

Noemon Finance Ltd

Clients Complaints Handling Policy and Procedure

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1. Introduction

Noemon Finance Limited is a private limited company incorporated in the Republic of Cyprus (Registration Number HE 427234), authorised and regulated by the Cyprus Securities and Exchange Commission (“CySEC”) as a Cyprus Investment Firm (“CIF”) under licence number 449/24 (hereinafter the “Company”). Following the implementation of the Markets in Financial Instruments Directive 2014/65/EU (“MiFID II”) and pursuant to the Commission Delegated Regulation (EU) 2017/565 supplementing MiFID II and the provisions of the Investment Services and Activities and Regulated Markets Law of 2017 as in force from time to time (the “Law”), the Company is required to establish, implement and maintain effective and transparent procedures for the prompt and efficient handling of clients’ or potential client’s complaints and keep a record of the complaints received and the measures taken for their resolution.

This Client Complaints Handling Policy and Procedure (the “Policy and Procedure”) outlines the steps the Company follows upon receiving a complaint from a client or potential client (other than in relation to personal data), including the applicable timelines up to the completion of the Company’s internal investigation and the communication of the outcome to the complainant.

2. Definitions

Complainant means any natural or legal person who expresses dissatisfaction to the Company regarding any aspect of the investment or ancillary services provided or offered.

Complaint means any statement of dissatisfaction addressed to the Company (other than in relation to personal data) by a client or potential client relating to the provision of investment services or ancillary services.

3. Queries

Potential clients who have questions or need assistance during the onboarding stage, can contact us by sending an email to onboarding@noemon.finance. Clients and potential clients who have general queries regarding the Company’s services,

products, or their interactions with the Company may contact us by email at support@noemon.finance copying info@noemon.finance to request further information or clarification. The Company will aim to respond to all queries promptly, or, where this is not possible, within 48 hours of receipt.

4. Handling of Complaints

A client or potential client may submit an official complaint to the Company if they are not satisfied or fully satisfied with the response to a query submitted in accordance with Clause 3. above, or may submit a complaint directly, without first raising a query.

Clients and potential clients may submit an official complaint to the Company free of charge by completing the Complaint Form included as **Appendix A** hereto. The completed, signed, and dated Complaint Form, along with any supporting evidence, should be sent by email to complaints@noemon.finance. If the complaint concerns the handling of personal data, you should follow the procedure set out in the Company's Privacy Policy available on the Company's website.

Upon receipt, each complaint will be recorded in the Company's Internal Complaints Register and assigned a unique reference number.

The Company will acknowledge receipt of a complaint **within five (5) business days**, providing the unique reference (10 digit) number assigned to the complaint. This reference number should be quoted in all communications with the Company, the Financial Ombudsman and/or the CySEC regarding the complaint. The acknowledgment will also confirm that the complaint is being investigated.

The Company will investigate the complaint and inform the complainant of the outcome **within two (2) months** from the date the complaint was received. During the investigation, the Company will keep the complainant informed about the progress and the handling process of their complaint.

During the course of the investigation of the complaint, the Company might require and request additional information from the client or potential client.

If, due to the nature of the complaint, its investigation requires more time and the Company is unable to provide a response within two (2) months, the Company will inform the complainant of the reasons for the delay and indicate the expected timeframe for completion. In any case, the investigation shall be completed **within three (3) months** from the date the complaint was submitted.

Within **five (5) business days** of completing the investigation, the Company will provide the complainant with a written report, which will include:

- i. The outcome of the investigation.
- ii. The nature and terms of any settlement offer the Company is prepared to make.
- iii. The reasons for declining to offer a settlement, if applicable.
- iv. A statement that the complaint will be treated as resolved if the complainant does not indicate dissatisfaction **within one (1) month** of receiving the report.

5. Complaints regarding CIFs

If you do not receive a response from the Company within the above timeframes, or if you are not satisfied with the Company's final response, you may submit a complaint as follows:

- A. To **CySEC** by completing the electronic form available [here](#). Please note that CySEC does not have the power to provide restitution and does not investigate individual complaints. However, all complaints submitted to CySEC are considered in the exercise of its supervisory responsibilities.

