

COMPLAINTS HANDLING PROCEDURE

Trust Capital TC Ltd (hereinafter the “**Company**”) is a Cyprus Investment Firm authorized and regulated by the Cyprus Securities and Exchange Commission (hereinafter “**CySEC**”) under license number 369/18, incorporated under Cyprus Company Law with Company Registration Number: HE 364353 and with registered office at 23 Olympion Street, Libra Tower, Second Floor Office 202, 3035 Limassol, Cyprus.

In accordance with the Investment Services and Activities and Regulated Markets Law of 2017 as subsequently amended from time to time (hereinafter the “**Law**”) and Markets in Financial Instruments Directive “MiFiD II” the Company has established effective and transparent procedures for the reasonable and prompt handling of complaints received from complainants and keeps records of each complaint as well as the actions taken to remedy the situation.

1. Definitions

“Complaint” means a statement of dissatisfaction addressed to the Company by a person, natural or legal person hereinafter the “person” who is presumed to be eligible to have a complaint considered by the Company and who has already lodged a complaint (hereinafter the “**Complainant**”) relating to the provision of investment services.

2. Queries

If you are dissatisfied with our services, or if you have a query regarding your account or activity with us, you may contact the Customer Support Department via live chat, e-mail or telephone. Our Customer Support Department will determine if your query can be resolved immediately or if it will require further investigation. If your query cannot be resolved immediately, we remain committed in addressing and/or resolving it in a prompt manner (usually within 48 business hours).

If you are not satisfied with the response to the query or the grievance you received, then you may raise this further with the Compliance Department following the process indicated in the ‘Submission of a Complaint’ section.

3. Submission of a Complaint

Clients may submit their complaints or grievances to the Company in writing, using the “Complaint Form” attached in Appendix 1. A complaint may be submitted to the Company by the following means:

- I. To the Compliance Department through email at compliance@trustcapitaltc.com. or
- II. By registered post at the Company’s Headquarters

In the event the Company receives a notice through the lines of communication that are used by the Company for the reception of complaints, but in the event that such notice does not fall within the definition of 'complaint' above and can be characterized as an enquiry; this shall be categorized as an enquiry rather than a complaint and the person will be informed accordingly, such enquiry will be forwarded to the relevant department to be handled accordingly. The person maintains the right to request for the re-classification of his enquiry as a complaint.

4. Procedure and Required Details

The Compliance Department is responsible for collecting, assessing and handling Clients' complaints. The Client shall include the following information in their complaint:

- Client name (first name and last name)
- Account number
- Complainant's Address
- Complaint Description

The Client shall also include any additional information requested by the Complaints Form and shall also provide to the Company promptly any information that the Company might ask that will assist the Company to better investigate and resolve the client's complaint.

5. Handling of Complaints

Any complaint received by the complainants shall be efficiently handled by the Compliance Department.

The Compliance Department shall follow the below procedure steps when handling complaints:

- a) Once the complainant files a complaint, an electronic acknowledgement of receipt will be sent to the email address of the complainant within 5 working days to acknowledge that the Company has received the complaint and is currently working on a resolution. The Company should also provide to the complainant via the same email a unique reference number of the complaint for future reference.
- b) Following the examination and the reaching of a decision by the Company of the complaint, the latter shall reply to the complainant within two months from the acknowledgement of the Complaint by the Company with the remedial actions to be taken or provide further clarifications, and the reasoning behind the Company's decision, as applicable.
- c) In the event that the Company is unable to respond within two months, it informs the complainant of the reasons for the delay and indicates the period of time within it is possible to complete the investigation, such period shall not exceed three months from the acknowledgement of the Complaint.
- d) The Complaint shall be documented by the Company and the Company shall keep in its records the following information:
 - I. the identity of the complainant who filed the complaint
 - II. the name of the employee who undertook to provide the service to the complainant
 - III. the date of receipt of complaint/enquiry
 - IV. the subject and full description of the complaint/enquiry
 - V. the remedial action taken, and/ or further clarifications provided to the complainant

6. Record Keeping and Reporting Obligations

Any complaints related decisions shall be provided to complainants in writing (this shall be by e-mail) and the Compliance Department shall retain copies of the aforesaid decisions. Such documentations shall be maintained for a period of at least five (5) years to be calculated after the Company's final decision of the complaint and/or the termination of the business relationship with the Client/Complainant.

7. Next Steps

In the event the complainant's demands are not satisfied by the Company's final decision, the latter may escalate the complaint through the Financial Ombudsman of the Republic of Cyprus hereinafter the "Financial Ombudsman", Cyprus District Courts or CySEC.

In the event the complainant decide to contact the Financial Ombudsman such contact must take place within a period of four (4) months from the date that the complainant received our final response, please note that the Financial Ombudsman has the right to refuse the examination of any complaint if, amongst other reasons, that complaint has been submitted to the Financial Ombudsman fifteen (15) months from the date on which the Client has become aware, or ought to reasonably be aware (according to the opinion of the Financial Ombudsman) of the action or omission of the financial undertaking or of the fact that he had a basis for the submission of a complaint.

Please note that if a client is a legal entity, trust or otherwise, different provisions may apply, and you should become aware of the provisions of the relevant law.

Further information can be found at www.financialombudsman.gov.cy.

Further information as to the procedure you need to follow can be found on <http://www.cysec.gov.cy/en-GB/complaints/how-to-complain/>

When complaining, the complainant should, at all times, use the unique reference number that will be provided in the acknowledgement and/ or response by the Company.

It should be noted that CySEC has no restitution powers. Any disputes, for which damages are claimed, should be submitted to the Financial Ombudsman.

If you are not satisfied by the Financial Ombudsman decision you may seek take civil action as an option of last resort.

**Appendix 1
 Complaints Handling Form**

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| Client Name: | |
| Account Number: | |
| Address: | |
| Brief Description: | |
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| | |

Date:

Signature:

Please enclose any evidence and relevant documentation.
 Submit the form to compliance@trustcapitaltc.com or fax at +357 25 388577

 Internal Use Only

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|-------------------------------------|--|------------------|--|
| Employee handling the complaint | | | |
| Date of Receipt | | Date of Response | |
| Result and Date of Final Resolution | | | |
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