



Complaints Handling Procedure

Version 1.0 – November 2025

By accepting this Complaints Handling Procedure, you acknowledge and agree that the official and legally binding language of the Company is English. In the event of any discrepancy or inconsistency between the English version of any document, information, or communication and a version in any other language, the English version shall prevail.

INTRODUCTION

RIVER PRIME EUROPE LTD (“the Company”) is a limited company incorporated in Cyprus, offering its clients various investment and ancillary services, regulated by Cyprus Securities and Exchange Commission (the “Commission” or “CySEC”). It is therefore a Cyprus Investment Firm (a “CIF”) within the meaning of the Investment Services and Activities and Regulated Markets Law of 2017, L.87(I)/2017.

The Company, aiming to provide high quality services and serving the interests of its clients’ (“Clients”, “you”) in the best possible way, has adopted the following Complaints Handling Procedure in order to ensure a fair and quick process for handling complaints that may arise from the service offering of the Company.

The Company owns, operates and is responsible for the website www.riverprime.eu/en/.

You may use the below details to contact the Company:

- **Address:** 4 Evagora Papachristoforou Street, Agias Zonis, Themis Court no.1, 3030, Limassol, Cyprus.
- **Phone:** +357 25 311 693
- **Email:** compliance@riverprime.eu

Definitions:

«**complainant**» means any person, natural or legal, which 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.

COMPLAINT SUBMISSION

In the event that a client has a Complaint related to the dealings or services with the Company, then the Client may submit the Complaint using the below methods:

- a) Download, complete and send the Complaint form ***provided in Appendix I*** via email to compliance@riverprime.eu along with any attachments that the Client may deem necessary as evidence for the Complaint;
- b) Download, complete and send the Complaint form ***provided in Appendix I*** via post to **4 Evagora Papachristoforou Str., Agias Zonis, Themis Court no.1, 3030, Limassol, Cyprus**, along with any other documents that the Client may deem necessary as evidence for the complaint;
- c) **By telephone**, by contacting the Company at +357 25 311 693.
- d) In this case, the Client's details and a brief summary of the issue will be recorded by a Company officer, and the Client will be requested to subsequently complete and submit the official Complaint Form (Appendix I) in writing or by email, so that the Complaint can be registered and investigated in accordance with CySEC requirements.

Details required by the form or in the email can be but not limited to:

- a) full name;
- b) date;
- c) ID/passport number;
- d) account number;
- e) contact information;
- f) category of the complaint (deposit, withdrawal, order execution, other);
- g) amount (if any);
- h) short description mentioning the nature of the complaint including vital information (example: if the complaint is about an order or withdrawal request include the transaction ID).

NOTES:

- Anonymous Complaints will not be treated.
- Sending an email without the attached form or to any email address other than compliance@riverprime.eu will result to a response requesting you to fulfill the form and/or resubmit to the correct email.
- Sending an incomplete form will result in a response by the Company requesting a duly completed form. The Client should respond within two (2) weeks for the Complaint to be registered.

Upon official receipt of a complete Client Complaint, a written acknowledgment via email is sent to the Client within five (5) days from the time the Complaint was made, confirming that the Company has received and is taking action to resolve the Complaint along with a Unique Reference Number to be used in all future communications with the Company or any interested or relevant party.

COMPLAINTS HANDLING

Complaints are received by Company's Compliance Officer's department and are assigned to an officer for investigation. The officer shall communicate the Complaint details to all relevant departments' heads within the Company and coordinate required actions to investigate the circumstances surrounding Client's Complaint and lead to its resolution without undue delay.

The investigation is concluded within two (2) months from the day of the acknowledgement of the Complaint and the results are communicated to the Client. Investigation results can be either Complaint resolution or further investigation needed. In the event the investigation requires more time the Company will send a written communication via email to the Complainant that additional time is needed for investigation and the reason. In any event the Company will issue a final response within a timeframe that does not exceed three (3) months from the day of acknowledgment receipt of the Complaint.

During the investigation process, the Client may request to be updated at any time of the Complaint status and progress in addition to the handling process update it receives from the Company. Also, the assigned officer may communicate directly via email or phone with the Complainant in order to obtain, where needed, further clarifications and information relating to the Complaint. The Company requires the Client's full cooperation in order to expedite the investigation and possible resolution of the Complaint. Please note that the Company shall consider your Complaint as closed and cease the relevant investigation in case you fail to respond to the officer within the period of three (3) months from the date of the submission of your Complaint.

FINAL RESPONSE

Upon completion of the investigation, the Client shall receive a final response from the Company, which will include the Company's decision, a summary of the investigation findings, and any corrective or remedial actions, if applicable.

In the event that the Client is not satisfied with the Company's response, the Client retains the right to refer the complaint to the Financial Ombudsman of the Republic of Cyprus and/or to maintain the complaint with the Cyprus Securities and Exchange Commission (CySEC). Please note, however, that CySEC does not have restitution powers and therefore does not investigate individual complaints.

It is understood that the Client's right to initiate legal proceedings against the Company in respect of the complaint remains unaffected by the procedures described above.

Relevant Authorities Contact Details:

Financial Ombudsman of the Republic of Cyprus:

- Website: financialombudsman.org.cy
- Email: complaints@financialombudsman.gov.cy
- Postal Address: P.O. BOX: 25735, 1311 Nicosia, Cyprus
- Telephone: +35722848900
- Fax: +35722660584

CySEC:

- Website: cysec.gov.cy/en-GB/investor-protection/how-to-complain/
- Email: info@cysec.gov.cy
- Postal Address: P.O BOX 24996, 1306 Nicosia
- Telephone: +357 22506600
- Fax: +357 22506700

RECORD KEEPING

As soon as the Company receives the Complaint form, the Company must register it in an internal register with an appropriate manner, as well as for easy reference and retrieval, the Company maintains the below information in its records for a minimum period of 5 (five) years:

- Complaint Unique Reference Number;
- Client account ID;
- date of Complaint official submission to the Company;
- assigned officer;
- Complaint details;
- Complaint investigation process;
 - a) escalation / assignment to a different department;
 - b) date of escalation / assignment;
 - c) assigned officer;
 - d) investigation process;
 - e) investigation results;
 - f) date of response;
- investigation results and actions;
- date of response.

REPORTING OBLIGATIONS

The Company reports to CySEC at the end of each month of all Complaints received during the reporting month. Additionally, the Company reports on the status of Complaints whether it has been resolved or not and if necessary, on the actions taken by the Company.

UPDATES

The Company will perform a periodical review of this Policy, at least once a year and whenever material changes to the Company's operations take place. The updated version of this Complaints Handling Procedure will be always available on the Company's website.

APPENDIX I

RIVER PRIME EUROPE LTD

SUGGESTIONS AND COMPLAINTS FORM

Full Name:	ID / Passport No.:	
Home Telephone:	Account No. (UIN):	
Mobile Phone:	Email:	
Address:		
Post Code:	City:	Country:

Please select related area from the below:

- Deposit ☐
 Withdrawal ☐
 Order Execution ☐
 Terms of Contract/Fees/Charges ☐
 General Admin/Customer Services ☐
 Other ☐ Please provide more details: _____

Disputed Amount (in EUR): _____

Please provide a short description of the Complaint / Suggestion:

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Is there any other information essential to your Complaint / Suggestion? (Example: if a complaint is about a trade order or withdrawal request include the relevant transaction ID.)

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Any Attachments / Evidence? YES ☐ NO ☐

Signature: _____

Date: _____