The details of the CySEC are as follows:

Office Address: 19 Diagorou Street, 1097 Nicosia, Cyprus

Postal Address: P.O BOX 24996, 1306 Nicosia, Cyprus

Telephone: +357 22506600

Fax: +357 22506700

E-mail: info@cysec.gov.cy

Website: www.cysec.gov.cy

The Company will fully cooperate with CySEC during any investigation of a complaint.

B. You may contact the **Office of the Financial Ombudsman** within **four (4) months** of receiving the Company's final response to determine whether you are eligible to file a complaint and seek mediation for possible compensation. If you do not submit your complaint within the abovementioned timeframe, the Financial Ombudsman may not be able to investigate it. The Financial Ombudsman is an independent authority that resolves disputes between consumers and businesses providing financial services, including CIFs.

The details of the Financial Ombudsman of the Republic of Cyprus are as follows:

Office Address: 15 Kypranoros, 1st floor, 1061 Nicosia

Postal Address: P.O. Box 26722, 1647 Nicosia

Phone: +357 22848900

Facsimile (Fax): +357 22660584, +357 22660118

Website: www.financialombudsman.gov.cy

Electronic Addresses (E-mails):

Information: enquiries@financialombudsman.gov.cy

Complaints: complaints@financialombudsman.gov.cy

The Company will provide full cooperation to the Financial Ombudsman in connection with any investigation conducted by the latter in connection with a complaint.

C. If you are not satisfied with the decision of the Financial Ombudsman, you may, as a last resort, pursue the dispute **through the courts**. Typically, this involves filing a civil action with the District Court.

6. Complaints Monitoring

The Company continuously reviews and analyses complaints-handling data to identify and address any recurring or systemic issues. This monitoring process includes, inter alia:

- Assessing the causes of individual complaints to identify any common root causes across different types of complaints;
- Evaluating whether these root causes affect other processes or financial instruments, including those not directly subject to complaints; and
- Implementing corrective measures to address and resolve the identified root causes.

Appendix A – Complaint Form

Please complete the form below with the required information and submit it, along with any supporting documentation to complaints@noemon.finance

<u>(POTENTIAL) CLIENT INFORMATION</u>	
Full Name:	
ID/Passport No.:	
E-mail:	
Client Type (Individual or Corporate):	
Client ID/Account Number (if applicable):	
If you are acting on behalf of someone else, please state the name of the represented person and attach the relevant Power of Attorney. Otherwise, please state N/A	
<u>DETAILS OF COMPLAINT:</u>	
<p>Please provide a complete and accurate description of the matter giving rise to your complaint. Please select from the below list the option that best describes the cause of your complaint:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Execution of orders (e.g. delay in execution, re-quotes, slippage, erroneous trades etc.) <input type="checkbox"/> Investment Advice (e.g. unsuitable advice) <input type="checkbox"/> Portfolio Management <input type="checkbox"/> Quality or lack of information provided <input type="checkbox"/> Terms of contract/fees/charges <input type="checkbox"/> General admin/customer services (including custody/safekeeping services) <input type="checkbox"/> Unauthorised business being offered or carried out <input type="checkbox"/> Issue in relation to withdrawal of funds <input type="checkbox"/> Other (please specify): <p>Please also mention the date(s) when the relevant event(s) took place, the financial instrument concerned, the identity of any Company employee(s) involved, a summary of all relevant communications, the transaction ID (if applicable) and the amount disputed:</p>	

Kindly list any supporting documentation or evidence you are submitting together with this Form (e.g. emails, account statements, transaction confirmations, etc.)

Desired Resolution (Explain what you consider to be an appropriate resolution to your complaint)

Have you contacted any authorities regarding your complaint? If Yes, please indicate the name of the authority you contacted:

Declaration:

I hereby confirm that the information provided in this Form is accurate and complete to the best of my knowledge.

Complainant Signature:

Date:

For Internal Use Only

Complaint received on:

Unique Reference No:

New complaint or update of another complaint submitted in the past:

Department involved:

Employee(s) involved:

Date of acknowledgment of complaint: / /

Description of Initial Action Taken:

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.....

Date the complainant was informed about Initial Action taken: / /

Description of Further Action taken (if applicable):

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.....

Date the complainant was informed about Further Action taken (where applicable):

/ /

Settlement of complaint: Yes No

Date of Settlement (if applicable): / /

Summary of how the complaint was settled:

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.....
.....

Settlement Amount (if applicable):

Name of Responsible Officer:

Signature of Responsible Officer:

Date: / /