



WWF Clients' Complaints Policy

Purpose

Wise Wolves Finance Ltd (hereinafter referred to as the “**Company**” or “**WWF**”) is a financial services Company incorporated and registered under the laws of the Republic of Cyprus with Registration No. HE361580, having its registered office at 61, Spyrou Kyprianou, 4003 Limassol, Cyprus. The Company has been granted a license from the Cyprus Securities and Exchange Commission (hereinafter referred to as the “**CySEC**”) to act as a Cypriot Investment Firm (CIF) (license No. 337/17) and operates under the Law (L. 87(I)/2017) which provides for the provision of investment services, the exercise of investment advice, the operation of regulated markets and other related matters (hereinafter referred to as the “**Law**”) which has implemented the Markets in Financial Instruments Directive (EU Directive 2014/65/EU).

The Company 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

“Complaint” shall mean a statement of dissatisfaction addressed to a firm by a natural or legal person (a client) relating to the provision of an investment and/or ancillary service provided under MiFID by the Company. It must be written and made in the English Language by using the relevant form published within the Company's official website, namely the **‘Client Complaint Reporting Form’** (please see **Appendix 1** below herein).

“Complainant” shall mean a natural or legal person (a Company client) who is presumed to be eligible to have a complaint considered by a firm and who has already lodged a complaint.

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 either post, fax, e-mail, delivered in person and/or web-site of Wise Wolves Finance Limited.

The Company's Client's Complaints 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, Senior Management and Compliance Department of the Company are responsible for the implementation and for monitoring Wise Wolves Finance Limited compliance with the Client's Complaints Policy.

All complaints Wise Wolves Finance Limited receives, are registered on an internal book register, as quickly as possible, and in an appropriate manner.

Wise Wolves Finance Limited provides CySEC, 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, in accordance with the Company's internal Complaints Handling Process, to ensure that the Company identifies and addresses any recurring and/or systemic problems, and/or any potential legal and/or 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.

Complaints Handling Process

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

- 1) Date of receipt and of registration of the complaint;
- 2) Details of the client that made the complaint;
- 3) ID/Passport Number;
- 4) Country of Residence of the Complainant;
- 5) Service/department to which the complaint relates to;
- 6) Details of the Company's employee responsible for the service/s rendered to the client;
- 7) Content of the complaint;
- 8) Complaint cause;
- 9) Financial instrument involved – where and if applicable;
- 10) Disputed amount – where and if applicable on the services provided;
- 11) Settlement date – where and if applicable on the services provided;
- 12) 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 – where and if applicable on the services provided.

The Complaint should always be submitted via the Client Complaint Reporting Form, providing all relevant and applicable information and/or in the case of the use of the hard-copy form duly execute the form as applicable.

The Form must be sent to the Company's CS Department either via email to complaints@wise-wolves.com or by fax to +357 25 355 233. Should you wish to forward the Form via post, you may do so by sending the Form to the Company's registered address, FAO Customer Support Department, Wise Wolves Finance Ltd 61, Spyrou Kyprianou, 4003 Limassol, Cyprus.

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 complaints@wise-wolves.com
- 4) At the registered address: 61, Spyrou Kyprianou, 4003 Limassol, Cyprus
- 5) Website: www.wise-wolves.finance

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

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

Telephone: +357 22 848 900 (main number)

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

Email: Complaints: complaints@financialombudsman.gov.cy

Financial Ombudsman: fin.ombudsman@financialombudsman.gov.cy

Postal Address: 13 Lord Byron Avenue, 1096, Nicosia, Republic of Cyprus, 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.

Professional Clients

Complaints received from professional clients and eligible counterparties will be handled in the same way as all complaints received from retail clients or well-informed clients. However, professional clients and eligible counterparties may not have access to the Financial Ombudsman Service due to the nature of their knowledge and experience being classified as professional clients or eligible counterparties.

Contact Details of the **Cyprus Securities and Exchange Commission**:

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

Telephone: +357 22 506 600 (main number)

Fax: +357 22 506 700

General email: info@cysec.gov.cy

Postal Address: 27 Diagorou Str. CY-1097 Nicosia, P.O. BOX 24996, 1306 Nicosia, Cyprus

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

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

Record Keeping

Wise Wolves Finance Ltd shall maintain a record of all complaints and related details for a minimum period of **five (5)** years following the termination/resolve of a business relationship and in accordance with applicable legislative requirements.

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.

