

### **COMPLAINTS PROCEDURE FOR CLIENTS**

## Version 1, April 2023

We, 4XHUB EU Ltd (the "Company"), have adopted this Complaints Procedure in order to ensure a fair and quick process for handling complaints that may arise from our relationship.

The Company is authorized and regulated by the Cyprus Securities and Exchange Commission as a Cyprus Investment Firm (CIF License Number 437/23). The Company is registered in Cyprus under the Companies Law, with registration number HE 419115. Its registered office is at 210, Amathoundas, Energy House, Block A, Office 1, Pyrgos, 4534, Limassol, Cyprus.

#### 1. Submitting your Complaint

You may submit your complaint in writing and addressed to the Compliance Function of the Company who is authorized to handle and investigate complaints that may be submitted from our clients.

Please use the relevant Complaints Form attached herein and submit it in any of the following ways:

- 1. By sending by post or delivering in person the attached Complaints Form at the following address: Amathoundas 210, Energy House, Block A, Office 1, Pyrgos, 4534, Limassol, Cyprus
- 2. By submitting the Complaints Form electronically at the following email address: <a href="mailto:complaint@4xhub.eu">complaint@4xhub.eu</a>
- 3. By Facsimile at: +357-

Once you successfully complete and submit your complaint, the Compliance Department of the Company shall handle and investigate your complaint.

### 2. Acknowledging your Complaint

We will acknowledge receipt of your complaint within five (5) days from the receipt of your complaint and provide you the <u>unique reference number</u> of your complaint. The unique reference number should be used in all your future contact with the Company, the Financial Ombudsman and/or CySEC regarding the specific complaint.

### 3. Handling of your Complaint

Once we acknowledge receipt of your complaint we will review it carefully, investigate the circumstances surrounding your complaint and will try to resolve it without undue delay. One of our officers may contact you directly (including communication by email or phone) in order to obtain further clarifications and information relating to your complaint. We shall need your cooperation in order to handle your complaint.



We shall make every effort to investigate your complaint and provide you with the outcome of our investigation within two (2) months from the date you have submitted your complaint to us. During the investigation process will keep you updated on the handling process of your complaint. One of our officers may contact you directly (including communication by email or phone) in order to obtain, where needed, further clarifications and information relating to your complaint.

In the event that your complaint requires further investigation, and we cannot resolve it within two (2) months, we 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, we shall provide you 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 your cooperation. Please note that the Company shall consider your complaint as closed and cease the relevant investigation in case you fail to respond to our officers within the period of three (3) months from the date of the submission of your complaint.

# 4. Final Decision

When we reach an outcome, we will inform you of it together with an explanation of our position and any remedy measures we intend to take (if applicable).

If you are not satisfied with the Company's final decision you may submit your complaint to the Financial Ombudsman of the Republic of Cyprus and seek mediation for possible compensation. It is important that you contact 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 your complaint.

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

- Your complaint/dispute/difference does not relate to an amount exceeding €170.000.
- You first file a complaint in writing to the Company, within fifteen (15) months from the date that you are aware to ought to be aware that the reason of your complaint has occurred.
- You receive our final response within three (3) months from the date we acknowledge receipt of your complaint, and it is not to your satisfaction, or from the closing date by which you should receive our final response in the case you do not receive it.
- The financial business the complaint is directed against must have been in operation, under legal authorization or under the freedom of establishment regime, at the period referred to in the complaint.
- The transaction falls under the supervision of the responsible supervisory authority.



• 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.

In the unlikely event that the Company was unable to provide you with a final response within the three (3) month time period specified above you may again contact the office of the Financial Ombudsman of the Republic of Cyprus no later than four (4) months after the date when we ought to have provided you with our final decision.

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

Website: <a href="http://www.financialombudsman.gov.cy">http://www.financialombudsman.gov.cy</a>

Email: complaints@financialombudsman.gov.cy

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

**Telephone:** +35722848900

Fax: +35722660584, +3572266011

You may maintain your complaint with the Cyprus Securities and Exchange Commission, however, please note that the Cyprus Securities and Exchange Commission does <u>not have restitution powers</u> and therefore does not investigate individual complaints.

