JFD GROUP LTD

(Regulated by the Cyprus Securities & Exchange Commission with registration number 150/11)

COMPLAINTS HANDLING POLICY

DECEMBER 2025

ADDRESS
JFD Group Ltd.
Kakos Premier Tower
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WEB
support@jfdeurope.com
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COMPLAINTS HANDLING POLICY

A. GENERAL

JFD Group Ltd (hereinafter referred to as the "Company" or "JFD") has established effective and transparent procedures to ensure the fair, timely, and efficient handling of any concerns, queries, issues, or complaints submitted by its retail or professional clients. The Company maintains comprehensive records of each complaint received, including the steps taken and measures implemented for its resolution.

The Company's primary objective is to consistently provide a high standard of service to all clients. While it is recognised that, on occasion, errors or misunderstandings may arise, JFD is committed to addressing all concerns and complaints constructively, in a fair and supportive manner, and in accordance with the applicable complaints handling requirements of the Cyprus Securities and Exchange Commission ("CySEC") and relevant legislation.

In line with this commitment, JFD has implemented clear and transparent internal processes to ensure that complaints from both existing and prospective clients are managed promptly and effectively. All complaints are recorded in detail, together with the remedial actions undertaken, ensuring full compliance with applicable laws, regulations, and CySEC's complaints management framework.

B. TYPES OF COMPLAINTS ADDRESSED

In accordance with this Policy, JFD will review and investigate any written expression of dissatisfaction submitted by a client in relation to the investment and/or ancillary services provided by the Company. Complaints may arise for a variety of reasons, including but not limited to the following:

a) Allegations of maladministration by the Company, which may relate to:
i. Issues concerning the client's account(s), transactions, or contracts executed and/or recorded therein;
ii. The client's rights under the *Client Agreement/Terms and Conditions*, the *Client Categorisation Policy*, the *Order Execution Policy*, the *Conflicts of Interest Policy*, the *Anti-Money Laundering Policy*, or the *Investor Compensation Fund*, as outlined in the "Legal Documents" section of the Company's website.

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b) Refusal or delay in providing requested information relating to the client's account, transactions, or contracts.

c) Dissatisfaction with the adequacy, quality, or timeliness of the Company's response to a client enquiry.

C. CONCERNS/QUERIES

All complaints, disputes, or disagreements between the client and the Company shall be handled in the Republic of Cyprus, in line with this Complaints Handling Policy. By engaging with the Company, clients acknowledge and agree that JFD has the right to address and resolve such matters in accordance with the procedures outlined herein.

Concern/Query: Any request from a client seeking information, providing feedback and/or requesting clarification about any activity or service provided by JFD.

If you are dissatisfied with the service provided by JFD, or if you have a query or concern regarding your account or activity with the Company, please contact our Customer Support as soon as possible by phone at +357 25878530, Live chat or email to support@jfdeurope.com.

Clients' concerns are initially handled by the Customer Support Department which determines whether the concern can be resolved immediately or if it will require further investigation. The Company will carry out an impartial review of the issue with a view to understanding what did or did not happen and assess whether JFD has acted fairly within its rights and has met its contractual and other obligations. The Customer Support Department should make all best efforts to ensure that in case the concern/query is being of such a nature that can be resolved immediately (within 5 business days), to do so, so that the client will be satisfied and will not have to pursue the filing of a formal complaint.

If the client is not satisfied with the response to the concern received, then the client may raise this further with the Compliance Department following the process indicated in the section below.

D. OFFICIAL WRITTEN COMPLAINT – HOW TO MAKE A FORMAL COMPLAINT

The clients willing to submit a complaint are advised to send their complaint to the Company via email to complaints@jfdeurope.com.

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All official complaints will be handled by the Compliance Officer, or by a member of the Compliance Department, and any action taken shall be in accordance with the procedures described below.

A complaint will be recorded as an official written complaint by the Company and will be handled as such only if it is duly submitted with all the required information as described below.

Without prejudice to the generality of the above, the Company shall treat each case separately on a case-by-case basis and categorize the matter as complaint as long as adequate particulars of conduct being alleged against the Company can be identified.

Once a complaint is received, the Company will collect and review all relevant information and evidence. To ensure that the matter can be assessed efficiently and fairly, clients are encouraged to provide the following details, where applicable:

(a) the client's name and surname

(b) their account number;

(c) the date on which the issue first occurred;

(d) a concise description of the complaint;

(e) the disputed amount and currency (if any); and

(f) any supporting documents or materials that could assist in resolving the matter.

