

# COMPLAINTS HANDLING POLICY

**Version 1 – April 2024**

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**AXON SECURITIES S.A.**

Authorised and Regulated by the Hellenic Capital Market Commission under license No. 32/315/26.10.2004

Registered Address: 48, Stadiou Street, 2<sup>nd</sup> floor, 105 64 Athens, Greece

Email: [support@naga.eu](mailto:support@naga.eu) | Tel: +30 2103007644 | Website: [www.naga.eu](http://www.naga.eu)

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## 1. SUMMARY INFORMATION

This Complaints Management Policy (hereafter referred to as the “**Policy**”) defines the principles that apply to AXON SECURITIES S.A., a company incorporated in Greece with Registration Number: 000708201000, authorized and regulated by the Hellenic Capital Market Commission (hereafter referred to as “**HCMC**”) as a Greek Investment Services Firm with license number 32/315/26.10.2004 to offer certain investment and ancillary services subject to the provisions of the Law of 4514/2018 “Markets for financial instruments and other provisions” (hereafter referred to as the “**AXON**” and/or the “**Company**”).

The Company’s registered address is at 48 Stadiou Street, 105 64 Athens, Greece.

**NAGA.eu** is the Company’s domain/website, which is owned by Naga Technology GmbH, however, is independently and exclusively operated by Axon Securities S.A.

**NAGA** is a trade name and trademark under the NAGA Group AG, a German based FinTech company publicly listed on the Frankfurt Stock Exchange. Exclusive rights for the use of the said trade name and trademark, in the territory of Greece, are exclusively granted to Axon Securities S.A.

## 2. INTRODUCTION

The purpose of this Policy is to define the arrangements employed by AXON for the reasonable and prompt handling of complaints, as well as to ensure that the Company is acting in accordance with the relevant laws and regulations both to ensure protection of its clients and/or potential clients and also adherence to its legal and/or regulatory obligations. The Company will act in accordance with the best interests of its clients and will ensure it has appropriate systems and controls in place so that its clients, including potential clients, have access to adequate complaints handling and redress mechanisms that are accessible, independent, fair, accountable, timely and efficient.

### 3. GENERAL PRINCIPLES

This Policy shall follow the undernoted principles:

- fair treatment of clients;
- complaints raised by clients are dealt with courtesy and on time;
- clients are fully informed of avenues to escalate their complaints and their rights to alternate remedy if they are not fully satisfied with AXON's response to their complaints;
- the Company will treat all complaints efficiently and fairly as they can damage AXON's reputation and business if handled otherwise;
- the Company's employees must work in good faith and without prejudice to the interests of the clients.
- The Company's official language is the Greek and English languages, and its employees will put their best abilities to assist with a complaint raised by the clients in Greek or English languages, for the clients' convenience, the Company may communicate with clients in the same language of reference of the complaint by the client or in the language in which the client communicates with the Company in the context of providing them with its services.

Considering the above, the Company shall:

- establish and maintain a complaints management procedure for clients or potential clients, which shall provide clear, accurate and up-to-date information about the complaints-handling process;
- publish the details of the process to be followed when handling a complaint, including information about the complaints management procedure and the contact details of the complaints management function, to be provided to clients or potential clients, on request, or when acknowledging a complaint;
- establish a complaints management function within its Compliance Department of the Company which enables complaints to be investigated, analysed and resolved;
- communicate to clients in plain language that is clearly understood and provide a response to the compliant without any unnecessary delay;
- explain to the client or a potential client, AXON's position on the complaint and set out

the client's or potential client's options, where relevant, that they may be able to take civil action;

- provide information on complaints and complaints-handling to the Hellenic Capital Market Commission (hereafter referred to as "HCMC");
- ensure its complaints management function shall analyse complaints and complaint-handling data to ensure that they identify and address any risks or issues.

