



BLUE DIAGONAL CAPITAL LTD

(Regulated by the Cyprus Securities & Exchange Commission)

Client Complaints and Grievances Procedures

April 2017

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1. Principles

Blue Diagonal Capital (the “Company”) is committed to the maintenance of effective and transparent procedures for the fair and prompt handling of complaints or grievances received from potential or existing investors and clients. The Company maintains a Complaints and Grievances Register where all such complaints and grievances are recorded, and all actions pursuant to such a complaint or grievance are recorded.

The Company will examine all complaints and keep the complainant informed on the status of the complaint handling procedure.

2. Procedure

2.1 Filing of Complaints

Clients wishing to lodge a complaint are advised to complete a Complaint Form send it to the Company:

2.1.1 By email:

- investorrelations@blue-diagonal.com

2.1.2 By mail:

- The Head of Investor relations
Block A, Apt. 11, Zana Complex,
34 Amathountos Avenue,
Ayios Tychonas, Limassol 4532, Cyprus

2.2 Complaints Processing

The Company will process any complaint without undue delay. Upon receipt of the complaint the complaint will be entered into the Complaints and Grievances Register, and allocate a reference number to the complaint, which will be communicated to the party lodging the complaint.

The Company shall record the following information in the Complaints and Grievances Register in respect of each complaint:

- (a) the date on which the complaint was lodged
- (b) the identity of the complainant
- (c) the identity of the employee that processed the complaint
- (d) the identity of the employee that performed the Function or service to which the complaint relate
- (e) the Function to which the complaint relate
- (f) a full description of the complaint or grievance and the references in respect of any supporting documentation in respect of the complaint
- (g) in the event that a complainant claims to have suffered economic loss, the amount of financial loss claimed
- (h) a chronological summary of all responses by the Company to the complainant
- (i) CRO comments (where applicable)

2.3 Complaints Review

The Investors Relations Department is responsible for reviewing and resolving customer complaints. In the event that a complaint directly affects the Investor Relations Department, the complaint will be forwarded to Compliance who will make an entry into the Complaints and Grievances Register confirming that the complaint has been forwarded to Compliance,

and which will make an entry into the Complaints and Grievances Register including a recommendation as to the appropriate steps to be followed, including informing the party who lodged the complaint that the complaint has been brought to the attention of Compliance.

2.4 Complaints Resolution

Following the receipt of a complaint or grievance, by the Company, the Head of the Investors Relations department shall endeavour to resolve the complaint or handle the grievance within five (5) working days. In the event of a resolution of a complaint or a remedy of the grievance, such resolution or remedy should be entered into the Complaints and Grievances Register.

In the event that the issue has not been resolved within five (5) working days, including the cases where a remedy requires the participation of other departments, then the Head of Investor Relations Department shall escalate the complaint or grievance to the CEO (or his delegate).

The CEO (or his delegate) shall review carefully the details of the Subscriber's complaint or grievance brought to him, including communicating with the complainant, and shall make a determination on the appropriate response to the complaint, and will communicate his determination to the complainant, and to the extent that the determination requires any action from the Company, to those departments in the Company that should perform the specified resolution actions.

All correspondence with complainants in respect of complaints or grievances that has been entered into the Complaints and Grievances Register shall be in writing (including electronic mail) and copies shall be retained by the Investor relations department, and where such complaints directly affect the Investor relations departments, such correspondence will be forwarded to Compliance.

2.5 Data Retention

The Company shall retain all data related to complaints or grievances that has been entered into the Complaints and Grievances Register for a minimum period of **five** (5) years.

Appendix A: Complaints Form

FORM BDCCP_2017a

PLEASE COMPLETE THE FORM USING CAPITAL LETTERS

Section 1: Client Information (the "Client")

Client Name

Client Reference Number

Section 2: Escalation

In the event that the complaint or grievance is directed against the Client Investor Relations Department please and you wish the complaint to be escalated to the Compliance Reporting Officer please tick the box below:

I wish the complaint to be escalated to the Compliance Reporting Officer.

Section 3: Complaint Description

1. Service / department that is the subject of the complaint:
2. Contact Person (where applicable) in the Company with whom the complainant has been dealing:
3. Description of the complaint:
4. Description of any damages / financial losses claimed by the complainant:

5. Dates /Chronology of events relating to the complaint:
6. Details of any correspondence between the complainant and the Company in respect of the complaint (please attach copies of any correspondence):

I, the undersigned, hereby declare that the above statements are true to the best of my knowledge and belief.

Signature 1:	<input type="text"/>	Date:	<input type="text"/>
Signatory name:		<input type="text"/>	
Signatory capacity:		<input type="text"/>	