



## **SKILLING LIMITED**

*Regulated by the Cyprus Securities and Exchange Commission License no. 357/18*

## **COMPLAINT HANDLING POLICY**

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## COMPLAINTS HANDLING POLICY

### 1. Introduction

- 1.1. Skilling Ltd (hereafter the “Company”, “we”, “our”) is authorized and regulated by the Cyprus Securities and Exchange Commission under CIF license number 357/18.
- 1.2. This Policy is governed by Law 87(I)/2017 on Investment Services and Activities and Regulated Markets Law (the “Law”), and the comprehensive Commission Delegated Regulation (EU) 2017/565.
- 1.3. The Company is responsible for providing the clients (hereinafter referred to as the “ Client”, “ you”, “ your”) with the efficient customer service and to treat you fairly. By opening a trading account with the Company, we shall endeavour to review and resolve any of your concerns, feedback, comments, questions and/or expressed dissatisfaction as a matter of top-priority in accordance with the below procedures.
- 1.4. The purpose of this Policy is to set out the procedures to be followed by the Company for the fair and prompt handling of complaints received from Clients as well as the measures taken for the resolution of any situation.
- 1.5. The Company will observe the procedures established in this Policy and pursuant to applicable CySEC laws to ensure that any complaint is effectively resolved within maximum two (2) months, depending on the facts and complex nature of the complaint received.
- 1.6. The Policy as well as any subsequent amendments are binding and thus all the Company’s employees shall at all times strictly follow its provision.

### 2. Definitions

- 2.1. “**Complainant**” means any person, natural or legal, who is eligible to lodge a complaint to the Company and / or who has already lodged a Complaint.
- 2.2. “**Complaint**” means a statement of dissatisfaction addressed to the Company by a complainant relating to the provision of investment services. A non-exhaustive list of issues that may be considered as complaints can be found below:
  - 2.2.1. Execution of orders related issues;
  - 2.2.2. Investment advice;
  - 2.2.3. Unauthorised business;
  - 2.2.4. Withdrawals/deposits related issues.
- 2.3. “**Inquiry**” means any general question submitted to the Company via the website inquiry form, email or chat regarding the provision of investment services and which does not constitute a complaint.

### 3. Inquiries submission

- 3.1. If you have an inquiry or questions in relation to your experience or activity with us, you may file an inquiry form via our inquiry page which is accessible through our Website.

- 3.2. Once we receive your inquiry, an acknowledgment of receipt will be sent to you. We are committed to investigate and address any matters within 5 business days.
- 3.3. If the Company is unable to resolve your inquiry or fails to respond within the set timeframe, you may proceed in filing a complaint by completing our complaint form with all the required information found in section 4 below.
- 3.4. For a detailed description of the inquiry submission procedure, you may visit the Company's Inquiry & Complaints Handling Procedure.

#### **4. Complaints submission**

- 4.1. Complaints may be submitted by using the Company's complaint form which can be provided from our support department upon your request. Once the complaint form is completed you can submit it in one of the following ways:
  - 4.1.1. By email to [compliance@skilling.com](mailto:compliance@skilling.com)
  - 4.1.2. By fax via 00357-2254620 or 00357-22024366
  - 4.1.3. Via post to 2nd Floor, Office/Flat 22, 62 Athalassas Avenue, Strovolos 2012, Nicosia, Cyprus
- 4.2. The Company shall acknowledge via email the receipt of the complaint to the complainant within maximum five (5) business days and shall provide the complainant with the unique reference number and the Company's Complaint Handling Procedure.

#### **5. Steps following the submission of complaints to the Company**

- 5.1. If you are not satisfied with the Company's final decision you may refer your complaint to the competent authorities by quoting your complaint's unique reference number, provided that no court decisions has been issued for the same complaint and/or no judicial procedure is pending for the examination of the same complaint as required under applicable laws and regulations.
- 5.2. The Financial Ombudsman website can be accessed via: <http://www.financialombudsman.gov.cy>
- 5.3. The Cyprus Exchange Securities (CySEC) website can be accessed via: <https://www.cysec.gov.cy>
- 5.4. The complainant reserves the right to take any legal action and/or to refer his/ her complaint against the Company to the ADR Firm in case that the complaint is unresolved and/or if the client remains dissatisfied with the decision outcome.

