

COMPLAINTS SUBMISSION PROCEDURE

At SPA FINANCIAL SERVICES LTD we aim to provide a high standard of investment services in order to serve our clients' interests in the best possible way. However, we understand that despite our best efforts there may be instances where a client may not be entirely satisfied. In such cases, every effort will be made to resolve any outstanding issues in a fair and speedy way. This document outlines our procedure for the submission and handling of complaints.

Procedure

Your complaint can be submitted to SPA FINANCIAL SERVICES LTD in the following ways:

1. By telephone at +357 22 028585
2. By e-mail at the following address: info@spafs.com
3. In writing to the: Compliance Officer, SPA FINANCIAL SERVICES LTD, 30 Karpenisi Str., The Business Forum, 1077 Nicosia, Cyprus

The Compliance Officer will reply immediately acknowledging receipt of your complaint or may also contact you in a few days to ask for explanations or clarifications.

In case the Compliance Officer's investigation is not concluded in 14 days following the submission of your complaint, he shall inform you in writing on the investigation's progress and shall continue to do so periodically until the complaint is resolved.

If you are not satisfied with the outcome of the investigation into your complaint or with the way your complaint is handled by SPA FINANCIAL SERVICES LTD, and wish to further proceed, you are encouraged to submit your complaint, with a copy of our final response to the Financial Ombudsman of the Republic (contact details below).

Financial Ombudsman of the Republic

Address:

13 Lord Byron Avenue, 1096 Nicosia

Phone: 22848900 (main number)

Facsimile (Fax): 22660584, 22660118

E-mail:

- Complaints: complaints@financialombudsman.gov.cy
- Financial Ombudsman: fin.ombudsman@financialombudsman.gov.cy
- Website: www.financialombudsman.gov.cy

You may also refer the matter to the Cyprus Securities and Exchange Commission (CySEC). It is stressed, however that CySEC has no restitution powers and therefore any complaints submitted to CYSEC are taken into consideration in the performance of its supervisory mandate.