



COMPLAINTS HANDLING PROCEDURE

A.J.K. Wealth Management Limited ("AJK Wealth", "our", "we") is an authorized Cyprus Investment Firm (CIF) which is regulated by the Cyprus Securities and Exchange Commission ("CySEC"), under License number 139/11.

As part of our commitment to provide the best possible quality of service to our clients we uphold effective and transparent procedures for the reasonable and prompt complaint handling for existing and potential clients. We maintain Records of Complaints and measures taken for prompt and efficient complaint resolution, in line with applicable Laws, Rules and/or Regulations and we are pleased to operate in accordance with the Complaint Management Procedures of CySEC.

We will deal with the client complaint in a prompt and efficient manner by following the procedure outlined below to ensure that the complaint is resolved within a period of two months. If the complaint is complex and takes longer than two months to resolve, we will communicate the reasons for the delay and we will attempt to send our response within three months of receiving the formal complaint by the client. It should be noted that during the investigation of the complaint, we will inform the client on a regular basis of the status of the handling process.

Any complaint must be dealt with within Cyprus, in accordance with the Complaint Handling Procedures set forth herein and the client agrees that we shall have the right to resolve any complaint between us in accordance with the Complaint Handling Procedures set forth herein. If the complaint or dispute cannot be resolved internally in accordance with our Complaint Handling Procedures set out herein, the client may refer the matter to the Financial Ombudsman of the Republic of Cyprus.

Complaints Handling Procedure

The client must always submit the complaints in writing, as clearly and as detailed as possible, to enable action to be taken. All complaints will be handled promptly, treated fairly and with strict confidentiality.

A formal complaint form should be submitted to AJK Wealth's Complaints Officer at any time in writing by completing and sending the report which can be found in page 3 below, named as "Complaint Form". The formal complaint form must only be forwarded to the following electronic address which solely belongs to AJK Wealth's Complaints Officer: complaints@ajkwealth.com

The Board of Directors of AJK Wealth has appointed the Compliance Officer to also act as Complaints Officer.

A complaint or grievance is initially handled by a Compliance Officer who shall immediately register the complaint in the Company's internal register and give it a unique reference number.

The Compliance Officer shall then communicate the receipt of the complaint along with the unique reference number to the complainant. He shall also inform the complainant that the said reference number will be used in future communication with AJK Wealth, the Financial Ombudsman or CySEC when discussing the specific complaint. The links for their websites are the following:

- http://www.financialombudsman.gov.cy/forc/forc.nsf/page15_en/page15_en?OpenDocument
- <http://www.cysec.gov.cy/en-GB/complaints/how-to-complain/>

Upon receipt of a client complaint, written acknowledgment will be sent to the client by e-mail within five (5) business days from the date the complaint was received.

The Compliance Officer shall then take all necessary actions to ensure that the complaint or grievance is properly addressed by forwarding it to the head of the department the complaint is addressed to. He shall inform the client that the complaint or grievance has been forwarded to the relevant department/personnel, providing all details so that the client is aware who is dealing with his/her complaint or grievance.



It may be possible at this stage to offer a full reply / settlement which is reasonably expected to be acceptable to the complainant. In this case, the letter will also clearly state that the complaint will be treated as settled if the client does not indicate dissatisfaction within one month of receiving the letter. If the complainant does not, in fact, indicate dissatisfaction within one month, the complaint may then be treated as settled.

If it is NOT possible to resolve the complaint within five (5) business days, a letter of acknowledgement will be sent as indicated below:

The letter of acknowledgement will include statements to the effect that AJK Wealth will:

- i. Investigate the complaint; and
- ii. On completion of the investigation, will inform the complainant of the outcome of the investigation.

Upon the completion of the investigation by the Complaints Officer, a letter must be sent to the complainant explaining clearly:

- i. The outcome of the investigation;
- ii. The nature and terms of any offer of settlement which AJK Wealth is prepared to make in satisfaction of the complaint;
- iii. The name of the Complaints Officer who dealt with the complaint;
- iv. The letter will also clearly state that AJK Wealth will treat the complaint as settled if the complainant does not indicate dissatisfaction within one month.

If, for any reason, we are unable to conclude the investigation and provide a response to the complaint within the time limits set forth above, we will inform the client that we cannot provide a response to the complaint within the aforementioned time limits and to provide a further indication of what is happening with the complaint and also to provide an indication of when the client can expect our feedback.

The Company will fully co-operate with CySEC in case it carries out its own investigation in relation to a client's complaint.

The Complaints Officer is responsible for keeping a full record of each complaint, including all relevant documents, such as outcome of the investigation; the nature of any offer of settlement which is considered appropriate or alternatively, the reasons for declining to offer a settlement and the action taken in response, and will be kept by the Company for five (5) years after the date of the last response.

Complaints Register:

Upon receiving a written complaint or grievance, the following details shall be obtained and recorded by the Compliance Officer:

- The identification particulars of any client having made a complaint or grievance.
- Date of receipt and registration of complaint or grievance.
- The identity of the employee who initially received the complaint.
- The service provided by AJK Wealth which is related to the complaint or grievance.
- The employee responsible for the provision of those services.
- The department to which the employee belongs.
- The content of the complaint or grievance.
- The magnitude of the damage claimed by the client.
- Reference of any correspondence exchanged between AJK Wealth and the client.

The Complaints Record and Register will be available for inspection by CySEC at any time.

Every month, within five (5) days after the reporting month, AJK Wealth will submit form COMP-CIF (excel file) to CySEC in order to inform them of the complaints the Company has received and how these complaints have been handled.



COMPLAINT FORM

Please complete this form if you have any complaints as regards to the services provided by A.J.K. Wealth Management Limited.

Client Information

Name: Surname:

Legal Entity Name:

Account Number:

Address:

Post Code: City: Country:

Home Tel: Work Tel: 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 assist us to handle the complaint.

Signature: Date: