, will address this to the Client explaining why and advise the Client on when can expect the receipt of the final response.

If more than 3 months, from the date of receipt of the complaint have past and the Client has not received a final response or the Client is not satisfied with the final response received, is entitled to refer his complaint to the Financial Ombudsman of the Republic of Cyprus, which can be contacted at the following:

Financial Ombudsman of the Republic of Cyprus

13 Lord Byron Avenue  
1096 Nicosia  
Cyprus  
P.O. BOX 25735, 1311 Nicosia

Tel: 22-848900

The complaint to the Financial Ombudsman is submitted within a specified period of 4 months from the date of receipt of the final response from the Company.

**4. CONTACTS**

Any questions regarding this Policy shall be addressed to [ifs@leverate.com](mailto:ifs@leverate.com).