

**B2B PRIME SERVICES EU
LIMITED**
(EX MENASECURITIES LTD)

COMPLAINTS MANAGEMENT POLICY

November 2021

Vs 2.0

Policy Owner:		B2B PRIME SERVICES EU LIMITED (EX MENASECURITIES LTD)		
Created on:		02 April 2020		
Date of approval by the Board of Directors:		06 April 2020		
Version #	Review date	Reviewed By	Comments/Amendments	Approved by the BoD
1.0	02/04/2020	Compliance Officer	First version	06/04/2020
2.0	01/11/2021	Compliance Officer	Add section for submission of complaints to the Financial Ombudsman, ADR, CySEC	05/11/2021

B2B PRIME SERVICES EU LIMITED (EX MENASECURITIES LTD) (hereinafter the "Company", "us", "our" or "we"), is a Cyprus Investment Firm authorized and regulated by the Cyprus Securities and Exchange Commission (hereinafter "CySEC") under license number 370/18, incorporated under Cyprus Company Law with Company Registration Number: HE 357630 and with registered office at 1 Georgiou Kaningos, Pamela Court, Office 104, 3105 Limassol, Cyprus.

1 DEFINITIONS

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

«Complaint» means a statement of dissatisfaction addressed to the Company by a complainant relating to the provision of investment services and/or ancillary services under MiFID.

Client' or 'Customer' means a person, natural or legal, receiving, a service, or engaged in a business relationship with the Company.

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2 COMPANY'S RESPONSIBILITIES

The Company has the responsibility to enable clients or potential clients to express their dissatisfaction with investment services provided by the Company in the interests of investor protection as well as strengthening Company' compliance with its obligations.

Furthermore the Company must ensure that it has a complaints management function, which enables complaints to be investigated fairly and possible conflicts of interest to be identified and mitigated.

The Company has the responsibility to handle clients' or potential clients' complaints effectively and in an independent manner by a complaints management function. In line with the principle of proportionality, that function is carried out by the compliance function.

The Company is required to:

- a) Apply a complaints management policy, which is defined and endorsed by the senior management and the board of directors, who will be responsible for its implementation and for monitoring the Company's compliance with it.
- b) Ensure that the complaints management policy is included in its internal operation manual.
- c) Ensure that the complaints management policy is available to all relevant staff of the Company through adequate internal channels of communication.

3 MAIN PRINCIPLES OF CUSTOMERS COMPLAINTS POLICY

- The Company shall establish, implement and maintain effective and transparent complaints management policies and procedures for the prompt handling of clients' or potential clients' complaints. The Company shall keep a record of the complaints received and the measures taken for their resolution.

The complaints management policy shall provide clear, accurate and up-to-date information about the complaints-handling process. This policy shall be endorsed by Company's management body.

- The Company shall publish the details of the process to be followed when handling a complaint. Such details shall include information about the complaints management policy and the contact details of the complaints management function. The information shall be provided to clients or potential clients, on request, or when acknowledging a complaint. The Company shall enable clients and potential clients to submit complaints free of charge.
- The Company shall establish a complaints management function responsible for the investigation of complaints. This function will be carried out by the compliance function.
- When handling a complaint, the Company shall communicate with clients or potential clients clearly, in plain language that is easy to understand and shall reply to the complaint without undue delay.
- The Company shall communicate the Company's position on the complaint to clients or potential clients and inform the clients or potential clients about their options, including that they may be able to refer the complaint to an alternative dispute resolution entity, as defined in Article 4(h) of Directive 2013/11/EU of the European Parliament and the Council on consumer ADR or that the client may be able to take civil action.
- The Company shall provide information on complaints and complaints-handling to the relevant competent authorities and, where applicable under national law, to an alternative dispute resolution (ADR) entity.
- The Company's compliance function shall analyse complaints and complaints-handling data to ensure that they identify and address any risks or issues.

