



**BROKERAGE  
HOUSE**

**Wise Wolves Finance**



## **Complaints management policy**

### **Purpose**

Wise Wolves Finance Limited is required to establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints or grievances received from retail clients or potential retail clients, and to keep a record of each complaint or grievance and the measures taken for the complaint's resolution.

This policy is established in order to provide the highest quality of the service to all clients and in order to ensure a fair and quick process for handling complaints that may arise from our relationship.

### **Definitions**

«Complainant» means any person, natural or legal, which is eligible for lodging a complaint to Wise Wolves Finance Ltd and who has already lodged a complaint.

«Complaint» means a statement of dissatisfaction addressed to Wise Wolves Finance Ltd by a complainant relating to the provision of investment services.

### **Core principals**

When the client/potential client/counterparty is not satisfied with the quality of service provided by Wise Wolves Finance Limited, (s)he has the right to complain.

Any Client and/or potential client and/or counterparty can submit a complaint to Wise Wolves Finance Limited free of charge.

The Complaint may be submitted by post, fax, e-mail, delivering in person and/or web-site of Wise Wolves Finance Limited.

The provision of Complaints Handling Procedure of Wise Wolves Finance Limited may be provided as per request free of charge as well as may be found on the Wise Wolves Finance Limited web-site.

The Complaints should be recorded and shall be never deleted.

No clients/counterparties could be disadvantaged as a result of making a complaint.

The Complaints management policy is also included in Wise Wolves Finance Limited internal operational manual.

The Complaints management policy is available to all relevant staff of the firm through adequate internal channels of communication.

The Complaints management policy with the details of complaints-handling process is published in an easily accessible manner, e.g. via Wise Wolves Finance Limited website <https://wise-wolves.finance/>

The board of directors and senior management are responsible for the implementation and for monitoring Wise Wolves Finance Limited compliance with the Complaints management policy.

Wise Wolves Finance Limited has established a Complaints Committee, that is also responsible for reviewing the Complaints handling process, advising the Board of Directors the necessary amendments to the Complaints management policy, reviewing the complaints and ensures that complaints are investigated fairly, and possible conflicts of interest are identified and mitigated.

The Complaints Committee is represented by the Executive Director, Non-Executive Director, Head of Compliance and Risk Manager of the Wise Wolves Finance Limited.

All complaints Wise Wolves Finance Limited receives, it registers on an internal archive, as quickly as possible, and in an appropriate manner.

Wise Wolves Finance Limited provides the Commission, in electronic form, information regarding the complaints it receives and how these are being handled.

Wise Wolves Finance Limited will analyze, on an on-going basis, complaints handling data, to ensure that they identify and address



any recurring or systemic problems, and potential legal and operational risks, for example by:

- a. Analyzing the causes of individual complaints to identify root causes common to types of complaints,
- b. Considering whether such root causes also affect other processes or financial means, including those not directly complained of; and
- c. Correcting, where reasonable to do so, such root causes.

If the Complainant is not satisfied how the complaint is handled by Wise Wolves Finance Limited.

#### **Complaints Handling Process**

The following information should be provided by the complainant for lodging a complaint:

- 1) Complainant Name
- 2) Complainant Surname
- 3) Identification Number
- 4) Contact details (phone, e-mail, address, country)
- 5) Description of the issue
- 6) Sum of money involved (where applicable)
- 7) Department or organizational unit and/or details of employee who provided service to the complainant
- 8) Date

The Complaint should be submitted or via the Complaint Form (Appendix A) or via I

The following information will be provided to the Complainant:

- 1) Unique Reference Number of the Complaint that should be used in all your future contact with the Company, the Financial Ombudsman and/or Cyprus Securities and Exchange Commission regarding the specific complaint
- 2) Written information regarding the complaints-handling process or the link to the source where the written information regarding the complaints-handling process could be read (e.g. link to the website of Wise Wolves Finance Ltd where the Complaints-handling process is published)
- 3) The acknowledgment of the receipt of the Complaint that will be sent to the Complainant within 5 working dates from the date of the receipt of the Complaint
- 4) The identity and contact details of the person or department to whom the complaint is directed
- 5) The indicative handling time
- 6) The availability (where applicable) to contact the Commission, the Financial Ombudsman or ADR mechanism or the relevant Courts.

Wise Wolves Finance Ltd when receives a complaint will:

- 1) Keep the complainant informed about further handling of the complaint
- 2) Gather and investigate all relevant evidence and information regarding the complaint
- 3) Review the complaint carefully, investigate the circumstances surrounding the complaint
- 4) Communicate in plain language which is clearly understood.
- 5) Provide a response without any unnecessary delay.