Upon receiving the complaint, the Company must register the complaint directly in an internal register, giving it a unique reference number. The employee receiving the complaint confirms within 5 (five) days the receiving of the complaint and communicates to the client the **unique reference number** assigned to the case.

The reference number should be used in all subsequent correspondence with the Company and, if applicable, with the Financial Ombudsman, CySEC, or any approved dispute resolution body.

Our acknowledgement response will contain details of our Complaints Handling Procedure.

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Upon completion of the investigation, a response is prepared by the Compliance Department, brought to Senior Management's attention and Senior Management gives the final approval for the formal response to the client and the actions and measures to be taken.

E. RESPONSE PERIOD

The Company shall provide a final response/outcome to the complainant within two (2) months from the date the complaint was received. If the Company is unable to respond within two months, it informs the complainant of the reasons for the delay and indicates when the Company's investigation is likely to be completed. If needed, during the investigation of the complaint, the Company informs the Complainant of the handling process of his complaint. According to applicable regulatory obligations, the Company has an additional month to resolve a Complaint, if it is unable to resolve a Complaint within two (2) months (i.e. a Final Response should be issued within maximum three (3) months from the day of the Complaint).

In addition, if the Client remains dissatisfied with the final response of the Company or in case of no final response within the three (3) months' time-frame, the client is entitled to take his complaint to the Financial Ombudsman of Cyprus or alternatively by submitting his complaint to CySEC.

Note however that the Financial Ombudsman of Cyprus has the right to refuse the examination of any complaint if, amongst other reasons, that complaint has been submitted to the Financial Ombudsman twenty-two (22) months from the date on which the Client has become aware, or ought to reasonably be aware (according to the opinion of the Financial Ombudsman) of the action or omission of the financial undertaking or of the fact that he had a basis for the submission of a complaint. Also note that if a client is a legal entity, trust or otherwise, different provisions may apply and you should become aware of the provisions of the relevant law.

Contact Details of the Financial Ombudsman of the Republic of Cyprus

- **Address:** 13 Lord Byron Avenue, 1096 Nicosia, Cyprus
- **Telephone:** +357 22848900
- **Fax:** +357 22660584, +357 22660118
- **Email (Complaints):** complaints@financialombudsman.gov.cy
- **Website:** www.financialombudsman.gov.cy

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Please ensure that you copy your complaint's unique reference number when you address your formal complaint to the Financial Ombudsman.

If you are not satisfied with our final response to your complaint, you may refer the matter to the Cyprus Securities and Exchange Commission CySEC electronically.

Contact Details of the Cyprus Securities and Exchange Commission:

- **Website**: www.cysec.gov.cy
- **Email:** info@cysec.gov.cy
- **Address**: 19 Diagorou Street, 1097 Nicosia
- **Telephone:** 357 22506600
- **Fax:** 357 22506700

When complaining, a Client should, at all times, use the unique complaint number that will be provided in the acknowledgment and/or response by JFD.

In the event that you are not satisfied by the decision of the Financial Ombudsman, you may take civil action as an option of last resort.

F. MONITORING OF COMPLAINTS

In line with CySEC requirements, the Company maintains detailed records of all complaints. An internal Complaints Register is kept, documenting all relevant information and tracking the progress and outcome of each case.

The Company is obligated to provide CySEC with regular updates on complaints received from clients, and such reporting is submitted on a **monthly basis**.

At least once a year, the Company provides Senior Management with a comprehensive report covering complaints submitted to CySEC, together with any remedial measures taken or planned to address identified deficiencies or weaknesses.

All personal information obtained through the complaints process is treated as strictly confidential. No data is shared with third parties, and the Company ensures full compliance with the **General Data Protection Regulation (EU) 2016/679 ("GDPR")**, as amended or replaced from time to time.

The Company provides regular training to employees involved in client-facing functions to ensure that complaints are correctly identified, escalated, and managed in accordance with this Policy. Training sessions are documented and refreshed periodically to maintain staff awareness and compliance with regulatory requirements.

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G. RECORD KEEPING OF COMPLAINTS RECEIVED

The Company shall maintain all complaints for a minimum period of seven years after the execution of the complaint and/or termination of the business relationship with the Client. The responsible departments shall be the Compliance Department and the Customer Support Department

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