



Complaints Handling Policy Clients Procedure

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ZERO21 LTD

Company Registration Number: HE447449

Authorized by CySEC - CASP Registration Number 016/24

T: +357 821 021, E: complaints@zero21.eu



1. General

1.1 Objective

The purpose of the Complaints Handling Policy is to set out the procedures to be followed and the appropriate actions to be taken by Zero21 Ltd (the Company), in the cases where a complaint is received from any of the Company's Clients.

The aim of the procedures established in the current Policy is to deliver a consistent, high-quality and accountable response to each official complaint, regardless of the subject matter.

1.2 Legislation

The complaints management procedures for the handling of complaints received by the Company, as described in this Policy, are established in compliance with CySEC Circular C338, and the European Banking Authority ("EBA") and European Securities and Markets Authority ("ESMA") Guidelines on Complaints – Handling for Securities and Banking Sectors (JC 2019 35), with the aim to establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling and resolution of complaints received by legal entities in respect of its licensed activities.

1.3 Definitions

"Complainant" means any person, natural or legal, who is eligible for lodging a Complaint to the Company and who has already lodged a Complaint.

"Complaint" means a statement of dissatisfaction addressed to the Company by a Complainant relating to the provision of investment services.

2. Submitting a Complaint

A complainant shall complete the Complaint Form provided by the Company (available in Appendix 1 of this Policy). Once completed, it should be sent either:

1. as a hard copy along with a copy of the complainant's identification document and any additional documentation that would be relevant to the complaint, to the Company's head offices which are situated at 19 Spyrou Kyprianou, Silver House, 4th floor, 3070 Limassol, Cyprus
2. by e-mail to complaints@zero21.eu

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3. Handling of your Complaint

1. The Company shall confirm to you via email, within five (5) business days from the receipt of the complaint, that the complaint is under investigation and shall provide you with a unique reference number assigned to the specific complaint.
2. The unique reference number should be used in all future contacts with the Company and/or the Cyprus Securities and Exchange Commission regarding the specific complaint.
3. In the case that the complaint is in a language other than English or Greek, a true translation must be obtained.
4. We will keep you updated on the development and the handling process of your complaint. Where further details on the complaint are considered needed a member of the investigation team shall contact you to discuss the matter further.
5. The Company shall deliver its final solution on the case no later than two (2) months from the receipt of the complaint. The findings and proposed solutions shall be communicated to you in a written form, explaining in detail the Company's stance on the specific case.
6. If a complaint cannot be resolved within the specified period of two (2) months, due to its complicated nature or where further clarification of circumstances is required, the Company shall inform you of the reasons for the delay and shall indicate the period within which is expected the investigation to be completed. This period cannot exceed three (3) months from the submission of the initial complaint.
7. The Company has the right to refrain from reviewing a complaint when:
 - a. The information of the complaint prevents the Company from identifying the applicant's identity.
 - b. The complaint includes offensive language directed either to the Company or an employee of the Company.

4. Complaint cases not covered under the current Policy

The present Complaints Handling Policy shall not apply where the Company receives a complaint about:

- activities which fall outside of those supervised by Competent Authorities; or
- the activities of another entity for which the Company has no legal or regulatory responsibility (and where those activities form the substance of the complaint).

However, the Company shall respond, where possible, explaining the Company's position on the complaint and/or, where appropriate, giving details of the firm or other financial institution responsible for handling the complaint.

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