



GWG (CYPRUS) LIMITED

COMPLAINTS MANAGEMENT POLICY

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OWNER:	GWG (Cyprus) Ltd
CONTACT PERSON:	Compliance Officer
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GWG (CYPRUS) LTD
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GWG (CYPRUS) LIMITED

TABLE OF CONTENTS

1. Introduction.....	2
2. General Principles.....	2
3. Collection of Information.....	3
4. Registering a Complaint.....	3
5. Complaint Handling	3
6. Internal Analysis and Correction of Complaints.....	4
7. Record Keeping.....	4
8. Review and Monitoring of this Policy.....	5



GWG (CYPRUS) LIMITED

1. INTRODUCTION

1.1 This Complaints Management Policy (the “Policy”) defines the principles that apply to GWG (Cyprus) Ltd, (the Company). The purpose of this Policy is to define the arrangements employed by the Company for the reasonable and prompt handling of complaints.

1.2 The Company will act in accordance with the best interests of its clients and will ensure it has appropriate systems and controls in place so that its clients, including potential clients, have access to adequate complaints handling and redress mechanisms that are accessible, independent, fair, accountable, timely and efficient.

2. GENERAL PRINCIPLES

2.1 This Policy shall follow the undernoted principles:

- Fair treatment of clients.
- Complaints raised by clients are dealt with courtesy and on time.
- Clients are fully informed of avenues to escalate their complaints and their rights to alternate remedy if they are not fully satisfied with the Company’s response to their complaints.
- The Company will treat all complaints efficiently and fairly as they can damage the Company’s reputation and business if handled otherwise
- The Company’s employees must work in good faith and without prejudice to the interests of the clients.

2.2 Therefore, the Company shall:

- Establish and maintain a complaints management procedure for clients or potential clients, which shall provide clear, accurate and up-to-date information about the complaints-handling process;
- Publish the details of the process to be followed when handling a complaint. Such details shall include information about the complaints management procedure and the contact details of the complaints management function. This information shall be provided to clients or potential clients, on request, or when acknowledging a complaint;
- establish a complaints management function within its Compliance Department which enables complaints to be investigated, analysed and resolved;
- communicate to clients in plain language that is clearly understood and provide a response to the compliant without any unnecessary delay;
- explain to the client or potential client the Company’s position on the complaint and set out the client’s or potential client’s options, where relevant, that they may be able to take civil action;
- provide information on complaints and complaints-handling to the Cyprus Securities and Exchange Commission (CySEC);



GWG (CYPRUS) LIMITED

- ensure its complaints management function shall analyse complaints and complaint handling data to ensure that they identify and address any risks or issues.

3. COLLECTION OF INFORMATION

3.1 In order to investigate and resolve potential complaints received, the Company shall collect and record the following information:

- Date of receipt and of registration of the complaint;
- Details of the client submitting the complaint, including:
 - National Identification and/or Passport Number
 - Country of Residence
- Content and reason of the complaint, including:
 - The complaint cause
 - The financial instrument involved
 - The disputed amount
 - The settlement date
- Service/department to which the complaint relates to
- Details of the Company's employee responsible for the service(s) rendered to the client
- Magnitude of the damage which the client claims to have suffered and/or which can be presumed to have suffered on the basis of the contents of the complaint
- Date of the Company's answer
- The content of the Company's written response to the complaint lodged
- Reference to any correspondence exchanged between the Company and the client which should be attached to the Company's file for internal record keeping requirements.

4. REGISTERING A COMPLAINT

4.1 If for any reason the client is not entirely satisfied with any aspect of the Company's services, the client shall inform the Company as soon as possible:

1. Orally, over the telephone or through the website chat to the customer support
2. By submitting the Complaint Form at complaints@gwtrade.eu.

4.2 If the client has any supporting and/or documentary evidence to support the complaint, the client should ensure such information is collected and forwarded to the Company.

5. COMPLAINT HANDLING



GWG (CYPRUS) LIMITED

- 5.1. In case the complaint is received by customer support by email or by phone, the complaint will be forwarded to complaints@gwtrade.eu to be reviewed and investigated by the Compliance Department.
- 5.2. Upon receipt of the complaint by the Compliance Department, the Compliance Officer shall assess whether there are grounds for a complaint under its policies and procedures and all applicable laws and regulations. The Company shall seek to gather and investigate all relevant evidence and information regarding the complaint and identify possible conflicts of interest in order to mitigate them and ensure the complaint's fair redressal.
- 5.3. For an investigation to be fair, it shall be thorough, although the Company aims to conclude cases as quickly as possible, without undue delays, and always within the timeframes of the law, as follows:
 - Within five (5) days, the client shall receive confirmation of receipt of its complaint. During the investigation of the complaint, the Company shall inform the client of the handling process
 - Within four (4) weeks, the Company shall send the client a final response on the outcome and decision.
 - However, if the complaint cannot be processed within this period, the Company will inform the client in writing that the investigation is continuing, the reasons for the delay, and when the Company expects to be able to contact the client again.
 - If the investigation is not concluded within two (2) months of receipt of the complaint, the Company will inform the client of the reasons for the further delay, indicating when it is likely to provide the client with its final response. This period shall not exceed three (3) months from the submission of the complaint.
- 5.4. When a final decision does not fully satisfy the client's demands, the Company shall notify the client in writing, thoroughly explaining its position on the complaint.
- 5.5. In case the customer is not satisfied with the Company's response, he/she has the option to submit his complaint to the following authorities:
 - The Financial Ombudsman of the Republic of Cyprus:
Address: 13 Lord Byron Avenue, 1096 Nicosia, Cyprus
Telephone: +357 22 848900
Email: complaints@financialombudsman.gov.cy
Website: www.financialombudsman.gov.cy
 - Cyprus Consumer Center for Alternative Dispute Resolution
16 Kyriakou Matsi Str., Eagle House, 8th floor, 1082 Nicosia
Telephone: + 357 22519741
Electronic submission: <https://adrcyprus.com/en/submit-a-dispute/>
 - Cyprus Securities and Exchange Commission (CySEC)
19 Diagorou Str. CY-1097 Nicosia



GWG (CYPRUS) LIMITED

Telephone: +357 22506600

Electronic submission only: <https://www.cysec.gov.cy/en-GB/investor-protection/how-to-complain/>

- 5.6. 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.**
- 5.7. If the client believes there is a reason to make a civil claim against the Company, they may seek their own legal advice straight away. The client is advised to not wait until the Company's investigation process has concluded.

6. INTERNAL ANALYSIS AND CORRECTION OF COMPLAINTS

6.1 It shall be the responsibility of the complaints management function to analyse, on an ongoing basis, complaint-handling data to ensure that recurring or systemic problems and potential legal and operational risks are identified and addressed. Such analysis shall include the causes of complaints so as to identify root causes common to such types of complaints. The root causes shall then be considered to determine whether they may affect other processes or products, including those not directly complained of. The Company shall Ensure that root causes are corrected, where reasonable.

7. RECORD KEEPING

7.1 The Company maintains records of all complaints as well as all related details for a minimum period of five (5) years after termination of the business relationship with its clients and in accordance with the applicable record keeping legislative requirements as these may be amended from time to time.

8. REVIEW AND MONITORING OF THIS POLICY

The Compliance Function monitors the effectiveness of this Policy and complaint management procedures as part of its compliance monitoring programme. This Policy is reviewed periodically and no less than annually, to ensure that it continues to meet the Company's regulatory and compliance obligations.