4 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:

- a) To the Compliance Department through email at compliance@b2prime.com
- b) By registered post at the Company’s Headquarters

Complaints made by Clients cannot be considered unless the Complaint Form is duly completed with all the required information and it is accompanied by adequate supporting evidence (as necessary) for the Client’s claims.

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.

5 HANDLING CUSTOMERS COMPLAINTS

The Compliance Function is responsible for handling customers complains or grievances. Its duties include the effective and efficient handling of customer’s complains or grievances so as to enable the Company to adopt and apply the required actions to prevent the repetition of the same complains or grievances.

The Company shall 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 shall keep a record of each complaint or grievance and the measures taken for the complaint’s resolution.

Upon receive of a complaint the Company is required to:

- Gather and investigate all relevant evidence and information regarding the complaint.
- Communicate in plain language which is clearly understood.

- Provide a response without any unnecessary delay. When an answer cannot be provided within the expected time limits, the Company should inform the complainant about the causes of the delay and indicate when the Company's investigation is likely to be completed.
- 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. Please refer to section 6 for more details.

Complainants shall be able to file complaints and receive the above procedures for complaints free of charge.

The Compliance Function is responsible:

- On request or when acknowledging receipt of a complaint, provide written information regarding Company's complaints-handling process.
- Publish details of Company's complaints-handling process in an easily accessible manner, for example in brochure, pamphlets, contractual documents or via the Company's website.
- Provide clear, accurate and up-to-date information about the complaints-handling process which includes:
 - 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 or department to whom the complaint should be directed),
 - The process that will be followed when handling a complaint (e.g. when the complaint will be acknowledged, indicative handling time, the availability (where applicable) to contact the Commission or the Financial Ombudsman or ADR mechanism or the relevant Courts)
- Keep the complainant informed about further handling of the complaint.

The following procedure is followed:

- The client is informed at the account opening process, by email or through Company's website of Company's complaints-handling process.
- The client contacts the Company to submit a complaint/grievance either by email or registered post.

- The Compliance Function upon receiving the complaint registers the complaint directly to an internal register, giving it a unique reference number. The unique reference number consists of ten digits:
 - the first five digits are the code of the Company regarding the Transaction Reporting System - TRS (i.e. CIF370 for B2B PRIME SERVICES EU LIMITED (EX MENASECURITIES LTD)),
 - the following four digits define the year, and
 - the last four digits denote the number of each complaint serial number (e.g. for 2020 - CIF37020200001, CIF37020200002, for 2021 - CIF37020210001, CIF37020210002).
- The unique reference number is communicated to the complainant.
- The Compliance Function informs the complainant that he should use the said reference number in all future contact with the Company, the Financial Ombudsman and/or the CySEC regarding the specific complaint.
- The Compliance Function records and register the complaint/grievance in the customer's complaint/grievance form which includes the following information:
 - a) details of the client that made the complaint/grievance
 - b) the service/department to which the complaint/grievance refers to
 - c) the details of the employee responsible for the service/s rendered to the client,
 - d) the organizational unit where the relevant employee belongs,
 - e) the date of receipt and of registration of the complaint/grievance,
 - f) the content of the complaint/grievance, in brief,
 - g) the capital and the value of the financial instruments which belong to the client and are registered in his account,
 - h) the 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/grievance,
 - i) the date and, briefly the content of the Company's written response to the complaint/grievance lodged
 - j) a reference to any correspondence exchanged between the Company and the client. Such correspondence should be attached to the file

