

Complaint Handling Policy

1. Introduction

HOLIWAY INVESTMENTS LTD (hereinafter the “**Company**”) is an investment firm that is established in the Republic of Cyprus and is authorized by the Cyprus Securities and Exchange Commission (the “**CySEC**”) pursuant to the Law 144(I)/2007, 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**”) authorization under CIF Number 248/14.

The Company classifies a complaint as any grievance/ dissatisfaction involving the activities of those persons under the control of the Company (Employees), in connection with the provision by the Company of the investment and/or ancillary services it provides.

The target of the Company is to deliver a consistent, high-quality and accountable response to the complainant.

2. Legal Framework

In accordance with Directive DI144-2007-01 of 2012 and Circulars C100 and C198 regarding the authorization and operating conditions of CIF, a CIF is required to establish, implement and maintain effective and transparent procedures for the reasonable and prompt 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.

2.1 Definitions:

A “Complaint” is a statement of dissatisfaction formally addressed by the Client to the Company regarding the provision of investment and/ or ancillary services provided by the Company.

A “Complainant” is any client which is eligible for lodging a complaint.

2.2 Scope:

The procedure sets out the method for the submission of complaints with the Company when dealing with complaints received by the clients. The purpose of the Complaint Handling Policy outlines the procedures that are implemented when handling client complaints.

3. Procedure for Handling Client Complaints

3.1 How to file a Complaint:

The Complainant/ Client are able to file a complaint to the Company by sending a written complaint to the Company’s email (complaints@hwfx.com) or by downloading and completing the Complaint Form please click [here](#). All complaints must be in writing and shall be addressed, in the first instance, to the [*Customer Support Department*]. Where the Client receives a response, which does not satisfy him/ her, he/ she has the right to ask Support to escalate the complaint to the [*Compliance Department*]. The clients shall provide the following details when submitting their complaints via email or via the complaint Form:

- E-mail to [complaints@hwfx.com].
- The client’s name and surname.
- The clients trading account number.
- The identification numbers of the relevant orders and positions (if applicable).
- The date that the issue arose and the description of the issue.

- The magnitude of the damage claimed by the client.
- The capital and the value of the financial instruments which belongs to the client.
- Reference of any correspondent exchanged between the Company and the client.

3.2 Handling Complaints:

- Upon receipt of the complaint the Client shall receive a formal written acknowledgement within five (5) business days by the Back Office/Account Opening Department. The client will receive an email advising that the complaint has been received and it is under investigation.
- 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.
- The complaint will be investigated and if deemed necessary it will be escalated to the Compliance department where the complaint is addressed to be further verified and investigated.
- The Company sets 5 business days from the day the original complaint is received as a standard investigation period. If the investigation is complete in less than 10 business days, the complainant will be informed about the results of the investigation immediately upon its completion. However, if a complaint is not resolved within the standard investigation period, the Company shall inform the complainant in details about causes of delay, the status of the investigation process and the expected date of completion of the investigation.
- The events leading to the complaint or grievance and all the information provided by the client, will be examined and assessed in order to reach a fair outcome.
- The client will be informed at all the times by the CIF in regards to the handling process of his/her complaint. In particular, the findings and proposed solutions that shall be clearly explained in written form to the client within the agreed time frame.
- If an 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 notified of the new timeframes of response for the complaint. Which shall not exceed the three (3) months in line with Circulars C100 and C198.
- In the event that the Compliance Department (CIF) 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. This period of time cannot exceed three months from the submission of the complaint.
- The Complainant/ Client, if not satisfied with the resolution of the Complaint, may approach the Financial Ombudsman of the Republic of Cyprus and/ or the CySEC, using the assigned unique reference number provided by the Company and/or the relevant Courts.
- The Company has the right to refrain from reviewing a complaint when:
 - The complaint does not comply significantly with the format requirements as outlined in Section 3.1 above;
 - It does not enable to identify the applicant's identity;
 - It includes offensive language directed either to the Company or an employee of the Company.

In such case, the Client will be notified with the reasoning of why the complaint was not taken into process.

4. Record Keeping

The Company shall maintain all complaints for a minimum period of five (5) years, by the [Compliance Department.]

5. Review of the Complaints Handling Process

This Policy will be reviewed and/ or amended at annually or as when considered necessary by the board or when changes or amendments to operating requirements are issued by the Commission.