



# **Complaints Handling Policy**

Stratos Europe Limited



## 1. Introduction

Stratos Europe Limited (trading as "Tradu") is a Cyprus Investment Firm ("CIF") registered with the Cyprus Department of Registrar of Companies (HE 405643) and authorised and regulated by the Cyprus Securities and Exchange Commission ("CySEC") under license number 392/20. Registered address: DOMS Assets Business Centre, 33 Neas Engomis Street, 2409 Engomi, Nicosia, Cyprus.

The Company has adopted this Complaints Policy (the "Policy") in order to ensure a fair and quick process for handling client complaints (as these are defined below) that may arise from our relationship with clients.

The Firm's Compliance Function and the Global Compliance Monitoring Department have the obligation to monitor the operations of the complaints-handling process and consider complaints as a source of relevant information in the context of its general monitoring responsibilities.

## 2. Definition of a Complaint

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.

The Company considers important and essential to pay the proper attention to each and every complaint made by a client, irrelevant of the subject matter of the complaint.

## 3. Procedure

The Company shall establish a complaints management function responsible for the investigation of complaints. The Company's complaints management function shall be carried out by the Compliance Department.

In this respect, the Compliance Department shall deal with the clients' complaints unless it is necessary to involve the Senior Management in order to deal with the complaint.

The Client or potential client who wishes to proceed with filing a Complaint is requested to send either an email to [info@tradu.com](mailto:info@tradu.com) or submit the relevant form which can be found under the [Complaints section of our website www.tradu.com/eu](#), detailing the complaint and attaching any supporting evidence. A complaint must include: (i) the Client's name and surname, (ii) the Client's Trading Account number, (iii) the Client's address and email address and (iv) an accurate description of the issue.

- A written acknowledgment from the Compliance Department shall be sent to the client within five (5) days confirming receipt of the complaint and the estimated time under which the client shall be given a reply, and providing a unique reference number to the client for the specific complaint in accordance with Circular C338; the Compliance Department shall inform the client that he/she should use the said reference number in all future contact with the Company, the Financial Ombudsman and/or the CySEC regarding the specific complaint.
- The Compliance Department shall register the complaint directly to the Company's internal register, as soon as possible and in an appropriate manner, in accordance with the procedure described in Circular C338.
- Within two (2) months of receipt, the Company shall send the client a Final Response or a holding response, which will explain why the Company is not yet in a position to resolve the complaint and give an indication of the period of time within which it is possible to complete the investigation. This period of time shall not exceed three (3) months from the submission of the complaint.

- 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 further unless further correspondence is received from the client indicating that he/she is still dissatisfied.
- Please note that the Company shall consider a complaint as closed when a period of three (3) months has elapsed from the date of submission of the complaint and the client has failed to respond to the Company's investigating officer's requests and due to this the investigation cannot be carried forward.

Clients or potential clients can submit complaints to the Company free of charge. When handling a complaint, communication with clients or potential clients shall be clear, in plain language that is easy to understand.

It is understood that Clients' right to take legal action remains unaffected by the existence or use of any complaints procedures referred to above. In addition, Clients have the right to address their complaints to the Financial Ombudsman of Cyprus, provided that each complaint does not exceed the amount of one hundred and seventy thousand euro (€ 170,000), within four (4) months after the Company provides its final response.

If the client does not accept a decision taken by the Financial Ombudsman, he/she may take civil action by taking his/her case to court. Further information can be found on <https://www.financialombudsman.gov.cy/>.

Clients may also refer their complaint to CySEC, using the unique identification number provided by the Company at the time of the submission of the initial complaint. It is to be noted that CySEC does not have restitution powers and therefore does not investigate individual complaints.

## 4. Wallet Related Complaints

The Client or potential client who wishes to proceed with filing a Wallet related complaint is requested to send an email to [emdcomplaint@tradu.com](mailto:emdcomplaint@tradu.com).

All complaints will be relayed to Modulr Finance B.V. ("Modulr"). Complaints about the regulated services provided by Modulr will be treated in accordance with Modulr's complaints handling procedure. Complaints related to Tradu's wallet-related services shall be acknowledged within 5 working days via email and, depending on its complexity, a resolution shall be provided to you no later than 15 working days from the date of receipt of the acknowledgement email.

1. Modulr will acknowledge your complaint within 5 working days.
2. Modulr will investigate your complaint and get back to you within 15 working days of receipt of your complaint. If Modulr are unable to provide you with a final response within this time, they will send you an update.
3. If more than 35 working days from the date of the complaint has passed, and the client hasn't received a final response, or they are dissatisfied with the final response they have received, the client may be eligible to refer their complaint to the relevant authority, depending on your location:

The Netherlands and the rest of Europe (not including countries listed below)  
Financial Services Complaints Institute (KIFID)  
Address: Monarch Tower, Prinses Beatrixlaan, 2595 AK Den Haag  
Phone: +31 70 333 8 999  
Website: [www.kifid.nl](http://www.kifid.nl)

Ireland  
The Office of the Ombudsman  
Address: 6 Earlsfort Terrace Dublin 2, D02 W773, Ireland  
Phone: +353 1 6395600  
Website: [www.ombudsman.ie](http://www.ombudsman.ie)

France  
Le médiateur de la consommation auprès de l'AFEPAME  
Address: C/o WEBHELP GRAY, Zac de Gray, Impasse Clément Ader, 70100 Gray/Paris, France  
Email: [contact@mediateur-consommation-afepame.fr](mailto:contact@mediateur-consommation-afepame.fr)  
Website: <https://mediateur-consommation-afepame.fr>

Modulr's complaints handling procedure is available at: <https://www.modulrfinance.com/complaints-policy>

## 5. Records and Reporting

The Company shall keep and continuously update records of all the complaints received by clients with details of the investigation conducted, the final outcome of these, any measures taken for their resolution and all the communication with the clients.

Furthermore, the Company shall report on a monthly basis to CySEC information regarding Client complaints filed to the Company and how these are being handled, as per the requirements of Circular C338.

The Company's Compliance Function shall analyse complaints and complaints-handling data and records to ensure that any risks (e.g., legal and operational) or issues (e.g., recurring or systemic problems) are identified and addressed.

## 6. Review of the Policy

This policy shall be regularly reviewed and updated by the Compliance Function in line with applicable legislation updates and when considered necessary, and each updated version shall be approved by the Company's Board of Directors.

The Company will inform its Clients of any material changes to this procedure by posting the updated version of the policy on its Website.