



Complaints Handling Policy and Procedure

Fidelis Wealth Management LLC

11 January 2022

Contents

1. Policy	4
2. Procedure	4
2.1 Definition of Complaint.....	4
2.2 Filing Complaints.....	4
2.3 Receiving Complaints	4
2.4 Handling Complaints	5
2.4.1 The Complaint form	5
2.4.2 Review	6
2.5 Solving Complaints.....	6
2.5.1 Time frame	6
3. Records and measures	6
APPENDIX I	8

Fidelis Wealth Management (the Company) has established this policy in order to set out the process to be adopted for Customer' Complaint handling.

Document Information

Document owner	Compliance
Author/Reviewer	FIDELIS WEALTH MANAGEMENT
Creation date	1ST OF SEPTEMBER 2018
Latest approval date	11ST OF JANUARY 2022

Whilst the Company endeavours to always provide excellent service to its Customers, it may happen that there be instances of Client dissatisfaction and the Company wants to ensure that its estimated Customers are fully happy with their interaction(s) with the Company and the service(s) provided.

To achieve this the Company will:

- Treat Customer fairly, and
- Investigate any complaint made by Customers fully and impartially, and
- Make regular contact with Customers to update Customers about the complaints addressed to the Company.

1. Policy

The Complaint procedures for the handling of Customer's complaints received by The Company are based on Order №13 / 04 of the President of the National Bank of Georgia, February 2, 2021 On the Approval of the Principles of Ethics and the Code of Professional Conduct for Banking and Securities Market Participants, with the aim to establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints or grievances received from current or potential Customer, and keep a record of each complaint or grievances and the measures taken for the complaint's resolution.

The Procedure Manual for handling client's complaints gathers all measures taken by the Company in order to solve potential inconveniences that might occur among the business relation.

2. Procedure

2.1 What is a complaint?

A complaint is an expression of dissatisfaction made to the Company by any one of its Clients with regards to the services provided.

2.2 Filing Complaints

The Clients willing to submit a complaint are advised to complete a Complaint Form, available on the web site of the Company, and to send it to the Company through the following means:

- By sending the Complaint Form by email at compliance@fidelis.ge
- By sending the Complaint Form via registered mail at: Fidelis Wealth Management LLC, Axis White Tower, 8th floor, Suite 5, Ilia. Chavcavadze Ave. 37M, Tbilisi 0162, Georgia
- By posting the Complaint Form through the Company Web Box on website www.fidelismgt.com

The Complaint Form can be sent electronically to the Customers concerned upon their request, or can be downloaded from the Company's website www.fidelismgt.com.

2.3 Receiving Complaints

After receiving the complaint, the Compliance Officer notifies by the end of the next working day the Customer that his inquiry was received and provides him / her with the name and the contact details of the person who is handling the complaint received.

Any complaint form received by the Company will be assigned a protocol number and registered in Complaints' Register maintained by the Compliance Department. The complaint will be examined and resolved by the Compliance Department in cooperation with the Department involved with the complaint. Depending on the nature and the possible claims arising thereof, a briefing or an opinion may be sought from the Legal Advisor of the Company

2.4 Handling Complaints

The Compliance Officer is responsible for handling customers complains or grievances. Its duties include the effective and efficient handling of customer's complains or grievances so as to enable the Company to adopt and apply the required actions to fully protect the customers' and the company's interests, acting independently and objectively and insuring that corrective measures are introduced to prevent the repetition of the same complains or grievances. In the cases where the complaint or grievance involves the Compliance Department it is to be handled by the Director.

In the Compliance Officer absence, the Director shall be responsible for the implementation of the Company's Complaints Handling Procedures.

2.4.1. The Complaint form

The Complaint form along with the current Complaint Handling Procedure is available on the Company website www.fidelismgt.com.

The Compliance Department records the complaint form information in the internal customer's complaint register, which includes the following data:

- details of the client that made the complaint
- the service/department to which the complaint refers to
- the details of the employee responsible for the service/s rendered to the client,
- the date of receipt and of registration of the complaint,
- the content of the complaint, in brief,
- the capital and the value of the financial instruments which belong to the client and are registered in his account,
- the magnitude of the damage which the client claims to have suffered or which can be presumed to have suffered on
- the basis of the contents of the complaint,
- the date and, briefly the content of the Company's written response to the complaint lodged
- a reference to any correspondence exchanged between the Company and the client.

2.4.2. Review

The Compliance Officer shall review carefully the details of each Client's complaint. Once the Compliance Officer understands fully the nature of the Client complaint, he/she shall investigate and question the relevant Departments related to each Client complaint and will:

Solve the Complaint by replying to the complainant and informing the Director regarding the decision

Or

Seek assistance by the Director

2.5 Solving Complaints

The Department involved in the Complaint shall take all necessary measures to:

- investigate and question the relevant personnel of the Departments related to each complaint(if necessary),
- communicate with other Departments/employees if this is require for solving the Complaint,
- call the specific Client for a personal interview or discuss the matter over the phone, asappropriate to identify the nature of the complaint

2.5.1 Time frame

According to the Company's policy, the complaints will be solved in maximum 10 working days.

In case, due to the nature of the complaint, more time is required for the complaint to be fully investigated and solved, the Department should inform the Compliance Officer. The Compliance Officer shall notify the complainant about the investigation running and to inform him /her about the approximate time period until the final response is sent, is laid down, which cannot be longer than 45 days starting from the working day following the reception of the initial complaint or the reception of additional evidence provided by the unit-holder concerned.

3. Records and measures

The Company shall maintain effective and transparent procedures for the prompt handling of complaints or grievances received from Clients. The Company shall keep a record of each complaint or grievance as well as the measures taken for the complaint's/grievance's resolution.

The Compliance Officer shall maintain all complaints, all relevant correspondence and documents

related to complaints, for a minimum period of five years.

One copy of the complaint form is archived in the client's file and another copy is kept in a separate file ("complain/ file").

In compliance with the law of President of the National Bank of Georgia Order №13 / 04 , February 2, 2021 On the Approval of the Principles of Ethics and the Code of Professional Conduct for Banking and Securities Market Participants, Article 13 (6), the Company shall report to the Regulator, any Complaints received on a monthly bases.

APPENDIX I

CUSTOMER COMPLAINT FORM

CLIENT DETAILS

First Name _____

Last Name _____

Address _____

ID/Passport No. _____

Telephone No. _____

E-Mail _____

Code Number _____

Signature _____

COMPLAINT INFORMATION

Description of the
product/service received _____

Reason of dissatisfaction _____

*****Please attach any supporting documentation***

FOR OFFICE USE ONLY

Received by

Designated Person

Signature

Date

Complaint No.

The information provided by filling out this form will be treated with confidentiality and will solely be used by Fidelis Wealth Management LLC . All data will be processed manually to ensure safety and confidentiality as in compliance with for all matters relating to the presentation and management of the complaint.