



Gate Securities (Cyprus) Ltd

ex. Sheer Markets (Cyprus) Ltd

COMPLAINTS HANDLING PROCEDURE

September 2026

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1. COMPANY INFORMATION

- 1.1. Gate Securities (Cyprus) Ltd (hereafter "the Company" or "Gate Securities") is a Cyprus Investment Firm ("CIF") authorized and regulated by the Cyprus Securities and Exchange Commission ("CySEC") under License Number 395/20.
- 1.2. The Company operates in full compliance with the following applicable legal, regulatory, and supervisory frameworks:
 - The Investment Services and Activities and Regulated Markets Law of 2017 (Law 87(I)/2017), as amended.
 - Commission Delegated Regulation (EU) 2017/565 supplementing MiFID II.
 - CySEC Circular C338 (Guidelines on Complaints-Handling for the Investment Sector).
 - CySEC Circular C198 (Reporting of Complaints Handling).
 - Joint EIOPA and ESMA Guidelines on Complaints-Handling for the Securities and Banking Sectors (ESMA/2014/937).
 - The Establishment and Operation of the Financial Ombudsman of the Republic of Cyprus Law of 2010 (Law 84(I)/2010), as amended.

2. INTRODUCTION

- 2.1. The Company has adopted this Complaints Procedure in order to ensure a fair and quick process for handling complaints that may arise from our relationship.
- 2.2. Under the Complaint handling rules, the Company shall deal with any expression of dissatisfaction regarding any financial services activity provided or withheld by the Company.
- 2.3. The Company considers it important and essential to pay proper attention to each and every complaint made, irrelevant to the subject matter of the complaint.

3. TERMINOLOGY

Complaint: A statement of dissatisfaction addressed to the Company by a natural or legal person relating to the provision or failure to provide an investment service, ancillary service, or financial instrument. Complaints may be submitted in writing or verbally (written confirmation will be requested for verbal submissions).

Complainant: Any client or potential client who is eligible to have a complaint considered by the Company and who has lodged a complaint.

4. SUBMISSION OF COMPLAINTS

- 4.1 Clients may submit their complaint in writing and address it to the Head of Compliance of the Company who is authorized to handle and investigate complaints that may be submitted.
- 4.2 Clients are encouraged to use the Complaints Form attached herein and submit it electronically at the following address along with a copy of any additional documentation that would be relevant to the complaint.
 - Postal Address: 331, 28th October Avenue, Lido House Block 2, Unit 365, 3106, Limassol, Cyprus.
 - Attention to: Compliance Officer
 - By phone: (+357) 25057630
 - By email: compliance@gate-securities.eu
- 4.3 Clients can submit their complaints to the Company free of charge.

5. ACKNOWLEDGING COMPLAINTS

- 5.1 The Complaints Management Function will acknowledge receipt of the complaint in writing (or durable medium) within five (5) business days of receipt.
- 5.2 Upon registration in the internal Complaints Register, the complaint will be issued a mandatory 10-digit Unique Reference Number structured as follows:
- Digits 1–2: The 2-digit Transaction Reporting System (TRS) Code assigned to the Company by CySEC.
 - Digits 3–6: The 4-digit Year during which the complaint was submitted (e.g., 2026).
 - Digits 7–10: A unique 4-digit sequential identification number allocated to the complaint (e.g., 0001).
- 5.3 The Complainant must use this 10-digit Unique Reference Number in all future communications regarding the complaint with the Company, CySEC, and/or the Financial Ombudsman of the Republic of Cyprus.

6. HANDLING COMPLAINTS

- 6.1 Once the Company has acknowledged receipt of a complaint, the Company will review it carefully, investigate the circumstances surrounding the complaint and will try to resolve it without undue delay.
- 6.2 The Company shall make every effort to investigate the complaint and provide the Complainant with the outcome of our investigation within two (2) months of the date of the submitted complaint to the Company. During the investigation process the Company will keep the Complainant updated on the handling process of their complaint. One of our officers may contact the Complainant directly (including communication by email or phone) in order to obtain further clarifications and information in relation to the complaint. The Company will require the Complainants to be fully cooperative in order to expedite the investigation and resolution of their complaint.
- 6.3 In the event that the complaint requires further investigation, and the Company cannot resolve it within two (2) months, the Company will issue a holding response in writing or another durable medium. When a holding response is sent, it will indicate the reasons for the delay and when the Company's investigation is likely to be completed. In any event, the Company shall provide the Complainant with the outcome of our investigation no later than three (3) months from the period of the submission of the complaint.