- 6) When an answer cannot be provided within the expected time limits, it should inform the complainant about the causes of the delay and indicate when Wise Wolves Finance Ltd investigation is likely to be completed.
- 7) Make every effort to investigate the complaint and provide with the outcome of the investigation within 4 weeks from the date the complaint is submitted to Wise Wolves Finance Ltd.
- 8) In the event that the complaint requires further investigation and Wise Wolves Finance Ltd cannot resolve it within 4 weeks, Wise Wolves Finance Ltd 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, Wise Wolves Finance Ltd shall provide the Complainant 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 the cooperation between the Complainant and Wise Wolves Finance Ltd.
- 9) When providing a final decision that does not fully satisfy the complainant's demands, to notify in writing the complainant using a thorough explanation of its position on the complaint and set out the complainant's option to maintain the complaint e.g. through the Commission, the Financial Ombudsman, ADR Mechanism, or the relevant Courts

The employee, who receives the Complaint, shall ensure that all the core details are provided. If any information is pending, the receiver of the complaint shall contact the Complainant and request the relevant details.

The Complainant may always contact Wise Wolves Finance Ltd as follows:

- 1) Phone +357 25 366 336
- 2) Fax +357 25 355 233
- 3) E-mail [wwf@wise-wolves.com](mailto:wwf@wise-wolves.com)
- 4) At the registered address: 30B Gladstonos Street, Country Rose Building, 3041, Limassol, Cyprus

Contact Details of the Financial Ombudsman of the Republic of Cyprus:

Website: <http://www.financialombudsman.gov.cy>

Telephone: +357 22 848 900

Fax: +357 22 660 584, +357 22 660 118

Email: [complaints@financialombudsman.gov.cy](mailto:complaints@financialombudsman.gov.cy)

Postal Address: P.O. BOX: 25735, 1311 Nicosia, Cyprus

It is important that the Complainant contacts 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 the complaint.

Contact Details of the Cyprus Securities and Exchange Commission:

Website: <http://www.cysec.gov.cy>

Telephone: +357 22 506 600

Fax: +357 22 506 700

General email: [info@cysec.gov.cy](mailto:info@cysec.gov.cy)

Postal Address: P.O. BOX 24996, 1306 Nicosia, Cyprus

The Cyprus Securities and Exchange Commission does not have restitution powers and therefore does not investigate individual



complaints.

### **Record Keeping**

Wise Wolves Finance Ltd maintains register of the complaints (Appendix B) and keeps the records of all complaints and notes, communication regarding complaints, responses to complainants and submission of all the reports regarding the complaints to the Cyprus Securities and Exchange Commission.

### **Reporting to Cyprus Securities and Exchange Commission**

Wise Wolves Finance Ltd upon receiving the complaint, must register the complaint directly to an internal register, giving it a unique reference number.

The unique reference number must be consisted of ten digits:

- i. the first two digits are the code of Wise Wolves Finance Ltd regarding the Transaction Reporting System, the following four digits define the year, and the last four digits denote the number of each complaint serial number
- ii. The unique reference number is communicated to the complainant.
- iii. Wise Wolves Finance Ltd informs the complainant that he should use the said reference number in all future contact with the CIF, the Financial Ombudsman and/or the CySEC regarding the specific complaint

Every month, Wise Wolves Finance Ltd provides to the CySEC information regarding the complaints it receives and how these are being handled and completes every month (reporting month) the form XX\_yyyymmdd\_T144-002-01 and sends it to the CySEC within five days after the reporting month.



**COMPLAINTS FORM**

This is the form the Complainant needs to fill in in order to submit the complaint to WISE WOLVES FINANCE 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 the complaint.

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

**DATE:****CLIENT INFORMATION**

Name:

Surname:

ID or Passport Number:

Country of nationality:

Legal Entity Name (in case the Client is a legal person):

Account Number:

**CONTACT DETAILS OF THE CLIENT**

Postal Address:

City/Province:

Code:

Country:

Telephone Number:

Email:

**DETAILS OF THE COMPLAINT**

Date when the Complaint was created:

Employee who offered the services to the Client (if applicable):

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

☐ I hereby certify and confirm that to the best of my knowledge, the information furnished above is true, accurate, correct and complete.

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For Official Use Only

Received on:	Assigned to:
Received by:	Signature

## APPENDIX B

## Internal Register

Complaint Number	Unique Reference Number	Complainant Name	Complainant Name	Identification document	Number of identification document	Complainant E-mail	Complainant Country	The service to which the complaint refers to	Details of the employee who provided service to the customer
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Department or organizational unit to which the employee refers to	Detail of Complaint	Sum of money involved	Potential loss that the customer claims he/she has suffered or as it is derived from the content of the complaint	Complaint Date	Time and Date of Receipt of the Complaint	Name and position of Employee who received complaint	Date and Time Compliance is informed of the Complaint	Actions taken by the Company

Date the Company confirms the receipt of the Complain of the Complainant	Was the Client informed about the Complaint's Handling Process	Date of Final Response to Client	The Company sent the Final response within 4 weeks (Yes/No)	If no, reasons of delay	Investigation is concluded during 8 weeks (Yes/No)