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

2. Contact Details of the Cyprus Securities and Exchange Commission:

Website: <a href="http://www.cysec.gov.cy">http://www.cysec.gov.cy</a>

General email: info@cysec.gov.cy

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

**Telephone:** +35722506600

Fax: +35722506700

It is understood that your right to take legal action remains unaffected by the existence or use of any complaint's procedures referred to above.

### 5. Submission of Complaints to an Alternative Dispute Resolution ("ADR") Entity

You have the right to refer your complaint against the Company to an Alternative Dispute Resolution ("ADR") Entity.



#### 6. Civil Action

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

### 7. Monitoring of Complaints

We are required by CySEC to keep detailed records on individual complaints. Further to this and as per the CySEC requirements, we maintain an internal register of complaints where all relevant information of each complaint is kept.

We are required to submit information regarding the complaints we receive from our Clients to CySEC, on a monthly basis. In addition, it is required to report to the Senior Management, on at least an annual basis, on the complaint handling reporting to CySEC, as well as on the remedies undertaken or to be undertaken in relation to any deficiencies and/or weaknesses that may be identified.

Private information is not shared with any third parties and we comply with Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("General Data Protection Regulation", "GDPR" or the "Personal Data Protection Legislation") and the Law providing for the Protection of Natural Persons with regard to the Processing of Personal Data and for the Free Movement of such Data of 2018 (Law 125(I)/2018), as amended from time to time.



## **Client Complaints Form**

This is the form you need to fill in if you wish to submit your complaint to 4XHUB EU Ltd. Complete, up to date as well as accurate information is required to be provided to the Company for the proper investigation and evaluation of your complaint.

Please note that the below Complaint Form is only indicative and not exhaustive. The Company may request further information and/or clarifications and/or evidence as regards your complaint.

1. CLIENT DETAILS:			
1.1	Full Name:		
1.2	Registered Email:		
1.3	Trading Account Number:		
1.4	Nature of Complaint: (please state full details: like date and time the incident occurred, Incident Description, Tickets of all disputable positions and/or Pending Orders department, financial loss, employee who offered services:		
	In case additional space is required for the description of the complaint, please use additional document as appendix to this form		
1.5	Please provide below the name(s) of the contact person(s) of 4XHUB EU Ltd at the time of your complaint:		
1.5.1	Contact Person:		
1.5.2	Contact Person's Email:		
1.5.3	Additional Contact's Name:		
1.5.4	Additional Contact's Email:		

2. NATURE OF COMPLAINT:			
2.1	Please provide a Summary of your complaint in the space provided below. Please try to justify		
	the disputed amount and/or to include details that will facilitate the Company in investigating		
	your complaint:		
2.2	When did the issue you are complaining about take place? *		
	Please enter the date:		
2.3	When did you first notice that there might be a problem? *		
	Please enter the date:		
2.4	Have you communicated your complaint to 4XHUB EU Ltd and/or its associates? *		



2.5	2.5 If your answer to the above question is YES, then please state the date you first informed.					
2.3						
	4XHUB EU Ltd and or its associates of your complaint and the name of the person you discussed your complaint with:					
	Please Enter the Date:					
2.6						
2.6	4XHUB EU Ltd Representative's Name					
	Please, enter the 4XHUB EU Ltd representative's name:					
2.7	4XHUB EU Ltd Representative's Email					
2.7						
	Please, enter the 4XHUB EU Ltd representative's email:					
2.8	Method of Communication:					
2.0						
2.9	Have you reported your complaint to any authority? *					
2.10						
2.10	If you answered Yes to the above, which financial authority have you contacted?					
2.11	Please attach with this form any supporting evidence to your claim that will facilitate the Company's investigation of					
	your complaint. Supporting evidence may consist of any documentation (screenshots, chats, phone records etc) relev					
	to the complaint.					
Signature	ire:	Date:				
	For Official Use Only					
Received on:		signed to:				
Received by:		nature				
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