

Innomp Group Limited

COMPLAINTS HANDLING PROCEDURE POLICY

Contents

CONTENTS	Error! Bookmark not defined.
1. Introduction	2
2. Scope and Purpose	2
3. Definitions	2
4. Complaint Handling Procedure	3
5. Record Keeping	4
6. Reporting to Authorities	4
APPENDIX A	5
Client Name: Account Number ID: Residential Address: Telephone Number:	6

1. Introduction

Innomp Group Limited (hereafter “the Company”) is incorporated in Saint Lucia under the Companies Act. The Company is not licensed or regulated by any financial services authority in Saint Lucia or elsewhere. Accordingly, all dealings between the Company and its clients are contractual in nature and governed exclusively by the terms of the Client Agreement and these Procedures.

2. Scope and Purpose

The Company maintains internal procedures for the reasonable and prompt handling of complaints received from clients. These procedures are designed to ensure that all client concerns are treated fairly and addressed in a timely manner. Records of complaints and remedial actions are retained for monitoring purposes.

This Policy sets out:

- how clients may submit complaints; and
- how such complaints will be reviewed and addressed by the Company.

3. Definitions

“Complaint” means a statement of dissatisfaction addressed to the Company by a client regarding services provided under the Client Agreement.

“Complainant” means any person, natural or legal, who has entered into a Client Agreement with the Company, opened a trading account, and submitted a complaint in accordance with this Policy.

A complaint must be submitted in writing using the Complaint Form (Appendix A) and sent to the Company by one of the following methods:

- (a) By email at complaints@innomp.com
- (b) By completing the complaint form on the Company’s website.

Submissions that do not meet the above definition (e.g. general inquiries) shall be categorized as inquiries and directed to the relevant department. Clients may request reclassification of an inquiry as a complaint if they believe it qualifies.

This Policy applies to all clients of Innomp Group Limited..

4. Complaint Handling Procedure

4.1 Verbal Complaints

The Company does not accept verbal complaints. Employees receiving verbal grievances must inform the client that complaints must be submitted in writing via the Complaint Form or by email to support@innomp.com or complaints@innomp.com.

If a client submits a Complaint Form to an account manager or staff member, it must be forwarded to the Compliance Department on the same working day.

Staff shall make reasonable efforts to resolve straightforward issues immediately, without committing the Company to any action or concession prior to a formal review.

4.2 Procedure to be followed for Written Complaints

When a written complaint is received, the following procedure applies:

- 4.2.1 **Forwarding** – Complaints received through internal channels (chat, phone, account manager, back office, etc.) must be forwarded in their original form to the Compliance Department the same working day.
- 4.2.2 **Acknowledgement** – The Compliance Department will acknowledge receipt via email within five (5) working days, providing a reference number for future correspondence.
- 4.2.3 **Review** – If the matter does not meet the definition of a complaint, it will be categorized as an inquiry and forwarded to the appropriate department.
- 4.2.4 **Registration** – Valid complaints are recorded in the internal Complaints Register and assigned a unique reference number, which is communicated to the complainant.
- 4.2.5 **Information to Complainant** – The complainant will be informed of:
 - the reference number;
 - the process and indicative handling time (15 working days);
 - the department or person responsible; and
 - confirmation that complaint handling is free of charge
- 4.2.6 **Information Gathering** – The following information may be requested and recorded:
 - client's name, contact details, and account number;
 - details of affected transactions (if any);
 - date and description of the issue;
 - correspondence and records relevant to the complaint;
 - claimed damages or losses.

- 4.2.7 **Investigation** – The Compliance Department will review all available information, including trading history, correspondence, system logs, and any staff input, to establish the facts.
- 4.2.8 **Decision** – The Company will notify the complainant in plain language of its decision, reasons, and any remedial action proposed.
- 4.2.9 **Timeframe** – The Company aims to resolve complaints within fifteen (15) working days. If additional time is needed, the complainant will be notified of the delay and provided with an expected timeline, which shall not exceed two months from submission.
- 4.2.10 **Record Keeping** – All complaints and resolutions will be recorded and retained electronically by the Compliance Department.
- 4.2.11 **Analysis** – The Compliance Department will periodically analyze complaints data to identify recurring issues and recommend corrective measures.

5. Record Keeping

The Company maintains electronic records of all complaints and related correspondence for a minimum of seven (7) years following closure of the client's trading account.

Records include, but are not limited to:

- complaint form and supporting evidence;
- account opening documentation;
- relevant trading records;
- correspondence with the client;
- internal assessments and decisions.

6. Reporting

As the Company is not licensed or regulated in Saint Lucia, it is not subject to statutory complaint reporting obligations. Complaints will therefore be reviewed and resolved internally in accordance with this Policy.

APPENDIX A

COMPLAINT FORM

Client Name: _____

Account Number ID: _____

Residential Address: _____

Telephone Number: _____

Date & Time the disputed situation arose:	
Services provided by the Company:	
Employee responsible for the provision of those services:	
Department where the employee belongs:	
Affected transactions:	
The ID's of the affected positions:	
Equity before:	
Equity after:	

Claimed magnitude of damage:	
-------------------------------------	--

Suggested way to be resolved:

Brief Description of the Complaint:

Date:

Signature:

Please enclose any relevant evidence and supporting documentation such as: screenshots, reports, error messages and error codes (if any)

Submit the form to the Company's Compliance Department

Complaint Registration Form (For Internal Use)

Complaint received by (email/ website): _____

Employee handling the complaint: _____

Date of Receipt: _____

Date initial response: _____

Action taken by the Company:

Result (legit/ not legit complaint) and Date of final response: _____

Head of Back Office Department signature: _____

Head of Compliance Department signature: _____

Senior Management signature (if required): _____

Please enclose any relevant evidence and supporting documentation such as: file notes, contact attempts/ communication with the client (with dates, method of communication and outcome), emails exchanged with the client.