

Renaissance Capital

RENAISSANCE CAPITAL

COMPLAINTS HANDLING POLICY

Effective 3 January 2018

1. Complaints Handling Policy - Introduction

This Complaints Handling Policy (the “Policy”) is intended to provide clients with information relating to the complaint handling arrangements that Renaissance Securities (Cyprus) Limited (“RESEC” or the “Company”) and the wider Renaissance Capital group of companies (“Renaissance Capital” or the “Firm”) have in place to comply with the requirements under the Markets in Financial Instruments Directive 2014/65/EU of 15 May 2014 (“MIFID II”) and the Investment Services and Activities and Regulated Markets Law of 2017, Law 87(I)/2017.

References to Renaissance Capital or the Firm shall be construed as including RESEC as well. The purpose of the Policy is to prescribe the appropriate action required by the Company and the wider Renaissance Capital group to be taken in the case of receiving a complaint by any client.

2. Scope

RESEC does not offer services or carry out any business with retail clients. This Policy has applicability to complaints that may be received from Professional Clients or Eligible Counterparties.

This Policy applies to all RESEC staff.

The Company and Renaissance Capital consider that client complaints are crucial to the long-term business as:

- An efficient handling of such complaints ensures that regulatory and legal risk are substantially reduced;
- An efficient handling of client complaints supports the long term competitive advantage of the business; client disputes, even where client claims are unfounded, bear a reputational and possibly an operational / business impact.

3. Handling of Complaints

The Company’s Client Management Department is responsible for the Complaints Management Function.

The Compliance Department of the Company maintains an Internal Complaints Register documenting the complaints received and actions taken. The Compliance Department is responsible for analyzing complaints and complaints handling data to ensure issues are promptly identified and addressed.

Information on complaints and complaints-handling is provided by RESEC to the Cyprus Securities and Exchange Commission (“CySEC”) on a monthly basis.

3.1. What constitutes a complaint

A **complainant** is defined as any person, natural or legal, which is eligible for lodging a complaint to RESEC and who has already lodged a complaint.

A **complaint** is defined as any oral or written (whether received by letter, fax, e-mail, or other electronic means), expression of dissatisfaction, whether justified or not, from, or on behalf of, a client or potential client about the provision of, or failure to provide, an investment or ancillary service (as defined in Part I and II of the First Appendix of the Investment Services and Activities and Regulated Markets Law of 2017 and RESEC’s Operating License 053/04), which alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience. Non-trivial complaints include complaints that involve allegations of a breach of law or regulation, negligence, serious breach of an obligation, a conflict of interest or a leak of confidential or price sensitive information.

It should be clarified that complaints may relate to the operational support part of providing an investment service and not only to the execution of an investment service; for example, a complaint may relate to a delay in the payment to a client of the funds credited to the client’s account from ‘sell’ trades or it may relate to delays in sending statements of account to the client.

3.2. How to make a complaint

Complaints can be raised by clients with their usual Renaissance Capital contact. If clients are not satisfied with the response of their usual RESEC contact (or prefer not to raise the matter with that contact) they may raise the matter to the Compliance Department at ComplianceCyprus@rencap.com.

Where the client considers that the Company has not addressed their concerns correctly, the client has the right to refer the matter to CySEC at www.cysec.gov.cy or the Financial Ombudsman of the Republic of Cyprus at www.financialombudsman.gov.cy.

