



Dispute Resolution & Complaints Procedure

Version: 3.4

Date: July 2018

STO Cyprus

DISPUTE RESOLUTION & COMPLAINTS PROCEDURE

This document is drafted by AFX Capital Market Ltd. (“AFX”, “we”, “us”, “our”) a company registered in Cyprus, authorised and regulated by the Cyprus Securities and Exchange Commission – CySEC with licence no. 119/10 and registration no.253014. This document implements and is compliant with the provisions of Directive DI144-2007-01 for the authorisation and operating conditions of CIFs (“the Directive”)

AFX trading as STO welcomes feedback of any kind and recognises that we will not get everything right all of the time. Should you have reason for concern, please do not hesitate to contact us. In assessing any concerns we will follow the CySEC principles of Treating Customers Fairly and the principle of doing what is right in the individual circumstances.

We will attempt to resolve your complaint within 2 months upon receipt. If we are unable to do this or you remain dissatisfied, the details of your concern will be recorded (if raised by telephone) and passed to a compliance officer to be dealt with. If you are submitting your complaint by email, fax, letter or other form we ask you do so, on our complaints form, which is found in **Appendix 1**.

This is designed to make sure we have all the information we require to log and investigate the complaint from an early stage. We will not refuse complaints raised without using the form, however, if insufficient information is provided we may not start our timeframes for responding causing delay. Our details are as follows:

Post:

AFX Capital Markets Ltd. Trading as STO
Arch. Kyprianou 2 & Ayiou Andreou,
G.Pavlidis Building, 3rd Floor,

3601 Limassol, Cyprus

Email: compliance@stofs.com

Telephone: +357 25262710; By Fax: +357 25 727442

Website (Live Chat): www.stofs.com

Please note that if a complaint refers to the actions of a compliance officer the complaint will be dealt with by another appropriate person – for example their manager or a director should this be necessary.

AFX will respond in writing, within 5 days that the complaint form was filed, acknowledging receipt of your complaint and providing you with a unique reference number which will be used for all future communication you will have with the Financial Ombudsman and/ or with CySEC regarding your complaint.

Following the initial response and the provision of the unique reference number, AFX will respond within two (2) months, from the date of the complaint, telling you whether the complaint has been resolved, or why we need more time to look into it. In any case, our response will be communicated to you in no more than three (3) months from the date of the complaint.

At this point, we would like to inform you that if you are not satisfied with our response, or in the case that a response is not given at all for any reason whatsoever, or in the case that your complaint has been rejected, you have the right to contact the Financial Ombudsman, in case you are eligible to file a complaint with them and ask mediation for possible compensation.

The Financial Ombudsman is an independent service for settling disputes between Cyprus Investment Firms (CIF’s) and their clients.

The Financial Ombudsman should be contacted within

four (4) months after a response has been given to you, or within four (4) months after no response has been provided to you after the response period for AFX has elapsed i.e. three (3) months after the complaint was filed. If the above mentioned periods are not followed, the Financial Ombudsman may not be able to deal with your complaint.

The Financial Ombudsman can be accessed via <http://www.financialombudsman.gov.cy>. In the case where the Financial Ombudsman's response is not accepted by you, AFX would like to inform you that, as a last resort, you may start a civil action in a District Court.

Should you require further information its details are:

Complaints Desk
Cyprus Securities and Exchange Commission 27
Diagorou Street
CY-1097 Nicosia
General: +357 22506600
Fax: +357 22754671
Email: complaints@cysec.gov.cy Website:
http://www.cysec.gov.cy/complaints_cifs_regulated_g_r.aspx (Greek) or
http://www.cysec.gov.cy/complaints_cifs_regulated_e_n.aspx (English)

AFX reviews and monitors this document in an on-going basis having regard to the present Directive and relevant Circulars provided by CySEC

Appendix 1: Complaint Form

REFERENCE (this is for internal use)	AFX-2017-000_
Compliant Date:	
Complainant Full Name:	
Identification:	
Complainant Email:	
Complainant Country	
Complaint Cause (please underline/ highlight)	Choose one of the following: Execution of orders (e.g. delay in execution, re-quotes, slippage, erroneous trades etc.) Investment advice (e.g unsuitable advice) Portfolio management Quality or lack of information provided to the client Terms of contract/fees/charges General admin/customer services (including custody/safekeeping services) Unauthorised business being offered or carried out Issue in relation to investor's withdrawal of investor's funds
Complaint Cause Comments	
Financial Instrument	Choose one of the following categories: FOREX CFDs Other (please specify in comments section below)
Financial Instrument Comments	
Dispute Amount	
Settlement Date	
Record Type NEW/ UPDATED	
Signature:	

¹ [please provide as much detail as possible, including where available – dates, times, names of staff, numbers dialed, messages received or any information you consider relevant. If you refer to any documents or evidence that is not available to AFX Capital Markets Ltd., please also provide copies of such information]

* Please note if the account is in joint names the complaint must be signed by both clients.