

### *Complaints handling Procedure*

All complaints must be submitted through the company's complaint form to the company's Customer Services Department and send to Complaints Manager.

The complaints will also be referred to the Compliance Function at all stages of the procedure from the receipt of the Complaint to the final filing of the complaint. Complaints received that relate to the Back Office and Customer Services Department or the Compliance Function, will be communicated to the Senior Management of the Company which will be then responsible for analysing and resolving the complaint. Any complaint received that relate to Senior Management will be communicated to the non-Executive members of the BOD. In any case, the BOD shall be informed in regards to all important complaints received, as well as the measures taken for resolving these.

The Back Office and Customer Services Department will deal with all complaints received by clients and the Head of the BackOffice Department will be the Complaints Manager responsible to ensure that the proper procedure is followed.

Once the complaint is received by the appropriate personnel, will be recorded through the relevant Complaint Form and given a unique number, for ease of reference.

The unique reference number must be consisted of ten digits as below:

- The first two digits are the code of the CIF, in our case it is NU.
- Following four digits define the year, and the last four digits denote the number of each complaint serial number (e.g. for 2015 - AA20150001, AA20150002, for 2016 - AA20160001, AA20160002).

The Company shall confirm, within five days, the receiving of the complaint to the complainant.

Once the unique reference number is communicated to the complainant, the Company shall inform the complainant that he should use the said reference number in all future contact with the Company, the Financial Ombudsman and/or the CySEC regarding the specific complaint.

The Company has to investigate the complaint and reply, within two months, to the complainant about the outcome/decision. It is provided that, during the investigation of the complaint, the Company has to inform the complainant of the handling process of his/hers complaint.

In the event that the Company is unable to respond within two months, it informs the complainant of the reasons for the delay and indicates the period of time within it is possible to complete the investigation. This period of time cannot exceed three months from the submission of the complaint.

Every month, the Compliance Officer is responsible to provide CySEC information regarding the complaints the Company received and how these are being handled.

In particular, the Company has to complete every month (reporting month) the form XX\_yyyymmdd\_T144-002-01 and send it to the CySEC within five days after the reporting month. The 'Form' is to be sent in electronic form via the TRS.

In the event where the Company has resolved and/or revised a complaint which was referred to the CySEC in a previous submission of the above mentioned 'Form', the CIF must complete all the fields of the 'Form' and select the 'U' from the column Record Type.

The complaint form, with the response given to the complainant, will be filed for future reference.

If the complainant is not satisfied with the company's response he / she can escalate the complaint through the Commission, the Financial Ombudsman, ADR Mechanism, or the relevant Courts.