

## CLIENTS COMPLAINTS PROCEDURE

<b>Effective as of:</b>	10.05.2023
<b>Approved by:</b>	Board of Directors
<b>Operational applicability:</b>	All Personnel and Clients
<b>Geographic applicability:</b>	Cyprus
<b>Next review date:</b>	10.05.2024
<b>Version:</b>	3

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## 1. INTRODUCTION

Boson Alfa Ltd (hereinafter referred to as the «Company» or «we»), with its office at 54 Vasileos Georgiou A Str., Galatex Beach Center, Block E2, Office 46 Potamos Germasogeias, 4047, Limassol, Cyprus is the Cyprus Investment Firm («CIF») authorized and regulated by the Cyprus Securities and Exchange Commission («CySEC») with license No.314/16.

Following the implementation of the Markets in Financial Instruments Directive (MiFID), and in accordance to the provisions of Circular no. CI144-2012-05 of 5th of March 2012 and Circular C100 of 7th of December 2015 issued by the Cyprus Securities and Exchange Commission, Boson Alfa Ltd was required to establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints received from Clients or potential Clients (hereinafter referred to as the «Client» or «you»), and to keep a record of each complaint and the measures taken for the complaint's resolution.

On January 3, 2018, the European Union's (EU's) Second Directive on Markets in Financial Instruments (MiFID II) entered into force with the main objective of strengthening investor protection and increasing transparency in financial markets (Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on Markets in Financial Instruments and Amending Directive 2002/92/EC and Directive 2011/61/EU (MiFID II), implemented in Cyprus by the Investment Services and Investment Activities and Regulated Markets Law 87(I)/2017 (New IS Law) .

## 2. OPERATIONAL PROCEDURE

The operational procedures of the Company for the handling of complaints received by the Company, as these are described in the Internal Operations Manual, indicate that the following information should be collected and recorded:

- a) date of receipt and of registration of the complaint;
- b) details of the Client that made the complaint;
- c) service/department to which the complaint relates to;
- d) details of the Company's employee responsible for the service/s rendered to the Client;
- e) content of the complaint, in brief;
- f) magnitude of the damage which the Client claims to have suffered or which can be presumed to have suffered on the basis of the contents of the complaint;
- g) date of the Company's answer;
- h) briefly, the content of the Company's written response to the complaint lodged;
- i) reference to any correspondence exchanged between the Company and the Client which should be attached to the Company's file.

## 3. PROCEDURES OF HANDLING CLIENTS COMPLAINTS

### 3.1. COMPLAINTS SUBMISSION

Clients can submit a complaint to the Company by using a specific form, the **CUSTOMER COMPLAINTS/SUGGESTION FORM** (Annex 1). In particular:

- a) The Client is kindly requested to dully complete the form providing all relevant requested information, sign and stamp (as applicable);
- b) The form can be sent to Boson Alfa Ltd
  - by email at [complaints@bosonalfa.com](mailto:complaints@bosonalfa.com) or
  - by fax to +357 25558224 or

- via post to our registered address 54 Vasileos Georgiou A Str., Galatex Beach Center, Block E2, Office 46, 4047, Potamos Germasogeias, Limassol, Cyprus, Attn: Complaints Handling Officer.

### 3.2. COMPLAINTS RECEIPT

Following receipt of the complaint by the Company the Client will receive a Complaints acknowledgement E-mail indicating the expected timeframe for investigation and resolution of the problem.

The Formal Complaint must only be forwarded to a dedicated email address which solely belongs to and accessed by the Company's Compliance Officer [complaints@bosonalfa.com](mailto:complaints@bosonalfa.com).

All Formal Complaints must be in writing, in the manner set forth above, for action in accordance with the procedures described below. Upon receipt of a Formal Client Complaint, written Acknowledgment will be sent to the Client by e-mail within **five (5) business days** from the date the Complaint was received notifying you also of your **Unique Reference Number (URN)** which must be used in all future contacts with the Company, the Financial Ombudsman and/or the CySEC regarding the specific complaint.

This Acknowledgement will confirm that we are taking the necessary action needed to resolve the Complaint, and will also provide an approximate timescale required in order to do so and will further state who within our Company is dealing with the Complaint and how to make contact with them (this will normally be the Compliance Officer).