#### **4. COLLECTION OF INFORMATION**

In order to investigate and resolve potential complaints received, AXON shall collect and record the following information:

- Date of receipt of the complaint;
- Details of the client submitting the complaint, including:
  - Name and Surname of the Complainant;
  - The email the Complainant used to register with the Company (Registered Email)
  - The number of the Complainant's Trading Account which the complaint refers to (Account No.)
  - National Identification and/or Passport Number;
  - Country of Residence.
- Content and reason of the complaint, including:
  - The complaint cause;
  - The financial instrument involved;
  - The disputed amount;
  - The settlement date.
- Service/department to which the complaint relates to;
- Details of AXON's employee responsible for the service(s) rendered to the client;
- Magnitude of the damage which the client claims to have suffered and/or which can be presumed to have suffered on the basis of the contents of the complaint;
- Date of AXON's answer;
- The content of AXON's written response to the complaint lodged;
- Reference to any correspondence exchanged between AXON and the client which should

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be attached to AXON's file for internal recordkeeping requirements.

## **5. REGISTERING A COMPLAINT**

If for any reason the client is not entirely satisfied with any aspect of AXON's services, the client shall inform AXON as soon as possible orally over the telephone, online by using and completing the Company's form ("Complaint Form"), via email at [complaints@naga.eu](mailto:complaints@naga.eu), or via post at: AXON SECURITIES S.A., 48 Stadiou Street, 105 64 Athens, Greece.

Complaints made by clients will not be considered and assessed unless the Complaint Form is duly completed with all the required information. Any further supporting documentation for the Client's claims may be sent along with the Complaint Form. If the client has any supporting and/or documentary evidence to support the complaint, the client should ensure that such information is collected and forwarded to AXON using one of the above stated methods.

Where a complaint is made by the client through a legal representative (e.g., an attorney, public legal counsellor) the Complaint Form and the required documentation shall be accompanied by a duly executed written authorization of the legal representative to represent or act on the behalf of the client (i.e., Power of Attorney).

## **6. COMPLAINT HANDLING**

Upon receipt of the complaint, AXON shall assess whether there are grounds for lodging a complaint under its policies and procedures acknowledged also by the client and all applicable laws and regulations. AXON shall seek to gather and investigate, free of charge, all the relevant evidence and information regarding the complaint and identify possible conflicts of interest in order to mitigate them and ensure the complaint's fair redressal.

For an investigation to be fair, it shall be thorough, although AXON aims to conclude cases as quickly as possible, without undue delays, and always within the timeframes of the law, as follows:

- within two working (2) days, the client shall receive confirmation of receipt of its complaint and the Compliance Officer is responsible for handling an internal complaint register

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(hereafter referred to as the “Complaints Register”). Upon receiving the complaint, the Compliance Officer shall register the complaint on the Complaint Register, giving it a Unique Reference Number (URN);

- the URN is communicated to the complainant by the Compliance Officer who informs the complainant that he should use the said reference number in all future communication and correspondence with the Firm, the Financial Ombudsman and/or the HCMC regarding the specific complaint;
- during the investigation of the complaint, AXON shall inform the client of the complaint handling process;
- Within four (4) weeks of receipt, the Company shall send the client a Final Response. If the investigation is not concluded within four (4) weeks of receipt of the complaint, AXON will inform the client of the reasons for the further delay, indicating when it is likely to provide the client with its final response. This period shall not exceed the period of eight (8) weeks from the day of submission of the complaint;
- during complaint’s investigation, AXON will update the client regarding the handling process of their complaint, and one of the AXON’s officers may contact them directly to obtain further clarifications and information relating to their complaint, if needed.
- In such circumstances, AXON will require client’s full cooperation for the investigation and possible resolution of their complaint.
- If upon the submission of a complaint, the client fails or omit to establish further communication with the officers of the Company and/or remain unresponsive to the Company’s attempts to contact them for a period of 3 (three) months from the date of the submission of the complaint, then AXON shall consider the matter as closed due to the lack of cooperation or communication demonstrated.
- once a Complaint’s investigation is completed, a Final Response shall be issued to the client with the investigation’s outcome(s) together with any required explanations and any remedy measures the Company intends to take. Upon sending the final response, the client shall be given a period of eight (8) weeks to respond. If a response is not received within eight (8) weeks, then the Company shall not be obliged to take the complaint/grievance further unless further correspondence is received from the client

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indicating that he/she is still dissatisfied.