3.3. Action upon receipt of a complaint

Where a complaint has been received, all employees must adhere to the following procedures:

- Where a non-trivial complaint has been made verbally, the client should be asked to put his complaint in writing (e-mail is acceptable);
- Any written complaint (whether received by letter, fax, e-mail, or other electronic means), non-trivial verbal complaint or where significant error arise or appear to take place, should immediately be referred to the Compliance Department and the Head of the Department of the person within RESEC and / or Renaissance Capital who received the complaint;
- The Compliance Department should immediately register the complaint in the Internal Complaints Register giving it a unique reference number. The Internal Complaints Register is maintained by the Compliance Department;
- Receipt of the complaint should be acknowledged in writing within a maximum of 5 working days by the responsible person within RESEC and / or Renaissance Capital who received the complaint. The acknowledgement should include information regarding RESEC's complaints-handling process, specifically:
 - a) Information of how to lodge a complaint (e.g. the type of information to be provided by the complainant, the identity and contact details of the person / department to whom the complaint should be directed);
 - b) The process that will be followed by RESEC when handling a complaint (e.g. when the complaint will be acknowledged, indicative handling time, and the availability to contact the CySEC, the Financial Ombudsman, an Alternative Dispute Resolution mechanism, or the relevant Courts);
 - c) The names and position of the person who will investigate the complaint; and
 - d) The complaint's unique reference number to be used in all future contact.

3.4. Responses to complaints

All written complaints must be:

1. Investigated carefully with a view to producing a prompt written response. The proposed written response to the client must be reviewed and cleared by the Compliance Department and depending on the seriousness, at the decision of the Compliance Department or Management of the Company, by the Legal Department.
2. All complaints can only be settled with the approval of the Head of the Department of the employee receiving the complaint and the Compliance Department; based on the seriousness of the complaint and where a potential financial compensation or consequence is likely, Senior Management should be advised for further guidance.
3. All complaints should be resolved as soon as possible and in no event later than within two months of the receipt of the complaint, unless litigation matters arise. A response on the outcome / decision of the investigation should be sent to the complainant within two months of receipt of the complaint. If a resolution is impossible within this timeframe, a

letter should be sent to the complainant advising 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.

4. When providing a final decision that does not fully satisfy the complainant's demands, a letter should be sent to the complainant thoroughly explaining RESEC's position on the complaint and setting out the complainant's option to register the complaint through CySEC, the Financial Ombudsman, and the Arbitration process as per the investment services agreement or the relevant Courts.
5. Where the complaint has been resolved to the satisfaction of the client, every effort should take place to ensure that the acknowledgment of the client's satisfaction is recorded; where such acknowledgement takes the form of only a relevant verbal comment by the client, the employee handling the complaint is encouraged to notify the Compliance Department in order to record this in the Internal Complaints Register.

3.5. Monitoring Complaints

As provided under MiFID II, the Company's Compliance Department is required to analyse complaints and complaints-handling data to ensure that it identifies and addresses any recurring or systemic problems, and potential legal and operational risks.

The monitoring process should include, amongst other:

1. Analysis of the cause of the individual complaints so as to identify the common root causes to various types of complaints;
2. Consideration of whether the said root causes also affect other processes or financial means, including those not directly complained of; and
3. Correction of the root causes.

In practical terms, the person within RESEC and / or Renaissance Capital responsible for handling the complaint will notify the Compliance Department and the Operational Risk Management Unit of the aforementioned information for the purpose of a) all relevant departments being notified, b) the appropriate root causes analysed and people, system or process improvements defined, implemented and monitored, and c) registering the information in the Internal Complaints Register.

4. Training

Training on the Complaints Handling Policy and the handling of client complaints is provided to all relevant staff.

5. Record keeping

Records of all complaints should be retained in line with the Company's Record Keeping Policy. This obligation applies irrespective of whether the complaint involves an allegation of financial loss or material distress or inconvenience, and irrespective of whether they are resolved.

6. Review

The Policy will be reviewed at least annually, or as necessary to keep pace with any changes. The most recent version of this Policy will always be available on our website

[http://www.rencap.com/InvestmentBanking/About/LegalInformation/RenaissanceSecurities\(Cyprus\)Ltd/](http://www.rencap.com/InvestmentBanking/About/LegalInformation/RenaissanceSecurities(Cyprus)Ltd/).

7. Further information

Any queries about this Policy and its application should be directed to the Company's Compliance Department at ComplianceCyprus@rencap.com.