



## Client Complaint's Summary Policy

### Purpose and Scope

The Client Complaints & Disputes Summary Policy (the "Policy") provides I.W.G. International Wealth Group Ltd (hereinafter "IWG" or the "Company") appropriate and efficient procedures for handling any Complaints that may result from the relationship with the Client.

This Policy is meant for use by I.W.G. International Wealth Group Ltd, its Clients/prospective Clients and relevant regulators.

Following the implementation of the Markets in Financial Instruments Directive (MiFID I & MiFID II) (Article 16(2) of Directive 2014/65/EU) and Law 87(I) 2017 IWG is required to establish, implement and maintain effective and transparent procedures for the prompt handling of Complaints received from clients' or potential clients. IWG shall keep a record of the complaint received and the measures taken for their resolution.

The Company shall ensure that their procedures for the handling of Client Complaints are broadly based on the following principles:

- **Independence:** IWG shall seek to provide an impartial service, which is accessible and freely available to the general public, with regards to Complaints against the Company and its services.
- **Transparency:** IWG shall ensure that Clients have all the necessary information about the procedures for handling their Complaints on transactions.
- **Adversarial:** IWG shall ensure that the Complainant, and any other interested party in the Complaint are given an opportunity to interact with the Complaints Manager. The Complaints Manager shall inform such parties about the progress of the investigation and their Complaint.
- **Effectiveness:** IWG shall ensure that Clients will benefit from the advantages of its Client complaint handling procedures, i.e. to provide:
  - Access without being obliged to utilize a professional representative (e.g. an accountant);
  - A procedure which is free of charge;
  - A procedure which ensures minimum bureaucracy, no undue delays and which does not deprive the Client of the protection afforded by any Client protection legislation.

The Complaints Manager of the Company at this time shall be the Company's Compliance Officer, except in situations where the Complaint involves the Compliance Officer, in which case these Complaints will be handled by a member of Senior Management.

### General Procedures

- The Complainant should submit a Complaint through [compliance@interwealthgroup.com](mailto:compliance@interwealthgroup.com) or through the other contact details as these are listed below.
- All Complaints will be acknowledged in writing within two (2) business days of being received.
- An internal register is in place and as soon as the Complaint is received, it is allocated a unique reference number (URN). Following this, the URN is entered into a log. The first two digits of the URN are the code of the CIF regarding the Transaction Reporting System (TRS), the following four digits define the year, and the last four digits denote the number of each complaint serial number (e.g. AA20180001).
- The written acknowledgement sent by the Company to the Complainant will include the Complainant's unique ten-digit reference number, the timeframe in which a response will be given and enclose the complaints handling procedure. The Complainant is informed to use the said URN in all future contact with IWG, the Financial Ombudsman and or CySEC regarding the specific Complaint. The acknowledgement will also provide the name and capacity of the person



dealing with the Complaint and if a resolution is not provided in the initial communication, the letter of acknowledgement will confirm when a further update will be provided.

- If a resolution is not concluded within two (2) months following the submission of the Complaint, the Complainant will be informed in writing of the reasons for the delay and when they should expect completion of the investigation process (this period will not exceed three (3) months from the submission of the Complaint).
- Within fourteen (14) business days of the completion of an investigation a written report must be sent to the Complainant explaining clearly:
  - The outcome of the investigation,
  - The nature and terms of any offer or settlement with the Company is prepared to make in satisfaction of the Complaint
  - The reason for declining to offer a settlement
  - a statement of the fact that the Company will treat the Complaint as settled if the Complainant does not indicate dissatisfaction within one month of receiving the report.
- The Company will inform the Complainant that he/she may refer the Complaint with a copy of the final response to the Cyprus Securities and Exchange Commission for further investigation or the Financial Ombudsman of Cyprus, as defined in Article 4(h) of Directive 2013/11/EU of the European Parliament and the Council on consumer, alternative dispute resolution (ADR) or that the client may be able to take civil action.

## Contact Details

Clients can contact the Complaints Manager as follows:

### By Post:

I.W.G. International Wealth Group Ltd,  
Soboh House,  
377, 28<sup>th</sup> October Street,  
Neapolis  
Limassol 3107,  
Cyprus

Email: [compliance@interwealthgroup.com](mailto:compliance@interwealthgroup.com)

### By Telephone:

Tel: +357 25257001

### The details of the Financial Ombudsman of the Republic of Cyprus:

Address: 13 Lordo Vironos Avenue, 1096 Nicosia, Cyprus  
Fax: + 357 22 660584, +357 22 660118  
Website: [www.financialombudsman.gov.cy](http://www.financialombudsman.gov.cy)

### The details of the Cyprus Securities and Exchange Commission

Address: 19 Diagorou Street,  
1097 Nicosia  
Cyprus

Tel: +357 22506600  
Fax: +357 22506700  
Email: [info@cysec.gov.cy](mailto:info@cysec.gov.cy)

**A FULL COPY OF THE COMPANY'S COMPLAINT & DISPUTE POLICY IS AVAILABLE UPON REQUEST**



**Addendum I**

**Client Complaint Form**

**Complainant Contact Details**

Name \_\_\_\_\_

Address \_\_\_\_\_

Trading Account No \_\_\_\_\_

Tel (Work) \_\_\_\_\_

Tel (Mobile) \_\_\_\_\_

Email \_\_\_\_\_

**Adviser Contact Details**

Name \_\_\_\_\_

Address \_\_\_\_\_

Tel (Work) \_\_\_\_\_

Tel (Mobile) \_\_\_\_\_

Email \_\_\_\_\_

**Complaint Description *(Please indicate relevant dates and positions as well as any previous communication with the Company)***

**Questions**

Have you referred the complaint to any other regulatory body or authority?	Y	N
Have you initiated legal proceedings?	Y	N

**Client Confirmation**

I hereby confirm that the information included in this Complaint Form is accurate and truthful. I understand that the I.W.G. International Wealth Group Ltd Complaint Manager's decision are not binding on the Adviser noted in this complaint.

Signature: \_\_\_\_\_

Date \_\_\_\_\_