#### **6. Complaints Handling**

- 6.1. Once your complaint is acknowledged, we will carefully investigate it and will try to properly resolve it within a reasonable time.
- 6.2. If deemed necessary, the complaint shall be escalated to the Compliance Department for further investigation.

- 6.3. In the case that the Complaint is submitted in a language other than English, a true translation must be obtained.
- 6.4. At all times, the complainant shall be informed by the Company in regard to the handling process of his/her complaint.
- 6.5. We shall use our best endeavours to provide you with the outcome of our investigation within two (2) months from the day of the submission of your complaint.
- 6.6. In the event that your complaint requires further investigation, we will inform you of the reasons for the delay and indicate when it is likely for the investigation to be completed. In any event, this period of time cannot exceed three (3) months from the initial submission of the complaint.
- 6.7. Upon investigation completion, the Compliance Department shall inform the complainant in writing, using plain language which is clearly understood, about the results of the investigation and actions taken to satisfy the complainant's demand(s).

## **7. Procedures following the receipt of a complaint**

- 7.1. Upon receipt of a complaint, the Compliance Department shall register the complaint to an internal register, giving it a unique reference number.
- 7.2. The registration of each complaint received shall be performed no later than one (1) business day following the date of receipt, and the access to the Complaints Register should be restricted to authorised employees only.
- 7.3. Upon receiving a written complaint, the Company should obtain and record amongst others, the following details:
  - 7.3.1. Personal information of the client
  - 7.3.2. Client's account number
  - 7.3.3. The complaint's category and description
  - 7.3.4. The service provided by the Company and related to the complaint
  - 7.3.5. Disputable amount where applicable
  - 7.3.6. Date of receipt and registration of complaint
  - 7.3.7. Settlement date
  - 7.3.8. Evidence and/or supporting documents related to the complaint
- 7.4. The facts as stated by the client are examined and verified, to establish if any additional information is needed to be retrieved from the Company's archive (electronic mail, recorded telephone calls, IT data, etc.).
- 7.5. In the case where a complaint is valid, the management shall take such necessary action together with the Head of Department(s) to which the complaint is related, in order to identify and verify: (1) Reasons for failure to follow procedure; (2) Weaknesses of the internal controls; and (3) Implementation of internal controls to prevent any complaints in the future.

- 7.6. The Company has the right to refrain from reviewing a complaint where:
- 7.6.1. It is classified as an inquiry. The complainant maintains the right to request for the re-classification of his/her inquiry as a complaint.
  - 7.6.2. It is unable to identify the complainant's identity.
  - 7.6.3. It includes offensive language directed either to the Company or an employee of the Company.
  - 7.6.4. It is received through telephones, unless the complainant subsequently submits the complaint form as evident.
- 7.7. The Company is required by law to provide the Cyprus Securities and Exchange Commission (hereafter the "CySEC") information regarding the received complaints and complaints-handling on a monthly basis.

## **8. Internal analysis of complaints on an ongoing basis**

- 8.1. The Company undertakes to analyse, on an ongoing basis, complaints-handling data, to ensure that they identify and address any recurring or systemic problems, and potential legal and operational risks. Such analysis shall include the causes of complaints in order to identify root causes common to those types of complaints and correction of such roots where deemed necessary.
- 8.2. Depending on the seriousness of the complaints, they may be classified as serious complaints or regular complaints. In all cases, complaints regardless of their impact, are dealt with the maximum attention and urgency.
- 8.3. Complaints may be resolved by means of an explanation or an apology, or even financial compensation.

## **9. Record Keeping**

- 9.1. We maintain records of all complaints as well as all related details for a minimum period of five (5) years and where requested by CySEC, for a period of up to seven (7) years.
- 9.2. Records shall be stored in a medium so that they are readily accessible and available to clients on request, and such records shall be presented in the same language(s) as that used to provide investment services to clients.

## **10. Policy Review**

- 10.1. The Company must analyse on an on-going basis the complaints-handling related data in order to identify common issues arising from various types of complaints and initiate appropriate actions to make the Complaints redressal mechanisms more efficient and effective.
- 10.2. The Company's policy is assessed and periodically reviewed, at least on an annual basis, or more frequently, should the need arise and any amendments to this policy shall be approved by the Company's Board of Directors. The client shall be notified in writing of the nature of the changes deemed appropriate by law, and the revised policy will be available on the Company's Website.