COMPLAINT HANDLING POLICY

EXENICO (CY) LTD

Last Updated:	**October 2026**
Company Number:	**HE 360960**
CIF License Number:	**343/17**

The purpose of this Complaints Handling Policy (the "**Policy**") is to set out the procedures to be followed and the appropriate actions to be taken by EXENICO (CY) Ltd (ex. Grandis Securities Ltd) (hereafter the "**Company**") in the cases where a complaint or grievance is received from any of the Company's Clients.

The complaints management procedures for the handling of any complaints received by the Company are established in compliance with CySEC Circular C338, and the European Banking Authority ("EBA") and European Securities and Markets Authority ("ESMA") Guidelines on Complaints – Handling for Securities and Banking Sectors (JC 2019 35) and Article 26 of Commission Delegated Regulation (EU) 2017/565, with the aim to establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling and resolution of complaints or grievances received by the Company in respect of its licensed activities.

The aim of the procedures established in the current Policy is to deliver a consistent, high-quality and accountable response to each official complaint, regardless of the subject matter.

1. Definitions

"Complainant" means any Client, natural or legal, who is eligible for lodging a Complaint to the Company and who has already lodged a Complaint.

"Complaint" or "Grievance" means a statement of dissatisfaction addressed to the Company by a Complainant relating to the provision of investment services.

The Company shall establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling of Complaints or Grievances received from clients, and to keep a record of each Complaint or Grievance and the measures taken for the Complaint's resolution.

"Activities supervised by Competent Authorities" means activities pursuant to Article 4(3) of the ESMA1 Regulation, or Article 4(2) of the EBA2 Regulation, or Article 5 of the Mortgage Credit Directive;

2. How to file a complaint

Clients' complaints or grievances are initially handled by the Compliance Department. However, the final settlement of non-trivial complaints or grievances needs to be escalated and approved by Senior Management.

A complainant shall complete the Complaint Form provided by the Company (available on **Appendix 1** of this Policy and on the Company's Website).

Once completed, it should be sent either:

Themistokli Dervi 40, 3rd Floor, Office 301, 1066, Nicosia, Cyprus | t: +357 22322002 | e: info@exenico.com | www.exenico.com
Exenico (CY) Ltd (ex. Grandis Securities Ltd) is a Cypriot Investment Firm (CIF), regulated by CySEC under license number: 343/17

a. as a hard copy along with a copy of the complainant's identification document and any additional documentation that would be relevant to the complaint, to the Company's head offices which are situated at:
40 Themistokli Dervi, 3rd floor, office 301, CY-1066, Nicosia, Cyprus, or
b. by e-mail to info@exenico.com

3. Internal procedures for handling a complaint

The procedure followed by the Company when handling Clients' complaints or grievances, is the following:

a. A Complaint or Grievance is initially handled by the Compliance Department to the addresses specified above. The Compliance Department shall register the complaint directly to an internal register, giving it a unique reference number.

The unique reference number consists of ten digits:

- the first two digits represent the code assigned to the Company by CySEC for reporting through its transaction reporting system
- the following four digits define the year, and
- the last four digits denote the number of each complaint serial number

b. Upon receiving a written complaint or grievance, the following details are obtained and recorded:

- The identification particulars of any client who submits a complaint or grievance,
- The service provided by the Company and related to the complaint or grievance,
- The employee responsible for the provision of those services,
- The department where the employee belongs,
- Date of receipt and registration of complaint or grievance,
- Content of the complaint or grievance,
- The capital and the value of the financial instruments which belong to the client,
- The magnitude of the damage claimed by the Client,
- A reference to any correspondence exchanged between the Company and the Client.

c. The events leading to the complaint or grievance will be examined and assessed based on the information provided by the Client;

d. As a next step, the Compliance Department will forward within two (2) working days the complaint or grievance to the relevant department involved in the case, with instructions to provide all information and evidence available, to allow investigation of the Client's claim;

e. The department involved in the case shall provide all information and evidence collected to the Compliance Department, no later than 2 (two) working days from the receipt of the Compliance Department's instructions;

f. Upon completion of the investigation a report shall be prepared stating the facts of the complaint. The report shall be brought to management's attention, who shall then decide on the formal response to the Client and the action to be taken;

g. The events leading to the complaint or grievance and all the information provided by the complainant and the relevant department of the Company involved in the case shall be examined and assessed in order to reach a fair outcome;

h. The Company shall confirm to the complainant via email, within five (5) business days from the receipt of the complaint or grievance, that the complaint or grievance is under investigation and shall provide the complainant with the unique reference number assigned to the specific complaint;

i. The complainant shall use the reference number provided to them in all future contacts with the Company, the Financial Ombudsman (where applicable) and / or the Cyprus Securities and Exchange Commission regarding the specific complaint;

j. In the case that the complaint or grievance is in languages other than English or Greek, a true translation must be obtained;

k. The complainant shall be regularly updated on the development and the handling process of their complaint. Where further details on the Client's complaint are considered needed the Compliance Department shall call the specific Client for a personal interview or discuss the matter over the phone, as appropriate to better identify the nature of the complaint;

l. The Company sets five (5) business days from the day of receipt of the original complaint or grievance as a standard investigation period. If the investigation is completed in less than ten (10) business days, the complainant shall be informed about the results of the investigation immediately upon its completion. However, if a complaint is not resolved within the standard investigation period, the Company shall inform the complainant in detail about the causes of delay, a status of the investigation process and an expected date for completion of the investigation;

