

# Complaints Manual

INGOT Financial Services L.L.C.

Version 1.0

## First: Commitment to Our Clients

At INGOT Financial Services L.L.C. (hereinafter, the "Company"), we are committed to delivering high-quality services to our clients and ensuring client satisfaction as one of our main priorities. This is why we do our best to take effective and timely measures to manage complaints, ensuring transparency and integrity in handling such matters.

We believe in listening to clients' experiences and feedback to enhance our services on a regular basis. Therefore, we urge clients to contact us about any issue they may encounter or complaint they would like to raise. We assure clients that their complaint will be handled in a timely and effective manner.

Each complaint is given a reference number to be used in all correspondences done between the Company and the complainant and is followed-up with in an effective manner from receipt date to the conclusion of the complaint handling procedure by informing the complainant of the decision taken regarding their complaint within the period of complaint processing.

## Second: Application and Definition

- This policy applies to all the complaints we receive and outlines the procedures we take to handle such complaints.
- A complaint is defined as a written statement of objection submitted by the complainant or their legal proxy.
- This policy aims to encourage feedback and complaints submission, efficient complaints handling, and effective service enhancement based on clients' feedback.
- The Company undertakes not to impose any conditions that hinder the client's right to submit a complaint, affect their relationship with the company, or require withdrawal of the complaint.
- The Company undertakes not to demand any fees for submitting complaints.
- The Company undertakes to handle all complaints without discrimination or preferential treatment among clients and in a clear, effective, and fair manner for all clients.
- This policy is approved by the Board of Directors and is reviewed annually or whenever necessary upon the Board's approval to ensure the effectiveness and sufficiency of the Company's procedures in handling clients' complaints.
- The latest version of this policy has been updated and approved on

### Third: Our Complaints Handling Guidelines

Our Complaints Handling Policy guidelines aim to:

- Manage complaints effectively while maintaining efficiency and integrity.
- Learn from our clients' feedback by keeping a record of the complaints submitted to the Company, in addition to setting criteria for enhancing the Company's performance through analyzing feedback and complaints and implementing necessary procedures for handling them
- Such commitment must be undertaken by all staff members at the Company.
- Seeking the right solutions for clients' complaints and limiting their repetition, as well as constantly attempting to minimize the number of complaints and the time needed for handling them.

We will thoroughly investigate your complaint. This may involve reviewing your relationship history, speaking to relevant personnel, and examining any supporting documents you have provided. We aim to complete our investigation within 15 business days. If the investigation takes longer, we will keep you informed of the progress and provide an estimated resolution time.

### Fourth: Reporting Process

When submitting a complaint, please provide the following information to help us address your issue promptly:

- Your full name
- Contact details (email and phone number)
- A detailed description of your complaint
- Any relevant supporting documents or evidence

INGOT Financial Services L.L.C. contact information: [info@ingot.ae](mailto:info@ingot.ae)

All complaints are handled with strict confidentiality. We will only disclose information to those involved in the investigation and resolution of your complaint

### Fifth: Official Complaints Handling Procedure

Our team aims to respond to all the complaints we receive in a timely manner, and to determine the primary procedure suitable for each complaint depending on its nature and severity.

We manage complaints in a fair, objective manner. Clients can reach out again through any of our channels to ensure they are satisfied with the solution provided.

We will send the complainant a reference number and will also notify them with our final response, if applicable. Otherwise, we will clarify the reason for the delay and request more information, if applicable.

The following is the journey of the complaint in the Company:

1. Acknowledgement

Clients who log their complaint through email to [info@ingot.ae](mailto:info@ingot.ae) will receive an automated acknowledgment.

2. Internal Investigation

Once a complaint is registered, this will be investigated accordingly. The Client may be asked for additional information, as needed. A thorough complaints investigation report shall be completed and saved accordingly in the Company's document repository.

3. Response

The Company will respond to and resolve the client's complaint within 15 business days of receipt. The response will include the contact details and the name of the Compliance Officer who has the ultimate decision-making authority for the complaint, as well as the procedures for handling complaints.

In the case that the 15 business days are due to elapse from the receipt of the complaint and the internal investigation has not yet been completed, the Company shall inform the complainant of such fact in writing preferably on the fourteenth (14) day, and no later than the 15th business day.

The Company shall clearly disclose that:

- The investigation of the complaint is ongoing;
- Explain the cause of the delay, and
- Provide an indication as to when the investigation is likely to be completed.

4. Resolution

The Company shall communicate to the client accordingly and advise them that they can also refer their complaint to the Securities and Commodities Authority ("SCA") if they are unsatisfied with the Company's resolution.

Details on how to escalate their case will be communicated to them via email along with the Company's response once the client is satisfied with the Company's response and the complaint case is closed this shall be recorded within the complaints register and the investigation report updated accordingly.

