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## Complaints procedure for clients

We, Key Way Investments Ltd (hereinafter, the “Company”), have adopted this Complaints Procedure in order to ensure a fair and quick process for handling complaints that may arise from our relationship.

Key Way Investments Ltd is authorized and regulated by the Cyprus Securities and Exchange Commission as a Cyprus Investment Firm (CIF License Number 292/16). Key Way Investments Ltd is registered in Cyprus under the Companies Law, with registration number HE 341196. Its registered office is at 18 Spyrou Kyprianou Avenue, Suite 101, Nicosia 1075, Cyprus.

### 1. Submitting your Complaint

You may submit your complaint in writing and addressed to the Complaints Management Function of the Company who is authorized to handle and investigate complaints that may be submitted to them from our Clients.

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

- a. By sending by post or delivering in person the attached Complaints Form at the following address: 18 Spyrou Kyprianou Avenue, Suite 101, Nicosia 1075, Cyprus.
- b. By submitting the Complaints Form electronically at the following email address: [complaints@keywayinvestments.com](mailto:complaints@keywayinvestments.com)
- c. By Facsimile at +357 22 496 642.

### 2. Acknowledging your Complaint

We will acknowledge receipt of your complaint within five (5) days from the receipt of your complaint and provide you the unique reference number of your complaint. The unique reference number should be used in all your future contact with the Company, the Financial Ombudsman and/or CySEC regarding the specific complaint.

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### 3. Handling of your Complaint

Once we acknowledge 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 will keep you updated on the handling process of your complaint. One of our officers may contact you directly (including communication by email or phone) in order to obtain, where needed, further clarifications and information relating to 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 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.

Please note that the Company shall consider your complaint as closed and cease the relevant investigation in case you fail to respond to our officers within the period of three (3) months from the date of the submission of your complaint or from the date of your latest communication with the Company, whichever date is later, and due to this, the investigation cannot be carried forward. We will require your full cooperation in order to expedite the investigation and possible resolution of your complaint.

### 4. Final Decision

When we reach an outcome, we will inform you of it together with an explanation of our position and any remedial measures we intend to take (if applicable).

- 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:** +35722660584, +35722660118

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If you are not satisfied with the Company's final decision you may submit your complaint to 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.

However, in order for the Company to take its final decision regarding the complaint, at least the following information should be provided by the complainant:

- **Name of the Complainant**
- The email the Complainant used to register with the Company (**Registered Email**)
- The number of the Complainant's Trading Account which the complaint refers to (**Account No.**)
- A summary of the Complaint
- The amount that the Complainant claims (**Disputed Amount**)

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## COMPLAINTS FORM

This is the form you need to fill in if you wish to submit your complaint to Key Way Investments Ltd (the “Company”). Complete, up to date as well as accurate information is required to be provided to the Company for the proper investigation and evaluation of your complaint.

Please note that the below Complaint Form is only indicative and not exhaustive. The Company may request further information and/or clarifications and/or evidence as regards to your complaint.

Date:

### **Client information**

Name:

Surname:

ID or Passport Number:

Legal Entity Name

*(In case the Client is a legal person)*

Country of Nationality *(in case of Natural Person)* **or** Incorporation Country *(In case of Legal Person)*

Registered Email:

Account Trading Number:

### **Contact details of the client**

Postal Address:

City/Province:

Code:

Country:

Telephone Number:

Email:

*(Please advise your most convenient method of communication)*

**Details of the complaint**

Date when the Complaint was created:

Description of the Complaint:  
*(use a separate sheet if necessary)*

Disputed/Claimed Amount (currency & amount):