- The Compliance Function confirms, within five days, to the complainant the receiving of the complaint and that the Company will take all the required actions to resolve the problem, and the approximate time required to do so.
 - The Company investigates the complaint and the Compliance Function reply, within two months, to the complainant about the outcome/decision. Furthermore during the investigation of the complaint, the Compliance Function informs the complainant of the handling process of his/hers complaint.
 - In the event that the Company is unable to respond within two months, the Compliance Function 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 Compliance Function informs the relevant department and senior management for the complaint/grievance.
- Senior Management gives instructions to the Head of the involved department.
- The required action that leads to the solution of the complaint/grievance is taken by the Head of the involved department.
- The action taken is recorded by the Head of the involved department in the complaint/grievance form.
- The Head of the involved department informs senior management and the Compliance Function about the settlement of the complaint/grievance.
- The Compliance Function informs the customer about the given solution to his/her complaint/grievance.
- In case Company's final solution/decision does not fully satisfy the complainant's demands, it shall notify in writing the complainant using a thorough explanation of its position on the complaint and shall 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 Compliance Function communicates with the customer in plain language which is clearly understood.
- One copy of the complaint/grievance form is archived in the customer's file and another copy is kept in a separate file ("complaint/grievance file").

- The Compliance Function provides to the Commission information regarding the complaints it receives as follows:
 - Every month, it provides to the CySEC information regarding the complaints it receives and how these are being handled.
 - In particular, it completes every month (reporting month) the form CIF370_yyyymmdd_COMP-CIF (excel file, the 'Form') defined in Circular C338 dated 11 September 2019 and sends it to the CySEC within five days after the reporting month. The 'Form' is sent in electronic form via the TRS. All relevant details for completing and sending the 'Form' are defined in the Circular C338.
 - The Company has the obligation to submit the Form regardless of receiving or not any complaint within the reporting month.
- Senior Management inspect on an on-going basis the “complain/grievance file” and ensures that the Heads of the departments have taken all the required actions so as to prevent repetition of the same complains/grievances.
- Senior Management analyses 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:
 - Analysing the causes of individual complaints so as to identify root causes common to types of complaints,
 - Considering whether such root causes also affect other processes or products, including those not directly complained of; and
 - Correcting, where reasonable to do so, such root causes
- Senior Management shall inform at least once a year, or more frequent if required, the Board of Directors of all complaints/grievances received, the actions taken to resolve complaints as well as other statistical information.

6 SUBMISSION OF COMPLAINTS TO THE FINANCIAL OMBUDSMAN OR TO AN ALTERNATIVE DISPUTE RESOLUTION (“ADR”) ENTITY OR TO CYSEC OR TO RELEVANT COURTS

A. Submission of Complaints to the Financial Ombudsman

You can refer your complaint to the ‘Financial Ombudsman’ if you are dissatisfied with our assessment and ruling, provided that:

- Your complaint / dispute / objection is up to the amount of €170.000;
- You have previously addressed your complaint in writing to us within fifteen (15) months from the date that you became aware or reasonably you should have become aware of the damaging act or of our failure or the fact that you had reason for submitting a complaint.
- You have received our final response within three (3) months from the date we acknowledge receipt of your complaint and it is not to your satisfaction, or you have not received a reply from us and the three-months period has expired.
- You should submit your complaint to the Financial Ombudsman within a specified period of four (4) months from either the date of receipt of our Final Response or the deadline of the three-month period during which we had to respond to you.
- A decision on the same complaint has not already been issued by a Court of the Republic and a judicial procedure is not pending for the enquiry of the same complaint.

Please ensure that you copy your complaint's unique reference number when you address your formal complaint to the Financial Ombudsman.

Contact details

Financial Ombudsman of the Republic of Cyprus

Address: 15 Kypranoros Str., CY-1061 Nicosia Cyprus

Phone: 22848900

Facsimile (Fax): 22660584, 22660118

E-mail: Complaints: complaints@financialombudsman.gov.cy

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

Website: www.financialombudsman.gov.cy

B. Submission of Complaints to an Alternative Dispute Resolution (“ADR”) Entity

You may be able to refer your complaint against the Company to an “Alternative Dispute Resolution” (“ADR”) entity. If you wish to refer your complaint to an ADR entity in Cyprus, please see below the relevant contact details of the ADR which is registered with the respective national authorities.

