

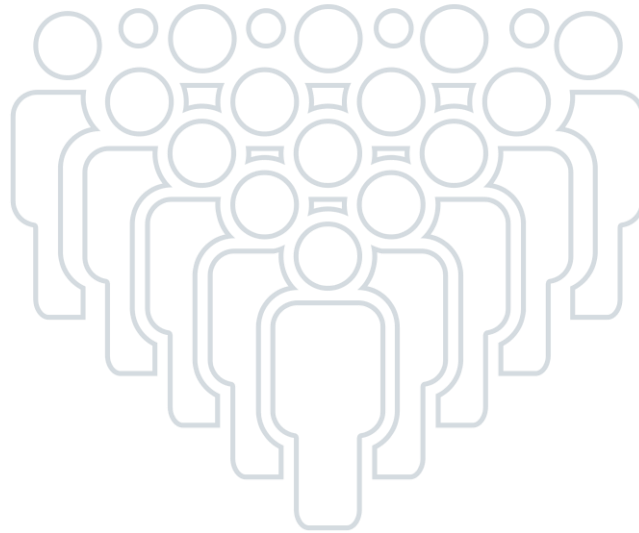


CrowdTech

COMPLAINT POLICY AND PROCEDURE JANUARY 2021

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CrowdTech

1. INTRODUCTION

Crowd Tech Limited (hereinafter “Crowd Tech” or the “Company”) is a Cypriot Investment Firm incorporated and registered under the laws of the Republic of Cyprus, with registration No. HE 297365. The Company is authorised and regulated by the Cyprus Securities and Exchange Commission (hereinafter “CySEC”) under the license No. 202/13.

The Investment Services and Activities and Regulated Markets Law of 2017 (L.87(I)/2017 regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets), including all its amendments and the Directives issued by CySEC (the “Regulations”) are the regulatory framework that it abides by.

In accordance with the provisions of CySEC’s Circular C338, paragraph 13 of DI144-2007-01 of 2011 and CI144-2012-05, the Company has to maintain an effective and transparent procedure for handling complaints and grievances from clients. The Company keeps records of each complaint or grievance including measures taken for its resolution.

2. DEFINITION

The Company considers as a complaint an expression of dissatisfaction by a client regarding the provision of investment and/or ancillary services provided by the Company, based on actual or supposed circumstances that have caused hardship or harm to its’ originator, received in writing by the Company

3. PROCEDURE

1) Submitting your Complaint

We, Crowd Tech Limited, (hereinafter, the “Company “) have adopted this Complaints Procedure in order to ensure efficient and fair process for handling complaints that may arise from our relationship.

When submitting your Complaint, you may submit your complaint in writing. You are encouraged to use the Complaints Form attached herein and submit it in the following way:

By Submitting the Complaints Form electronically at one of the following email addresses, as applicable:

1. Support@trade360.com for general and technical problems only
2. Complaints@trade360.com for regulation disputes

The Customer Support shall deal with clients’ complaints unless in cases when a conflict of interest might occur. In such cases the Managing Director and/or the Compliance Officer shall deal with it. In case the client does not consider that the Customer Support Department has solved the complaint, then they may contact the Compliance Officer directly.

2) Acknowledging your Complaint

The Company acknowledges receiving of the submitted Complaint noting the approximate time for resolving the case as follows:

We will acknowledge receipt of your complaint within five (5) working days, including providing you with the unique reference number (URN) and with clear mention that the client should use the said reference number in all future contact with the CIF, the Financial Ombudsman and/or the CySEC regarding the specific complaint.

In case when due to the nature of the complaint/grievance, more time is required, the Head of Customer Support shall inform you accordingly.

A holding response will be issued to you within four (4) weeks of receiving the complaint if no final resolution can be issued at that time.

In cases where the complainant responds, a **Further Acknowledgement** will be proposed in the next five (5) business days.

3) Handling of your Complaint

The Company will endeavor to issue a final resolution no later than two (2) months from the date that the initial complaint was submitted. During the investigation of the complaint, the Company informs the complainant of the handling process of the complaint.

In case a Client complaint is not settled within the two (2) months period, the Company will still send a written response informing you about the status of your complaint. In the event that the Company is unable to offer a resolution to the Client's complaint within the required two (2) months period, it will contact you explaining the reasons of its inability to offer a solution and present an alternative date on which the solution will be given. The new date cannot be later than three (3) months from the submission of your complaint.

The full complaint procedure maintained by the Company is also available on the Company's Website, Section 21 of the Terms and Conditions.

4) Final Decision

When we reach an outcome, we will inform you together with an explanation of our position and any remedy measures we intend to take if applicable.

If you are not satisfied with the Company's final decision you may check with the office of the Financial Ombudsman of the Republic of Cyprus in case you are eligible to file a complaint with them and seek mediation for possible compensation. It is important that you contact the Financial Ombudsman of the Republic of Cyprus within four (4) months of receiving a final response from the Company otherwise the Financial Ombudsman of the Republic of Cyprus may not be able to deal with your complaint

Contact Details of the Financial Ombudsman of the Republic of Cyprus:

Website: <http://www.financialombudsman.gov.cy>

Email: complaints@financialombudsman.gov.cy

Postal Address: P.O. BOX: 25735, 1311 Nicosia, Cyprus

Telephone: +35722848900

Fax: +35722660584, +35722660118

You may maintain your complaint with the Cyprus Securities and Exchange Commission. However please note that the Cyprus Securities and Exchange Commission does not have restitution powers and therefore does not investigate individual complaints.

It is understood that your right to take legal action remains unaffected by the existence or use of any complaint's procedures referred to above.

Contact Details of the Cyprus Securities and Exchange Commission:

Website: <http://www.cysec.gov.cy>

General email: info@cysec.gov.cy

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

Telephone: +35722506600

Fax: +35722506700

4. RECORDS AND REPORTS

The Company shall keep detailed documentation of all complaints and grievances.

The client shall receive a full copy of the complaint and all related records. Another copy shall be kept in clients' file with the Company.

5. UPDATES

The Company will perform a periodical review of this Policy, at least once a year. The Policy in line with the Company's operational model, and therefore in case of any changes in the operations, these will be properly reflected in this policy.

The logo for CrowdTech, featuring the word "Crowd" in a light blue color and "Tech" in a grey color, with a faint background graphic of a crowd of stylized human figures.

6. COMPLAINTS FORM

This is the Form you need to fill in if you wish to submit your complaint to the Company. Complete up to date as well as accurate information is required to be provided to the Company for the proper investigation and evaluation of your complaint.

Kindly note that the below Complaint Form is only indicative and not exhaustive. The Company may request further information and/or clarifications and/or evidence as regards your complaint.

DATE:

CLIENT INFORMATION

Name:

Surname:

ID or Passport Number:

Country of nationality:

Legal Entity Name (in case the Client is a legal person):.....

Account Trading Number:.....

CONTACT DETAILS OF THE CLIENT

Postal Address:.....

City/Province:.....

Code: Country:.....

Telephone Number:.....

Email:.....

Please advise your most convenient method of communication:.....

DETAILS OF THE COMPLAINT

Date when the Complaint was created:.....

Employee who offered the services to the Client:.....

Description of the Complaint: (use a separate sheet if necessary).....

I hereby certify and confirm that to the best of my knowledge, the information furnished above is true, accurate, correct and complete.



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