

Complaints Handling Policy

Purpose

To describe the handling of Clients' complaints and lay out all the measures taken by the Company in order to resolve potential inconveniences affecting the relationship between the Company and its existing or potential Clients.

Resolution of Clients' complaints is achieved without undue delay, taking into consideration the seriousness of the complaint as well as the financial implications this may have to both the Client as well as the Company.

Upon receipt of such complaint by the Company, a written confirmation of receipt will be sent by the Compliance Department back to the Client together with a note that the complaint will be investigated, and the results will be communicated to the Client as soon as possible.

Operational Procedure

Operational procedures for the handling of complaints received by Stone Edge Capital Ltd are outlined in this policy. This present policy is compliant with Circulars CI144-2012-05 of 2012 and C100 of 2015 issued by the Cyprus Securities & Exchange Commission.

The following information should be collected and recorded:

- date of receipt and of registration of the complaint;
- details of the Client that made the complaint;
- service/department to which the complaint relates to;
- details of the Company's employee responsible for the service/s rendered to the Client;
- content of the complaint, in brief;
- 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;
- date of the Company's answer;
- briefly, 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.

Procedures of handling Clients' Complaints

Complaints submission

Clients can submit a complaint to the Company by using the Complaints Form which is also available in the website. The Form shall be duly completed, including all relevant information and signature of the Client (as applicable);

The form can be sent to Stone Edge Capital Ltd via:

- e-mail: support@stedcap.com
- fax: +357 25 728 708
- post: 85 Michael Zavou Str., 1st floor, 4107, Limassol, Cyprus

Complaints receipt

Following receipt of the complaint, the Client will receive a Complaints Acknowledgement E-mail indicating the expected timeframe for investigation and resolution of the problem.

The formal complaint will be forwarded to the Company's e-mail address (support@stedcap.com), from which it will be investigated by the Compliance Officer of the Company.

All Formal Complaints must be in writing, in the manner set forth above, for action in accordance with the procedures described below. Upon receipt of a Formal 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.

This Acknowledgement will confirm that we are taking the necessary action needed to resolve the Complaint and will also provide an approximate timescale required in order to do so and will further state who within our Company is dealing with the Complaint and how to make contact with them (this will normally be the Compliance Officer).

Should the Client feel dissatisfied with the Company's assessment and the complaint relates to possible compensation claim, the Company would like to inform the Client that he/she has the right to refer the Complaint to 'The Financial Ombudsman of the Republic of Cyprus' which is the competent body to examine compensation claims via an extrajudicial procedure.

Should the Client consider submitting such a complaint to the Financial Ombudsman in writing either by post or by e-mail, the contact details appear below:

The Financial Ombudsman of the Republic of Cyprus The Financial Ombudsman of the Republic of Cyprus

Address: 13 Lord Byron Avenue, 1096 NICOSIA / Telephone: +357 22848900 (main number) / facsimile (Fax): +357 22660584, +357 22660118

E-mail:

- Complaints: complaints@financialombudsman.gov.cy
- Financial Ombudsman: fin.ombudsman@financialombudsman.gov.cy
- Official Website: www.financialombudsman.gov.cy

Maintaining internal register

Upon receipt of a complaint, the Company must register the complaint directly to an internal register and assigning a unique reference number to the said complaint. The unique reference number is communicated to the complainant. The Company shall inform the complainant that he/she should use the said reference number in all future contact with the CIF, the Financial Ombudsman and/or the CySEC regarding the specific complaint.

Record Keeping

The Company shall maintain a record of all complaints and related details for a minimum period of five (5) years in accordance with the applicable legislation.

Review of this Policy

This Policy will be reviewed and/or amended annually and/or as and when considered necessary by the Board of Directors of Stone Edge Capital Ltd. The policy shall appear on the Company's website.