The Company will investigate your complaint and will aim towards a final resolution of any issue/complaint/grievance and reply **within a maximum of two months (2 months)** period from the initial complain receipt in relation to the possible reasons that caused the issue at hand and the outcome/decision. During this period of time of the investigation of the complaint, the Company will inform/update you of the handling process. In the event that the Company is unable to respond within two months, you will be notified of the reasons for the delay and further indication will be provided on the period of time within which it is possible to complete the investigation. This period of time cannot exceed the three months **(3 months)** from the submission of your initial complaint.

Should the Client feel dissatisfied with the Company's assessment and the complaint relates to possible compensation claim, the Company would like to inform the Client that he/she has the right to refer the Complaint to The Financial Ombudsman of the Republic of Cyprus which is the competent body to examine compensation claims via an extrajudicial procedure.

Should the Client consider submitting such a complaint to the Financial Ombudsman in writing either by post or by e-mail, the contact details appear below:

#### **The Financial Ombudsman of the Republic of Cyprus**

Address: 13 Lord Byron Avenue, 1096 NICOSIA / Telephone: 22848900 (main number) / facsimile (Fax): +35722660584, 22660118

E-mail:

- Complaints: [complaints@financialombudsman.gov.cy](mailto:complaints@financialombudsman.gov.cy)
- Financial Ombudsman: [fin.ombudsman@financialombudsman.gov.cy](mailto:fin.ombudsman@financialombudsman.gov.cy)
- Official Website: [www.financialombudsman.gov.cy](http://www.financialombudsman.gov.cy)

### 4. 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.

## **5. MONITORING AND REVIEW**

The Client Complaints procedure will be reviewed and/or amended annually and/or as and when considered necessary by the Board of Directors of Boson Alfa Ltd.

The existing clients will be notified of any material changes or amendments to this Procedure which may be made from time to time. The latest version of the document will also be available at [www.bosonalfa.com](http://www.bosonalfa.com).

**ANNEX 1. SAMPLE OF COMPLAINTS FORM**

<b>CUSTOMER COMPLAINTS / SUGGESTION FORM</b>			
<p>You are kindly requested to duly complete this form providing all relevant requested information, sign and stamp it (as applicable).</p> <p>You can send it to the Company by email at <a href="mailto:complaints@bosonalfa.com">complaints@bosonalfa.com</a> or by fax to +357 25558224, or via post to our registered address 54 Vasileos Georgiou A Str., Galatex Beach Center, Block E2, Office 46, Potamos Germasogeias, 4047 Limassol, Cyprus, Attn: Complaints Handling Officer.</p> <p>Kindly note that additional information may be requested in order to further investigate and finally resolve the problem</p>			
<b>CLIENT INFORMATION</b>			
<b>Client Full Name</b>			
<b>ID / Internal or International Passport Number</b>			
<b>Country of Residence of the Complainant</b>		<b>E-mail Address</b>	
		<b>Phone Number</b>	
<b>Authorized Representative Full Name</b>			
<b>Complaint Date (DD/MM/YYYY)</b>			
<b>Specify the Department and/or Employee involved (if applicable/possible)</b>			
<b>Does your complaint involve a financial loss?</b>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
<b>IF "Yes" kindly provide the estimated amount of loss</b>			
<b>Preferred communication method</b>	Fax <input type="checkbox"/>	E-mail <input type="checkbox"/>	Telephone <input type="checkbox"/>

DESCRIPTION OF THE COMPLAINT	
<p><b>SIGNATURE</b></p> <p>If submitted via the email address used on the account opening form, no need to sign)</p> <p>If submitted via FAX or via post the form needs to be signed by the authorized person</p>	<b>Signature:</b>
	<b>Name of Signatory</b>
	<b>Date</b>
FOR INTERNAL USE (Do not write in this area)	
<b>Reference Number:</b> .....	<b>Date Received:</b> .....
<p><b>Disclaimer: the Complaints Handling Procedure established by Boson Alfa Ltd is based on the Directives, Circulars issued by the Cyprus Securities and Exchange Commission (CySEC) relating to the authorization and operations conditions of Cyprus Investment Firms (CIFs). Boson Alfa Ltd will handle each complaint submitted in the best interest of the client and ensure that each complaint will be recorded and filed in accordance to the relevant complaints handing procedures established by the CySEC procedures. Based on these procedures personal information of the complaints may be provided to the CySEC via the designated form designed by CySEC. Boson Alfa Ltd will not request your consent to submit your personal information.</b></p>	