
Complaint Handling Policy

Skilling Limited

February 2026

1. Introduction

- 1.1. Skillling Limited (the “Company”, “we”, “us”, or “our”) is a private limited liability company incorporated under the Cyprus registration number HE373524 and regulated by the Cyprus Securities and Exchange Commission (hereinafter the “CySEC”), under licence number 357/18, with its registered office at 62 Athalassas Avenue, 2nd Floor, Office 22, 2012 Nicosia, Cyprus. For the purposes of these Terms references to “you”, “your”, or “client” refer to you, unless otherwise stated.
- 1.2. For client protection and satisfaction, you should take time to carefully read this Policy as well as any other policies, additional documents and information available to you through our website prior to opening a trading account with us. By entering into a business relationship with us, you confirm that you have read, understood and accepted all the general terms and conditions set out below, and any additional documents incorporated herein.
- 1.3. If you have objections to any of these general terms and conditions, or any part thereof, and/or if you do not agree to be bound by these general terms and conditions, or any part thereof, you should refrain from using our services and notify us in writing.
- 1.4. By accepting this Policy, you agree to be bound by these terms and conditions and our Terms of Business (including any schedules, annexes, exhibits, amendments and/or side agreements, if any) that apply to your account and are always subject to any applicable laws. In the event of any conflicts or inconsistency between our Terms of Business and this Policy, our Terms of Business shall prevail.

2. Definitions

- 2.1. “**Complainant**” means any person, natural or legal, who is eligible to lodge a complaint to the Company and / or who has already lodged a Complaint.
- 2.2. “**Complaint**” means a statement of dissatisfaction addressed to the Company by a Complainant relating to the provision of investment services. A non-exhaustive list of issues that may be considered as complaints can be found below:
 - 2.2.1. Execution of orders related issues;
 - 2.2.2. Investment advice;
 - 2.2.3. Unauthorised business;
 - 2.2.4. Withdrawals/deposits related issues.
- 2.3. “**Inquiry**” means a general question that does not constitute a Complaint.

3. Inquiries

- 3.1. If you have an inquiry, you may contact Customer Support via:
 - 3.1.1. Email: support@skillling.com
 - 3.1.2. Live Chat
- 3.2. Once we receive your inquiry, an acknowledgment of receipt will be sent to you usually during the same business day. We aim to resolve inquiries within five (5) business days
- 3.3. If your inquiry is not resolved, you may escalate it into a formal Complaint in line with Section 4 below.

4. Complaints submission

- 4.1. Complaints are usually submitted in writing using the Company's complaint form which can be provided from our Customer Support department upon your request. Once the complaint form is completed you can submit it in one of the following ways:
 - 4.1.1. By email to compliance@skilling.com
 - 4.1.2. By phone at +357 22 276710
 - 4.1.3. Via post to 2nd Floor, Office/Flat 22, 62 Athalassas Avenue, Strovolos 2012, Nicosia, Cyprus
- 4.2. Complaints received via telephone must be subsequently formalised in writing by the Complainant.
- 4.3. The complaint form shall be submitted and supporting document(s) shall also be provided to the Company at the time of submission so as to investigate the case in an utmost transparent manner.
- 4.4. The Company shall acknowledge receipt within five (5) business days and provide a unique reference number.

5. Complaints Handling

- 5.1. Once your Complaint is acknowledged, the Company shall use its best efforts to resolve the Complaint.
- 5.2. In the case that the Complaint is submitted in a language other than English, we might request clarifications regarding the translation.
- 5.3. At all times, the Complainant shall be informed by the Company in regard to the handling process of his/her Complaint.
- 5.4. We will use our best endeavours to provide you with the outcome of our investigation within two (2) months from the day of the submission of your Complaint.
- 5.5. If further investigation is required:
 - 5.5.1. The Complainant will be informed of the delay.
 - 5.5.2. The maximum period a reply shall not exceed three (3) months.
- 5.6. Upon completion, the Company shall provide a written response in clear and plain language.