Consumer Protection Service

Address: 6 Andrea Araouzou, Nicosia, 1421, Cyprus

Phone: 00357 22867153

E-mail: ccps@mcit.gov.cy

Website: <http://www.mcit.gov.cy/ccps>

More information on ADRs and Online Dispute Resolution of complaints (“ODR”) can be found at: <http://ec.europa.eu/odr>

C. Submission of Complaints to CySEC

You may maintain your Complaint with the Cyprus Securities and Exchange Commission, however, please note that the Cyprus Securities and Exchange Commission does not have restitution powers and therefore does not investigate individual Complaints. However, all complaints submitted to the CySEC are taken into consideration by the CySEC in the performance of its supervisory mandate.

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

D. Submission of Complaints to Relevant courts

In case you are not satisfied with the decision/ruling issued by the Financial Ombudsman or the ADR in relation to your complaint, you may take civil action (i.e. refer to Cypriot Courts).

APPENDIX 1**COMPLAINT HANDLING FORM**

B2B PRIME SERVICES EU LIMITED (EX MENASECURITIES LTD) (“the Company”), whose headquarters are at 1 Georgiou Kaningos, Pamela Court, Office 104, 3105 Limassol, Cyprus, is authorized and regulated by the Cyprus Securities and Exchange Commission (CySEC) under license number 370/18.

The Company is committed to handle promptly and efficiently all client’s complaints or grievances.

Clients may submit their complaints or grievances, using the “Complaint Form”, to the head of Compliance Department. A “Complaint Form” may be submitted to the Company by email, or by registered post.

The Compliance Officer is responsible for handling client’s complaints or grievances. The duties of the Compliance Officer include the effective and efficient handling of client’s complaints or grievances so as to enable the Company to adopt and apply the required actions to prevent the repetition of the same complaints or grievances.

The Company shall maintain effective and transparent procedures for the prompt handling of complaints or grievances received from clients. The Company shall keep a record of each complaint or grievance as well as the measures taken for the complaint’s/grievance’s resolution.

The policy of the Company is to resolve the complaint/grievance within 2 months. In case, due to the nature of the complaint/grievance, more time is required then the Compliance Officer should inform the Executive Director. The Executive Director should full investigate the complaint/grievance in coordination with the head of the involved department and the Compliance Officer and/or the legal advisor.

Contact details of the Compliance Officer:

Mr. George Papanicolaou

Telephone Number: +357 25 582 192

Email: compliance@b2prime.com

Address: 1 Georgiou Kaningos, Pamela Court, Office 104, 3105 Limassol, Cyprus

Note: If the complaint involves the Compliance department, then the “Complaint Form” shall be submitted to the Executive Director to the following address: nick@b2prime.com

COMPLAINT FORM

Way of Communication: <input type="checkbox"/> EMAIL <input type="checkbox"/> REGISTERED POST				
Client details				
Name:			Surname:	
Legal Entity Name:				
Account Number:				
Address:				
Post Code:		City:		Country:
Telephone Numbers:	Home:	Work:	Mobile:	Fax:
Email:				
Brief Summary of the complaint				
Description of product or service and/or department and/or employee you are complaining about (description, evidence, magnitude of damage and suggested way to be solved):				
Please enclose any other relevant documentation that may help us to handle the complaint.				
Signature:			Date:	

For internal use only

Complaint received by:

Date of reception: / /

Reference number:

Department involved:

Employee involved:

Initial response to client: ___ Yes, ___ No

Date: / /

Initial Action Taken:

.....
.....

Informed client of initial action taken: ___ Yes, ___ No

Date: / /

Further Action Taken: ___ Yes, ___ No

Date: / /

Further Action Taken:

.....
.....

File handed on to Compliance Officer: ___ Yes, ___ No

Date: / /

Settlement of complaint: ___ Yes, ___ No

Date: / /

Summary of how the complaint was settled:

.....
.....

Signature of responsible Officer:

Date: / /