The procedure described herein is applicable for complaints that are submitted within **one (1) year from the facts to which the complaints refer**. The Company shall **not** examine complaints submitted after the lapse of the aforementioned time limit.

It is understood that Clients' right to take legal action remains unaffected by the existence or use of any complaint's procedures referred to above. In addition, Clients have the right to address their complaints to a competent alternative dispute resolution entity, as defined in Article 4(h) of Directive 2013/11/EU of the European Parliament and the Council on consumer ADR as well as in Article 102 of the Law 4512/2018. Indicatively, and with respect to Investment Firms based in Greece, complaints may be addressed to the Hellenic Financial Ombudsman 1 month after the outcome of the resolution of the Company's complaint, provided that the client has not been satisfied with the Company's final decision.

**The Hellenic Financial Ombudsman:**

Address: Massalias 1, 10680, Athens

Telephone: +30 21 0646 0612

Website: <https://hobis.gr/en>

Apart of the above, the client may submit their complaint directly to the regulator (i.e., HCMC) or resolve the matter by court.

In order to file a complaint with the Hellenic Capital Market Commission client should read the Instructions for Completing the Complaint Form and then complete and send the Complaint Form to [info@cmc.gov.gr](mailto:info@cmc.gov.gr). All the relevant information as well as the Complaint Form can be found at [http://www.hcmc.gr/en\\_US/web/portal/supkat](http://www.hcmc.gr/en_US/web/portal/supkat) and [http://www.hcmc.gr/aweb/files/kataggelies/Complaint%20form\\_English.pdf](http://www.hcmc.gr/aweb/files/kataggelies/Complaint%20form_English.pdf) respectively.



## **7. INTERNAL ANALYSIS AND CORRECTION OF COMPLAINTS**

It shall be the responsibility of the Company's Compliance Department to analyse, on an ongoing basis, complaint-handling data to ensure that recurring or systemic problems and potential legal and operational risks are identified and addressed. Such analysis shall include the causes of complaints so as to identify root causes common to such types of complaints. The root causes shall then be considered to determine whether they may affect other processes or products, including those not directly complained of. AXON shall ensure that root causes are corrected, where reasonable.

## **8. RECORD KEEPING**

AXON maintains records of all complaints as well as all related details for a minimum period of five (5) years after termination of the business relationship with its clients and in accordance with the applicable record keeping legislative requirements as these may be amended from time to time.

## **9. REVIEW AND MONITORING OF THIS POLICY**

The Compliance Function monitors the effectiveness of this Policy and complaint management procedures as part of its compliance monitoring program. This Policy is reviewed periodically and no less than annually, to ensure that it continues to meet AXON's regulatory and compliance obligations.

## **COMPLAINTS FORM**

This is the form you need to fill in if you wish to submit your complaint to AXON SECURITIES S.A. (the “**Company**”). Complete, up to date as well as accurate information is required to be provided to the Company for the proper investigation and evaluation of your complaint.

Please note that the below Complaint Form is only indicative and not exhaustive. The Company may request further information and/or clarifications and/or evidence as regards to your complaint.

Date:

### **Client information**

Name:

Surname:

ID or Passport Number:

Legal Entity Name:

*(In case the Client is a legal person)*

Country of Nationality *(in case of Natural Person)* **or** Incorporation Country *(In case of Legal Person)*:

Registered Email:

Account Trading Number:

### **Contact details of the client**

Postal Address:

City/Province:

Code:

Country:

Telephone Number:

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Email:

*(Please advise your most convenient method of communication)*

**Details of the complaint**

Date when the Complaint was created:

Description of the Complaint:

*(use a separate sheet if necessary)*

Disputed/Claimed Amount (currency & amount):