Annual Review/Update of this Policy

The Company reserves the right to amend its policies at any time by making them public on its official website. Policies shall be reviewed/amended annually and/or as and when it is deemed necessary by Regulatory Authorities and the Compliance Officer and further approved by the Board of Directors. If the Company materially changes this Policy, including how it collects, processes or uses clients' personal information, the revised Complaints Policy will be uploaded on the Company's official website. In such a case, the latest version of the policy published on the official website of the Company shall prevail. As such, Clients hereby consent, agree and accept that, posting of a revised Complaints Policy electronically on the Company's official website forms the actual notice of the Company to its Clients. The Company encourages its clients to periodically review this Complaints Policy so that they are always aware of what information the Company collects, how it uses it and to whom it may disclose it, in accordance with the provisions of this Policy. Any dispute over the Company's Complaints Policy is subject to this notice and the Client Agreement. Please contact us at complaints@wise-wolves.com should you require additional clarification and/or further information, inquiries and/or questions.

CLIENT COMPLAINT REPORTING FORM

This is the form the Complainant needs to fill in in order to submit the complaint to WISE WOLVES FINANCE LTD (hereinafter referred to as 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.

Instructions to Client

You are kindly requested to duly complete the information requested below herein the Client Complaint Reporting Form, providing all relevant and applicable information and/or in the case of the use of the hard-copy form duly execute the form as applicable. The Form must be sent to the Company's CS Department either via email to complaints@wise-wolves.com or by fax to +357 25 355 233. Should the Client wish to forward the Form via post to the Company's registered address, he/she may do so, by forwarding the Form to the Company's registered address at FAO Customer Support Department, Wise Wolves Finance Ltd 61, Spyrou Kyprianou, 4003 Limassol, Cyprus.

COMPLAINT DATE: / / (DD/MM/YYYY)

CLIENT INFORMATION

Full Name:

Surname:

Patronymic (if and where applicable):

ID/Internal or International Passport Number:

Country of Residence:

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:

KINDLY PROVIDE DETAILS OF THE COMPLAINT:

Does your complaint involve a financial loss? Yes ☐ No ☐

If your answer above is “Yes” kindly provide the estimated amount of loss: Department and/or Employee involved and/or who offered the services to the Client (if applicable):

Complaint Cause - Please choose one or more of the following:

☐ Reception & Transmission of Order(s) (RTO) (e.g., delay, wrong price etc.);

☐ Execution of Order(s) (e.g., delay in execution, re-quotes, slippage, erroneous trades etc.);

☐ Portfolio Management;

☐ Investment Advice;

☐ Quality or lack of information provided to the client;

☐ Terms of contract/fees/charges (including withdrawal problems, cancelation of profits etc.);

☐ General administration/customer services (including custody/safekeeping services where applicable);

☐ Unauthorised business being offered or carried out;

☐ Other (please specify in comments section below). The 'other' option should only be used after ensuring that the Complaint Cause does not fall under any of the above categories. If this option is used, then a short and detailed description is expected in the 'Complaint Cause Comments' below

Complaint Cause Comments - Should only be used if 'other' category was selected as a complaint cause

Financial Instruments – Please choose one of the following categories:

☐ Shares/ADR/GDR

☐ Options

☐ Other derivatives

☐ Bonds

☐ Structured Products

☐ Funds/ETFs

☐ Forward / Swaps

☐ Spot FX

☐ ETD (Exchange traded derivatives)

☐ All Fis offered by WWF

☐ Other investment products/funds (**please specify in comments section below**). The 'other' option should only be used after ensuring that the Financial Instrument does not fall under any of the above categories. If this option is used, then a short and detailed description is expected in the 'Financial Instruments Comments'.

Financial Instruments / Comments

Disputed Amount - Amount should be provided in Euros (no decimals) Yes ☐ No ☐ (If yes, please specify)

Full Date: _____

Signature: _____

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

Important Notes:

- Upon receipt of this form, a written acknowledgment e-mail will be sent to you within the next **five (5) working/business days**.
- This acknowledgement e-mail will further notify you also of your **Unique Reference Number (URN)** which must be used in all future contact with the Company, the Financial Ombudsman and/or the CySEC regarding the specific complaint.
- 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 (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 regular intervals.
- 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 cannot exceed **three (3) months** from the submission of your initial complaint.
- Should you feel dissatisfied with our assessment and your complaint relates to possible compensation claim, we would like to inform you that you have 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. Further information can be found within our Complaints Policy published within our official website at www.wise-wolves.finance.

For Official Use Only

Received on:	Assigned to:
Received by:	Signature
