



CTS Cloud Trading Solutions Ltd

Complaints Handling Policy
September 2023



1. Introduction

CTS Cloud Trading Solutions Ltd, previously registered as Novox Capital Ltd, (the “**Company**”) is a Cyprus Investment Firm authorised and regulated by the Cyprus Securities & Exchange Commission (the “**CySEC**”), under License No.: 224/14.

The Company has adopted the following Complaints Handling Policy, aiming to establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints and/or grievances received from its clients, including record-keeping requirements and measures taken for the resolution of each complaint, in line with the applicable legal framework.

2. Complaints Submission Procedure

i. Filing a Complaint

Clients wishing to submit a complaint, are advised to complete the Complaint Form and submit it via the following means:

- By sending the complaint form via registered mail to the head-offices of the Company located at 75 Athalassas Avenue, Nicosia, 2012, Cyprus; or
- By sending the complaint form electronically via email to the Compliance Department at compliance@could-trading.eu

Clients shall request the “Complaints Form” by sending to compliance@could-trading.eu

ii. Complaints Receipt & Investigation

Upon receipt of a complaint, the Company’s Compliance Department will register it internally and assign a unique reference number, which will be further communicated to the client. It should be noted that the unique reference number shall be used for all future correspondences between the client and the Company, as well as CySEC and the Financial Ombudsman, where applicable.

Within five (5) business days, the Compliance Department will respond to the complainant by sending an acknowledging receipt of the complaint. Where needed, the Compliance Department may contact the complainant to request further explanations and/or clarifications for the resolution of the complaint.

Within fourteen (14) business days, it is expected that the Compliance Department’s investigation shall be concluded, depending on the complexity of each case. In case the investigation is not completed within this timeframe, the complainant shall be informed timely, and shall be continued to be periodically informed on the investigation’s progress until the complaint is resolved.

In any case, the complainant will be informed regarding the outcome of the investigation within two (2) months from the submission date of the complaint. In the event that the Compliance Department is unable to respond within this timeframe, the complainant will be informed of the reasons for the delay and the expected timeframe for completing the investigation. Under no circumstances, the resolution period can exceed three (3) months from the submission date.

iii. Escalation Procedures

In case the complainant is not satisfied with the Company's resolution, he/she may refer the complaint with a copy of the final response from the Company to CySEC by following the procedure indicated, as follows:

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

Additionally, clients who consider that they have any disputes with CTS Could Trading Solutions Ltd, for example claiming damages, are encouraged to consider submitting their complaint to the Cyprus Financial Ombudsman for further investigation and resolution, as follows:

- Address: 13 Lord Byron Avenue, 1096 Nicosia
- Telephone No.: +357 22-848900
- Fax No.: +357 22-660584
- Email: complaints@financialombudsman.gov.cy
- Website: <http://www.financialombudsman.gov.cy/>

3. Responsible Individual(s)

All complaints are processed and investigated by the Company's Compliance Department, in line with the applicable regulatory framework. The Compliance Department is acting independently and objectively, so as to ensure that corrective measures are introduced to prevent the repetition of the same complaints and/or grievances, thus enabling the Company to adopt and apply the required actions to fully protect its clients' interests.

In the cases where the complaint and/or grievance involves the Compliance Department, the complaint is to be handled by the Chief Executive Officer (CEO) of the Company.

4. Complaints Handling Principles

The Compliance Department shall take all necessary measures in order to:

- Gather and investigate all relevant evidence and information regarding the complaint;
- Communicate in plain language, which is clearly understood by the complainant;
- Provide a response without any unnecessary delay or at least within the time limits set above; and
- When providing a final decision that does not fully satisfy the complainant's demand, include a thorough explanation of the Company's position on the complaint.