[COMPLAINT HANDLING PROCEDURE]
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1. Policy

The complaint management procedures for the handling of complaints received by Fortified capital Limited are based on Circular No. CI144-2012-05, issued by the Cyprus Securities and Exchange Commission and CySEC Directive DI78-2012-03, with the aim to establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints or grievances received from current or potential unit-holders, and keep a record of each complaint or grievances and the measures taken for the complaint’s resolution.

The Procedure Manual for handling client’s complaints gathers all measures taken by the Company in order to solve potential inconveniences that might occur among the business relation.

2. Procedure

2.1 Filing Complaints

The clients willing to submit a complaint are advised to complete a Complaint Form and to send it to the Company through the following means:

- By sending an e-mail with a brief explanation of the subject of complaint at complaints@forticap.eu
- By sending the complaint via registered mail at: Forticap Ltd, 236 Strovolou Avenue, 3rd Floor, 2048 Strovolos, Nicosia, Cyprus
- By sending the complaint via fax at: +357 22495717

The complaint form can be sent electronically to the unit-holder concerned upon the receipt of a inquiry or can be downloaded from the Company’s website www.forticap.eu.

2.2 Receiving Complaints

After receiving the complaint, the Compliance Department notifies by the end of the next working day the complainant that his inquiry was received and provides him / her with the name and the contact details of the person who is handling the complaint received.

Any complaint form received by the Company will be assigned a protocol number and registered in Complaints’ Register maintained by the Compliance Department. The complaint will be examined and resolved by the Compliance Department in cooperation with the Manager of the Department involved with the complaint. Depending on the nature and the possible claims arising thereof, a briefing or an opinion may be sought from the Legal Advisor of the Company.
2.3 Handling Complaints

The Compliance Department is responsible for handling customers' complaints or grievances. Their duties include the effective and efficient handling of customer’s complaints or grievances so as to enable the Company to adopt and apply the required actions to fully protect the customers’ and the company’s interests, acting independently and objectively and insuring that corrective measures are introduced to prevent the repetition of the same complaints or grievances. In the cases where the complaint or grievance involves the Compliance Department it is to be handled by the General Manager.

In the Compliance Officer absence, the General Manager shall be responsible for the implementation of the Company’s Complaints Handling Procedures.

2.3.1 The Complaint form

The Complaint form along with the current Complaint Handling Procedure is available on the Fortified Capital Limited website (www.forticap.eu).

The Compliance Department records the complaint in the customer’s complaint form which includes the following information:

- details of the client that made the complaint
- the service/department to which the complaint refers to
- the details of the employee responsible for the service/s rendered to the client,
- the organizational unit where the relevant employee belongs,
- the date of receipt and of registration of the complaint,
- the content of the complaint, in brief,
- the capital and the value of the financial instruments which belong to the client and are registered in his account,
- the 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,
- the date and, briefly the content of the Company’s written response to the complaint lodged
- a reference to any correspondence exchanged between the Company and the client.
2.3.2 Review

The Compliance Officer shall review carefully the details of each Client’s complaint. Once the Compliance Officer understands fully the nature of the Client complaint, he/she shall investigate and question the relevant Heads of the Departments related to each Client complaint and will:

- Solve the Complaint by replying to the complainant and informing the CEO regarding the decision

Or

- Seek assistance by the manager CEO

2.4 Solving Complaints

The Head of the relevant department shall take all necessary measures:

- investigate and question the relevant personnel of the Departments related to each complaint (if necessary),
- communicate with other Head of Departments/employees if this is require for solving the Complaint,
- call the specific Client for a personal interview or discuss the matter over the phone, as appropriate to identify the nature of the complaint

If necessary, the Compliance Officer will investigate the relevant Heads of Departments related to each Client complaint. Once the Compliance Officer and the CEO thoroughly analyse the matter, the decision will be communicated to the complainant and / or the person in charge of the client complaint. Where applicable the Board of Directors as well as the legal advisor of the Applicant shall also be informed.

2.4.1 Time frame

According to the Company’s policy, the complaints will be solved in maximum 10 working days.

In case, due to the nature of the complaint, more time is required for the complaint to be fully investigated and solved, the Head of the relevant Department should inform the Compliance Officer. The Compliance Department shall notify the complainant about the investigation running and to inform him/her about the approximate time period until the final response is sent, is laid down, which cannot be longer than 45 days starting from the working day following the reception of the initial complaint or the reception of additional evidence provided by the unit-holder concerned.
The Compliance Officer should fully investigate the complaint/grievance in coordination with the Head of the involved department and if deem necessary with the CEO and/or the legal advisor.

3. Records and measures

The Company shall maintain effective and transparent procedures for the prompt handling of complaints or grievances received from Clients. The Company shall keep a record of each complaint or grievance as well as the measures taken for the complaint’s/grievance’s resolution.

The Compliance Department shall maintain all complaints, all relevant correspondence and documents related to complaints, for a minimum period of five years.

One copy of the complaint form is archived in the client’s file and another copy is kept in a separate file (“complain/grievance file”)

At the end of each month the CEO inspects the “complain/grievance file” and ensures 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 procedure manuals are updated to address and prevent and drawbacks in the Company’s procedures that may cause malpractices and respectively Customer’s Complaints.

The General Manager shall inform at least once a year the Board of Directors of all complaints / grievances received.

Final Provisions

Along with the final response sent to the complainant Fortifies Capital Limited will inform the complainant that he / she may refer the complaint with a copy of the final response from the Company to the Cyprus Securities and Exchange Commission for further investigation if he / she feels dissatisfied with the response received and the settlement conditions offered to him / her.