m. Upon investigation completion, a member of 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);

n. Where the case is not closed within the standard investigation period as specified in the above point, the Company shall deliver its final resolution on the case no later than two (2) months from the receipt of the complaint. The findings and proposed solutions will be clearly communicated to the Client in a written form, explaining in detail the Company's position on the specific case;

o. If a complaint cannot be resolved within the specified period of two (2) months, due to its complicated nature or where further clarification of circumstances is required, the Company shall inform the complainant of the reasons for the delay and shall indicate the period of time within which is expected the investigation to be completed. This period of time will not exceed three (3) months from the submission of the initial complaint;

p. The Company has the right to refrain from reviewing a complaint when:

i. The information of the complaint prevents the Company to identify the applicant's identity;
ii. The complaint includes offensive language directed either to the Company or an employee of the Company.

q. All non-trivial complaints or grievances shall be brought to the attention of and their resolution should be approved by Senior Management;

r. If the complainant feels dissatisfied with the response received and the settlement conditions offered to them, the complainant could refer their complaint (using the assigned unique reference number provided by the Company), along with a copy of the final response from the Company, to the Financial Ombudsman of the Republic of Cyprus and / or the Cyprus Securities and Exchange Commission for further investigation of the case.

4. Corrective measures triggered by Client's complaints

In case where a client complaint or grievance is valid, the Company's Management shall take all necessary actions, together with the Head of Department(s) to which the complaint or grievance is related, in order to identify and verify:

- Reasons for failure of the procedure followed
- Weaknesses in internal controls
- Implementation of internal controls that would prevent any complaint or grievance in the future

All suggested procedures shall be approved by Senior Management at the meeting following the completion of the investigation. Procedural manuals should be updated to reflect the approved changes and shall be communicated to all involved staff members.

At the end of each month the Compliance Officer shall inspect the "complaint/grievance file" and ensure that the Heads of the Departments have taken all the required actions so as to prevent repetition of the same complaints/grievances.

The Compliance Officer shall ensure that procedure manuals are updated to address and prevent any drawbacks in the Company's procedures that may cause malpractices and respectively Customers' complaints.

The Compliance Officer shall inform at least once per year the Board of Directors of all complaints/grievances received.

If you are not satisfied with the Company's final decision you may check with the office of the Financial Ombudsman of the Republic of Cyprus in case you are eligible to file a complaint with them and seek mediation for possible compensation. The Financial Ombudsman website can be accessed via: http://www.financialombudsman.gov.cy.

5. Complaint cases not covered under the current Policy

The present Complaints Handling Policy does not apply where the Company receives a complaint about:

- activities which fall outside of those supervised by Competent Authorities; or
- the activities of another entity for which the Company has no legal or regulatory responsibility (and where those activities form the substance of the complaint).

However, the Company shall respond, where possible, explaining the Company's position on the complaint and/or, where appropriate, giving details of the firm or other financial institution responsible for handling the complaint.

6. Review of Complaints received on an on-going basis

The Company analyzes, on an on-going basis, complaints-handling data, to ensure that it identifies and addresses any recurring or systemic problems, and potential legal and operational risks, for example by:

- Analysing the causes of individual complaints so as to identify root causes common to types of complaints;
- Considering whether such root causes also affect other processes or financial means, including those not directly complained of; and
- Correcting, where reasonable to do so, such root causes.

The Complaints Handling Policy shall be reviewed and/or amended annually or as and when considered necessary by the Board of Directors or when changes or amendments to operating requirements are issued by CySEC.

7. Reporting of Complaints

Information regarding the complaints received by the Company and how those are being handled shall be disclosed to CySEC through the submission of the relevant form via TRS within five (5) days after the reporting month.

8. Record-keeping of Complaints or Grievances received

The responsible department for the record keeping of Complaints or Grievances received is the Compliance Officer. In particular, the Compliance Officer, or his designee, will keep a record of each Complaint and the measures taken for the Complaint's resolution.

Complaints are registered once received in an internal archive as appropriate. The Compliance Officer, or his designee, maintain a central record of all Complaints that includes the following information:

- name, address and account number (if available) of the Complainant;
- date on which the Complaint was received;
- department(s) involved the Complaint investigation along with the names of the responsible employees;
- description of the nature of the Complaint;
- disposition of the Complaint.

One copy of the complaint form is archived in the Client's file and another copy is kept in a separate file ("complaints/grievances file").

The Company maintains all Complaints or Grievances for a minimum period of five (5) years, or up to seven (7) years where requested by CySEC.

If you have any questions on how to lodge a complaint or in relation to the complaint handling procedure please contact info@exenico.com.

Appendix 1 – Complaint Form

Dear Valued Client,

Kindly complete, sign and send a copy either by email to info@exenico.com or the original letter by post to our mailing address: 40 Themistokli Dervi, 3rd floor, office 301, CY-1066, Nicosia, Cyprus. You hereby acknowledge your awareness about the terms and conditions related to the complaint procedure.

Client's Name	
Client's Account ID	
Residential Address	
Brief Description of the complaint	

Please enclose any evidence and relevant documentation

Name	**Signature**	**Date**

For internal use:

Employee initially handling the complaint			
Date of Receipt:		**Date of Initial Respond:**	