The complaint handling procedures are freely accessible to all clients on the [ ] website. This document outlines the necessary steps to file a complaint and the available options for resolving disputes.

## Referring the Complaint to SCA

When providing a final decision on the complainant which does not fully satisfy the complainant's demands, the Company shall thoroughly explain its resolution on the matter and shall also disclose that if the complainant is not satisfied with the way the complaint was resolved they may also escalate the matter to the SCA.

To raise a complaint with SCA, the complainant can approach SCA directly on their website:

Website: [www.sca.gov.ae](http://www.sca.gov.ae)

Phone: 800722823

## Record-Keeping

### 1. Preservation of Documents and Correspondence

All documentation related to the complaint, including the initial complaint, the investigation report and any correspondence shall be saved in the respective folder in the company's document repository.

### 2. Complaints Register

The Company maintains a complaints register. The complaints register is divided into two sections: 'complaints' and 'queries'. The complaints register contains the following details:

- Internal Complaint No.;
- Regulatory Complaint (Yes or No);
- Client Code/Login ID;
- Date of receiving and answering the Complaint;
- The nature of the Complaint and the cause;
- Summary of complaint;
- Type of Internal Decision Made Vis-à-vis Complaint / Response to Client;
- Result and outcome of the complaint – whether it was resolved internally, or the client referred the complaint to SCA;
- Corrective action taken internally to prevent a similar issue from arising again; and
- Case handled by.

## Governance and Responsibilities

### 1. Compliance Officer

The complaints management function is responsible for investigating complaints fairly and to identify or mitigate possible conflicts of interest and is managed by the Compliance Officer of the Company.

The Compliance officer maintains oversight of any regulatory complaints received and reports on complaint matters to the board of directors. A summary of regulatory complaints received is reported on a periodic basis and at least annually.

In case of unresolved disputes logged through the regulator, reporting to the BOD is to happen without delay. The purpose of the reporting process is to promote awareness and/or to decide if any additional action is required.

### 2. Customer Support

The Company has a dedicated Customer Support team, where each client support officer is only responsible for client support and does not participate in managing or providing the relevant financial services.

Key responsibilities of the Client Support Officers are to:

- Monitor complaints by assigning correct tags on CRM ("complaints-regulated");
- Report such complaints to the Compliance team;
- Assist with case investigation to the Compliance team, if required; and
- Send the Final Reply drawn up or approved by Compliance to the complainant.

### 3. Compliance team

#### 1. Complaints from Clients or Prospective Clients

The Company has a dedicated Compliance team under the supervision of the Compliance Officer, who collectively, are responsible for handling and replying to complaints. The Compliance team does not participate in managing or providing the relevant financial services to clients. The Compliance team will have access to clients' details and information about complaints, granting them sufficient authority to investigate and resolve issues. If any difficulties arise, the Compliance team shall consult the Company's Compliance Officer for assistance and work towards an appropriate resolution. This ensures the Compliance team can handle all complaints appropriately, justly, and impartially, and any conflicts of interest are avoided.

The key responsibilities of the Company's Compliance team are to:

- Monitor complaints;
- Ensure investigations are managed fairly and possible conflicts of interest are identified and mitigated;
- Log each complaint in the complaints register.
- Prepare a Complaint Investigation Report (CIR);
- Review replies in the CIR before they are sent to the complainants, where applicable;
- Monitor that the final replies reach the complainants by not later than 15 days from receipt of complaint;
- Update and review the complaints register to ensure that there was not an increase in the number of complaints, and, if this is the case, further analysis and investigations are conducted with key staff to resolve any potential operational issues in order to ensure that the Company offers an excellent level of service; and
- Handle the complaint with the relevant regulator in case the complaint has been escalated to the regulator by the complainant.

## 2. Internal follow-up of complaints

The complaints register is being regularly updated and reviewed to ensure that any recurring or systematic problems have been identified, and mitigation measures are undertaken.

### Complaints Extension

In cases where the fifteen (15) days are due to elapse from the receipt of the complaint and the internal investigation has not yet been completed, the Company is obliged to inform the complainant of such fact in writing preferably on the fourteenth (14) day. The Company must clearly disclose that:

- It continues with the investigation of the complaint;
- Explain the cause of the delay, and
- Provide an indication as to when the investigation is likely to be completed.

The following acknowledgement shall be sent to the client:

"Dear Madam / Sir,

We regret to inform you that we were unable to complete our internal investigation within 15 days due to x (provide the cause of the delay).

We will continue our investigation, and we shall provide our final response within the next x (provide an indication as to when the investigation is likely to be completed) days.

Thank you for your understanding and cooperation.

Yours sincerely"