

## INVESTOR COMPENSATION FUND POLICY

### 1. INTRODUCTION

**Royal Financial Trading (Cy) Ltd**, hereinafter referred to as the “Company” or “OneRoyal” is incorporated in the Republic of Cyprus with Certificate of Incorporation No. HE349061. The Company is authorized and regulated by the Cyprus Securities and Exchange Commission (‘CySEC’), with license No. 312/16, and operates under the Provision of Investment Services, the Exercise of Investment Activities, the Operation of Regulated Markets and Other Related Matters Law of 2017, Law 87(I)/2017, as subsequently amended from time to time (the “Law”). The Company's head office is located at 152 Franklin Roosevelt Avenue, Limassol, 3045, Cyprus

The Company is operating under Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on Markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU (the “Markets in Financial Instruments Directive 2014/65/EU” or “MiFID II”) and amending Directive 2002/92/EC and Directive 2011/61/EU, as last amended by Directive (EU) 2016/1034 of the European Parliament and of the Council, of 23 June 2016 and under (EU) No 600/2014 of the European Parliament and the Council of 15 May 2014 on markets in financial instruments and amending Regulation (EU) No 648/2012 (the “MiFIR”)

This notice is provided to you in accordance with the Markets in Financial Instrument Directive II, or “MiFID II”, and Regulation (EU) No 600/2014 on the markets in financial instruments, or “MiFIR”, of the European Union because you are considering dealing with the Company in the financial instrument provided by the Company (“Financial Instruments”).

### 2. SCOPE OF THE COMPLAINT HANDLING PROCEDURE

The scope of this policy is for the Clients or potential Clients to be able to express their dissatisfaction in respect to the investment services and/or activities provided by the Company as well as strengthening the Company's compliance with its obligations.

The Company maintains effective and transparent procedures for the reasonable and prompt handling of complaints received from complainants with records of each complaint as well as the actions taken to remedy the situation.

We will acknowledge receipt of your complaint within five (5) business days from the receipt of your complaint and provide you the unique reference number of your complaint. The unique reference number should be used in all your future contact with the Company, the Financial Ombudsman and/or CySEC regarding the specific complaint. The unique reference number consist of 10 digits noting the code of the CIF, the year and number of the complaint.

### 3. DEFINITIONS

Complaint is a statement of dissatisfaction addressed to the Company by a natural or legal person relating to an investment service provided by the Company.

A Complainant is any person, natural or legal, who is presumed to be eligible to have a complaint considered by a firm and who has already lodged a complaint.

The complaints must be directed by the complainant to the Company's Compliance Department by filling out the relevant forms (Form in Appendix 1 for Trading Operations complaints, and Form in Appendix 2 for Non-Trading Operations complaints and submit to the Company via the following methods:

- a. By email: **complaints@oneroyal.com.cy**
- b. By post or in person at the Company's Registered Address

As can be seen in the Appendix, a complaint shall include:

- The client's full name
- The client's trading account number
- The affected transaction numbers, if applicable
- The date and time that the issue arose
- A description of the issue

In case the Company receives a notice through the line of communication established by the Company to receive complaints, but which does not fall within the definition of 'complaint' above and can be characterized as an enquiry; it shall be categorized as an enquiry rather than a complaint and will be forwarded to the relevant department to be handled accordingly. The complainant maintains the right to request for the re-classification of his enquiry as a complaint.

#### 4. PROCESS FOR HANDLING

The Compliance Department shall efficiently handle any complaint received by the complainants. In case the complaint involves the Compliance Department; the complaint shall be handled by a member of Senior Management. Further to the above, the Compliance Department shall follow the procedure described below when handling complaints:

- 4.1 Once the complainant files a complaint, an electronic acknowledgement of receipt will be sent to the email address of the complainant to ensure that the Company has received the complaint and is currently working on a resolution. The Company should also provide to the complainant, via the same email, a unique reference number of the complaint for future reference.
- 4.2 The Company, upon examining the complaint and reaching a decision in this respect, shall reply to the complainant with the remedial actions to be taken or provide further clarifications, and the reasoning behind the Company's decision, as applicable.

**The Compliance Department shall:**

- a. Send an initial response to the client within five (5) business days, confirming the receiving of the complaint;
- b. Investigate the complaint and reply within two (2) months, to the complainant about the outcome/decision where during the investigation of the complaint, the Compliance function should inform the complainant of the handling process of his/her complaint;
- c. In the event that the Company is unable to respond within two (2) months, the Company will inform the complainant of the reasons of the delay and will indicate the period of time within which it is possible to complete the Investigation.

When deemed necessary, the Compliance Department shall submit to Senior Management the aforementioned details for further investigation. In this case, the Company might take additional time to finalize the reply; therefore, it shall duly notify the complainant about the causes of the delay and indicate when the Company's investigation is likely to be completed.

Senior Management shall investigate further and coordinate with relevant heads of departments to attend to the subject of the complaint. A final response, or a holding response, will be sent to the complainant explaining the findings of the investigation.

Where a holding response is warranted, the Company shall state the reasons why it has not been able to resolve the complaint and provide an indication of the time needed to resolve the issue.

The period of complication of the investigation cannot exceed three (3) months from the period of submission of the complaint.

In case the Company's final decision does not satisfy the complainant's demands, the latter may refer the complaint to the Financial Ombudsman.

Further information about the procedures for communicating with the Financial Ombudsman can be found at [www.financialombudsman.gov.Cy](http://www.financialombudsman.gov.Cy)

All complaints shall be treated confidentially.

The Company endeavors to ensure all Communication is in plain language which is clearly understood

## 5. COMPLAINTS REGISTER

The Company maintains all complaints it receives on an internal register, as quickly as possible, and in an appropriate manner. The Company is required to provide CySEC with information regarding the complaints it receives via an electronic form on a monthly basis.

**COMPLAINT FORMS****APPENDIX 1****Type: Trading Operations**

Name \_\_\_\_\_

Surname \_\_\_\_\_

Email \_\_\_\_\_

Account No. \_\_\_\_\_

Date/Time of the disputed situation (in EET, MetaTrader server time) \_\_\_\_\_

Number of contested positions and/or pending orders \_\_\_\_\_

**Brief description of disputed situation****Clause(s) in the current Order Execution Policy which, in the complainant's opinion, have been breached****How you feel this dispute could be settled**

Please accompany this form with a screenshot of your Trading Terminal, if you feel it would further support your claim request

**APPENDIX 2****Type: Non-Trading Operations**

Name \_\_\_\_\_

Surname \_\_\_\_\_

Email \_\_\_\_\_

Account No. \_\_\_\_\_

Date/Time of the disputed situation (in EET, MetaTrader server time) \_\_\_\_\_

**Brief description of disputed situation****Clause(s) in the current Order Execution Policy which, in the complainant's opinion, have been breached****How you feel this dispute could be settled**

Please accompany this form with a screenshot of your Trading Terminal, if you feel it would further support your claim request.