6. Internal Complaint Handling

- 6.1. Upon receipt of a complaint, the Compliance Department shall register the complaint to an internal register, giving it a unique reference number.
- 6.2. Each complaint is:
 - 6.2.1. Registered within one (1) business day;
 - 6.2.2. Assigned a unique reference number; and
 - 6.2.3. Recorded in a secure internal register

- 6.3. Upon receiving a written complaint, the Company should obtain and record amongst others, the following details:
 - 6.3.1. Personal information of the client
 - 6.3.2. Client's account number
 - 6.3.3. The complaint's category and description
 - 6.3.4. The service provided by the Company and related to the complaint
 - 6.3.5. Disputable amount where applicable
 - 6.3.6. Date of receipt and registration of complaint
 - 6.3.7. Settlement date
 - 6.3.8. Evidence and/or supporting documents related to the complaint

7. Investigation and Resolution

- 7.1. The facts as stated by the client are examined and verified, to establish if any additional information is needed to be retrieved from the Company's archive (electronic mail, recorded telephone calls, IT data, etc.).
- 7.2. In the case where a complaint is valid, the management shall take such necessary action together with the Head of Department(s) to which the complaint is related, in order to identify and verify:
 - 7.2.1. Reasons for failure to follow procedure;
 - 7.2.2. Weaknesses of the internal controls; and
 - 7.2.3. Implementation of internal controls to prevent any complaints in the future.
- 7.3. Complaints may be resolved through one or more of the following measures:
 - 7.3.1. The provision of a clear and reasoned explanation;
 - 7.3.2. The issuance of a formal apology, where appropriate; and
 - 7.3.3. The award of financial compensation, where deemed necessary and justified.

8. Cases Where a Complaint May Not Be Accepted

- 8.1. The Company has the right to refrain from reviewing a Complaint where:
 - 8.1.1. It is classified as an inquiry (unless reclassified upon request). The Complainant maintains the right to request for the re-classification of his/her inquiry as a complaint.
 - 8.1.2. The Complainant cannot be identified.
 - 8.1.3. It includes offensive language directed either to the Company or an employee of the Company.
 - 8.1.4. It is received through telephones, unless the Complainant subsequently submits the complaint form as evident.

- 8.2. The Company is required by law to provide CySEC information regarding the received complaints and complaints-handling on a monthly basis.

9. Escalation

- 9.1. If you are not satisfied with the Company's final decision you may refer your complaint to the competent authorities by quoting your complaint's unique reference number, provided that no court decisions has been issued for the same complaint and/or no judicial procedure is pending for the examination of the same complaint as required under applicable laws and regulations.
- 9.2. The Financial Ombudsman website can be accessed via: <http://www.financialombudsman.gov.cy>
- 9.3. The Cyprus Exchange Securities (CySEC) website can be accessed via: <https://www.cysec.gov.cy>
- 9.4. The Complainant reserves the right to pursue legal action or alternative dispute resolution (ADR).

10. Ongoing Monitoring

- 10.1. The Company undertakes to analyse, on an ongoing basis, complaints-handling data, to ensure that they identify and address any recurring or systemic problems, and potential legal and operational risks. Such analysis shall include the causes of complaints in order to identify root causes common to those types of complaints and correction of such roots where deemed necessary.
- 10.2. Depending on the seriousness of the complaints, they may be classified as serious complaints or regular complaints. In all cases, complaints regardless of their impact, are dealt with the maximum attention and urgency.
- 10.3. Complaints may be resolved by means of an explanation or an apology, or even financial compensation.

11. Record Keeping

- 11.1. We maintain records of all complaints as well as all related details for a minimum period of five (5) years and where requested by CySEC, for a period of up to seven (7) years.
- 11.2. Records shall be stored in a medium so that they are readily accessible and available to clients on request, and such records shall be presented in the same language(s) as that used to provide investment services to clients.

12. Policy Review

- 12.1. The Company's policy is assessed and periodically reviewed, at least on an annual basis, or more frequently, should the need arise and any amendments to this policy shall be approved by the Company's Board of Directors.
- 12.2. The client shall be notified in writing of the nature of the changes deemed appropriate by law, and the revised policy will be available on the Company's Website.

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