



COMPLAINTS HANDLING POLICY

OEXN Limited is a duly licensed and regulated entity registered in the Republic of Cyprus (“**Company**”) and authorized by the Cyprus Securities and Exchange Commission (“**Cysec**”) as per the Provisions of the Investment Services, the Exercise of Investment Activities, the Operation of Regulated Markets and Other Related Matters Law of 2017, as amended from time to time, to provide one or more investment services to third parties and/or perform one or more investment activities in accordance with its Cyprus Investment Firm (“**CIF**”) license number [].

The Company defines the “*complaint*” as a statement of dissatisfaction addressed to the Company by a complainant relating to the provision of investment services and the “*complainant*” as any person, natural or legal, which is eligible for lodging a complaint to the Company and who has already lodged a complaint.

The Company is highly committed to providing the highest standard of service to all Clients on every occasion. Pursuant to the Directive DI144-2007-01 of 2012 and relevant Cysec Circulars (C100, C198 and C338) in relation to the authorization and operating conditions of a CIF, a CIF is required to establish, implement and maintain effective and transparent procedures for the reasonable and swift handling of complaints or grievances received from retail or potential retail clients, and to keep a record of each complaint or grievance and the measures taken for the complaint’s resolution.

1. Procedure

The Client is informed at the account opening process, by email or via the Website of the Company’s “Complaints Policy”.

a. How to file a Complaint:

- i. Complaints can be submitted to the Company, either in the form of letter, fax or email to complaints@oexn.com
- ii. In event that a Complainant is dissatisfied with a response that the Company provided them with, they may escalate the complaint to the Compliance Department. Complainants shall provide the following details when submitting their complaints to the Company:
 1. Client’s name and surname
 2. Client’s trading account number
 3. Identification numbers of the relevant orders and positions (if applicable)
 4. Date that the issue arose and the description of the issue
 5. Capital and the value of the Financial Instruments which belong to the client
 6. Reference to any correspondence exchanged between the Company and the client
- iii. Complainants who wish to post their complaint in the form of letter, shall send their complaints to: 1 Kalimnou Str. Office 602, 6037, Larnaca, Cyprus which is the business address of the Company.

b. Complaints Procedure

- i. The Complainant shall receive a formal written acknowledgment within 5 (five) Business Days from when the Company received the Complaint.
- ii. The Company shall register the complaint directly to an internal register, giving it a unique reference number, which will then be sent to the Client (who will need to use that number for all further communications regarding the subject complaint)
- iii. A complaint received on any day other than a Business Day, or after close of business on a Business Day, may be treated as received on the next Business Day
- iv. The Complaint will be investigated and where it cannot be immediately resolved, it will be escalated to the Compliance Department of the Company for further review
- v. The Complainant shall be informed about the results of the investigation immediately upon its completion
- vi. In the event that the issue cannot be resolved within the specified period due to the complicated nature of the complaint, or further clarification of circumstances is required, the complainant shall be contacted



- vii. In the event that the Compliance Department is unable to respond within 2 (two) months, it will inform the Complainant of the reasons for the subject delay and it will indicate the period of time that it will take to complete the investigation. All Complaints must be responded to within a maximum of 3 (three) months from the date of receiving the Complaint initially
 - viii. A Complaint is resolved where the Complainant has indicated acceptance of a response from the respondent, with the response or acceptance having to be in writing.
 - ix. The Complainant, if not satisfied with the Company's decision on final resolution of the Complaint, may approach the Financial Ombudsman of the Republic of Cyprus and/or the Cysec, using the assigned unique reference number [section 1(b)(ii)] provided by the Company and/or the competent Courts.
- c. It shall be noted that the Company has the ultimate right to refrain from reviewing a complaint when any one of the following circumstances occur:
- i. The Complaint does not comply significantly with the format requirements as outlined in section 3.1 above
 - ii. It does not identify the applicant's identity
 - iii. It includes offensive and/or abusive language directed either to the Company or to an employee (or officer, of affiliate or agent) of the Company

In such cases, notification shall be provided to the Client.

2. Record Keeping

The Company's Compliance Department shall and will maintain all received Complaints for a minimum period of 5 (five) years.

3. Financial Ombudsman

- a. If the Complainant remains unsatisfied with the Company's best efforts to settle the Complaint, Complainants have the right to escalate the Complaint to the Financial Ombudsman of the Republic of Cyprus, which mainly deals with unresolved Complaints from eligible clients. Complainants shall refer their Complaints to the Financial Ombudsman within 6 (six) months of the date of the final response letter received from the Company.
- b. Kindly note that in the event that the Complainant does not refer their Complaint in time, the Financial Ombudsman of the Republic of Cyprus will not have the Company's permission to consider the subject complaint and so will only be able to do so in very limited circumstances (i.e. if the Financial Ombudsman reasonably believes that the delay was as a result of exceptional circumstances).

Contact details for the Financial Ombudsman of the Republic of Cyprus:

Tel: +357 22 84 89 00

Email: complaints@financialombudsman.gov.cy

Address: 13, Lord Byron Avenue, 1096, Nicosia, Cyprus

Website: http://www.financialombudsman.gov.cy/forc/forc.nsf/index_gr/index_gr?opendocument