

COMPLAINTS HANDLING POLICY



GENERAL

ATRIAFINANCIAL LTD (herein "the Company" or "we") maintains effective and transparent procedures for the reasonable and prompt handling of concerns and/or queries and/or issues and/or complaints received from retail or professional clients and keeps a record of each complaint or concern and the measures taken for its resolution.

The Company's aim is to provide a high level of service to all of its clients at all times and ensure that the Company handles complaints fairly, efficiently and effectively. The Company appreciates that from time to time things can go wrong or there can be misunderstandings, however the Company is committed to deal with concerns and complaints positively and supportively in line with complaints handling procedures and legislative requirements.

DEFINITIONS

<u>Complainant:</u> any person, natural or legal, which is eligible for lodging a compliant to the Company and who has already lodged a complaint.

<u>Complaint:</u> a statement of dissatisfaction addressed to the Company by a complainant relating to the provision of investment services.

PROCEDURE

If you are dissatisfied with the service provided by ATRIAFINANCIAL LTD, or if you have a query or concern regarding your account or activity with the Company, please contact our Customer Support as soon as possible by email to support@evest.com.

Clients' complaints are initially handled by the Customer Support Department which it determines whether the concern can be resolved immediately or if it will require further investigation. The Company will carry out the review of the issue and attempt to achieve an adequate solution, under consideration of the client's vested interests, as well as those of the Company.

The Customer Support Department should make all best efforts to ensure that in case the complaint is being of such a nature that can be resolved immediately (within 5 business days), to do so that the client will be satisfied and will not have to pursue the filling of a formal complaint.

If the client is not satisfied with the response to the concern received, then the client may raise this further with the Compliance department following the process indicated in the paragraph below.

FORMAL COMPLAINT

A complaint will be recorded as an official written complaint by the Company and will be handled as such only if it is duly submitted with all the required information as described below. Without prejudice to the generality of the above, the Company shall treat each case separately on a case-by-case basis and categorize the matter as complaint as long as adequate particulars of conduct being alleged against the Company can be identified.

The clients willing to submit a complaint are advised to send their complaint to the Company via email to compliance@mena.evest.com.

A complaint must include amongst other:

ATRIAFINANCIAL LTD (ex. MAGICPATH CAPITAL LTD)



- 1. Client's name, surname.
- 2. Account Number
- 3. Date and time of the said complaint
- 4. The content of the complaint (in summary).

Upon receiving the complaint, the Company will immediately be registered in the internal register of the Company giving it a unique reference number. The employee receiving the complaint confirms within 5 days the receiving of the complaint and communicates to the client the unique reference number of his complaint to use for all future contact with the Company. We shall make every effort to investigate your complaint and provide you with the outcome of our investigation within two (2) months from the date you have submitted your complaint to us. During the investigation process will keep you updated of the handling process of your complaint.

Accordingly, and upon its discretion, the Company has an additional month to resolve a Complaint, if it is unable to resolve a Complaint within two (2) months.

The following details must be documented and kept in records by the Customer Support Department, in regards to complaints:

- 1. The details of the ID of the client who filed the complaint/grievant.
- 2. The service to which the complaint refers to.
- 3. The details of the employee that undertook to provide the service to the client.
- 4. The department or organisational unit to which the employee relates to.
- 5. The date of receipt of the complaint.
- 6. The content of the complaint.
- 7. The extent in financial terms of the potential loss that the client claims he has suffered or as it is derived from the content of the complaint.
- 8. The date and in summary, the content of the reply of the Company to the said complaint.

Upon completion of the investigation, a response is prepared by the Compliance Department, brought to Senior Management's attention and Senior Management gives the final approval for the formal response to the client and the actions and measures to be taken.

RECORD KEEPING OF COMPLAINTS

The Company shall maintain all complaints for a minimum period of seven years after the execution of the complaint and/or termination of the business relationship with the Client. The responsible departments shall be the Compliance Department and the Customer Support Department.