7. FINAL DECISION

- 7.1 When the Company's investigation is concluded, the Company will inform the Complainant of the outcome, together with an explanation and any remedy measures the Company intends to take (if applicable).
- 7.2 In case our final decision does not fully satisfy the Complainants demands, the Company shall explain to the Complainant the Company's position on the complaint and inform Complainants about their options, that may be able to refer their complaint to an alternative dispute resolution entity, the Financial Ombudsman, CySEC or the relevant Courts.
- 7.3 In cases refer to paragraph 6.2. above, the Complainants may check with the office of the Financial Ombudsman of the Republic of Cyprus, to file a complaint and seek mediation for possible compensation. It is important that you contact the Financial Ombudsman of the Republic of Cyprus within four (4) months of receiving a final response from the Company,

otherwise the Financial Ombudsman of the Republic of Cyprus may not be able to deal with the complaint.

7.4 In the event that the Company was unable to provide the complainant with a final response within the three (3) month time period specified above, the Complainant may again contact the office of the Financial Ombudsman of the Republic of Cyprus no later than four

7.5 (4) months after the date when the Company ought to have provided the Complainant with the final decision.

7.6 Contact Details of the Financial Ombudsman of the Republic of Cyprus:

- Website: <http://www.financialombudsman.gov.cy>
- Email: complaints@financialombudsman.gov.cy
- Postal Address: P.O. BOX: 25735, 1311 Nicosia, Cyprus
- Telephone: +357 22848900
- Fax: +357 22660584,

7.7. It is understood that complainants have the right to take legal action, which remains unaffected by the existence or use of any complaint's procedures referred to above.

7.8. The complainant may disclose his complaint to the Cyprus Securities and Exchange Commission. However, he should note that the Cyprus Securities and Exchange Commission does not have restitution powers and therefore does not investigate individual complaints.

7.9. Contact Details of the Cyprus Securities and Exchange Commission:

- Website: <http://www.cysec.gov.cy>
- General email: info@cysec.gov.cy
- Postal address: P.O. BOX 24996, 1306 Nicosia, Cyprus
- Telephone: +357 22 506600
- Fax: +357 22 506700

Date: 03.09.2026
te: 12.12.2025

COMPLAINTS FORM	
This Complaint Form (the "Form") shall be completed if you wish to submit your complaint to Gate Securities (Cyprus) Limited (the "Company"). Complete the form with accurate information and submit this Form via email to compliance@gate-securities.eu for the proper investigation and evaluation of your complaint. Please note that the below Form is only indicative and not exhaustive. The Company may request further information and/or clarifications and/or evidence as regards your complaint.	
FOR OFFICIAL USE	
Date:	
Received by:	
Reference No:	
PERSONAL DETAILS	
Title: Mr. ☐ Mrs. ☐ Ms. ☐ Miss ☐ Sir ☐ Dr ☐	
Name:	
Middle Name:	
Surname:	
ID/Passport No:	
Nationality:	
Country of Residence	
City/Province:	
CONTACT DETAILS	
Postal Address:	
Postcode	
Email Address	
Mobile Phone No.:	
Home No.:	
ACCOUNT DETAILS	
Name of Legal Entity (if applicable):	
Trading account No:	
DETAILS OF THE COMPLAINT	
Date of incident:	
Concerned Employee	
Service & Product concerned: (If applicable)	
Disputed amount: (If applicable)	
Description of the Complaint:	

By submitting this form to Gate Securities (Cyprus) Ltd, I confirm that to the best of my knowledge, the information provided above is true, accurate and complete.