

COMPLAINT HANDLING POLICY

(FINANCIAL CONSUMER PROTECTION (COMPLAINT HANDLING) REGULATIONS, 2024 – COMPLIANT)



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1. INTRODUCTION

Oval Ltd (“the Company”) is a company incorporated in the Republic of Seychelles, with its registered office at Suite 3, Global Village, Jivan’s Complex, Mont Fleuri, Mahe, Seychelles, and licensed by the Financial Services Authority of Seychelles (“FSA”).

Oval Ltd is committed to treating all clients fairly and maintaining high standards of transparency, integrity, and professionalism. This Complaint Handling Policy establishes a clear, effective, and fair framework for receiving, investigating, resolving, and recording complaints in accordance with applicable laws and regulations, including the Financial Consumer Protection (Complaint Handling) Regulations, 2024.

2. OBJECTIVES OF THE POLICY

The objectives of this Complaint Handling Policy are to:

- 2.1. establish a **clear, effective, and transparent framework** for the receipt, investigation, resolution, and recording of complaints;
- 2.2. ensure that complaints are handled **fairly, consistently, independently, and within the prescribed regulatory timeframes**;
- 2.3. safeguard the rights and interests of consumers and eligible complainants in accordance with the **Financial Consumer Protection (Complaint Handling) Regulations, 2024**;
- 2.4. ensure that complainants are provided with **clear information regarding outcomes, reasons for decisions, and available escalation options**, including referral to the Financial Services Authority of Seychelles (“FSA”);
- 2.5. promote a culture of **accountability, integrity, and continuous improvement** within Oval Ltd;
- 2.6. identify systemic issues, root causes, and operational weaknesses through complaint analysis, and implement appropriate remedial and preventive measures;
- 2.7. ensure full compliance with all applicable consumer protection, financial services, and regulatory obligations in Seychelles.

3. SCOPE OF THE POLICY

This Complaint Handling Policy applies to all complaints received by Oval Ltd in relation to the provision of its financial services and the conduct of its business, in accordance with applicable consumer protection and financial services regulations in the Republic of Seychelles.

Specifically, this Policy covers:

- all complaints submitted by **consumers and eligible complainants**, whether existing or potential clients;
- complaints relating to **products, services, operational processes, trading conditions, client onboarding, account management, communications, conduct, or omissions** of Oval Ltd or its representatives;
- complaints received through **any communication channel**, including but not limited to written correspondence, electronic communications, telephone calls, verbal communications, or support ticket systems;
- complaints submitted **directly by complainants or through duly authorised representatives**.

This Policy applies to complaints received at any stage of the client relationship, including pre-contractual, contractual, and post-contractual stages.

Exclusions

This Policy does **not** apply to:

- internal employee grievances, disciplinary matters, or employment-related disputes, which are governed by separate internal human resources policies and procedures;
- matters that do not constitute a complaint as defined under this Policy, unless they subsequently develop into an expression of dissatisfaction.

Where a matter falls outside the scope of this Policy, Oval Ltd shall, where appropriate, inform the individual of the relevant process or department responsible for handling such matters.

4. DEFINITION OF A COMPLAINT

For the purposes of this Policy, a complaint shall mean:

Any oral or written expression of dissatisfaction, whether justified or not, made by or on behalf of a consumer or eligible complainant, relating to:

- the provision of, or failure to provide, any financial service by Oval Ltd;
- the terms, conditions, pricing, execution, administration, or performance of any product or service offered by Oval Ltd; or
- the conduct, actions, omissions, or behaviour of Oval Ltd, its employees, officers, agents, or representatives.

A complaint may be submitted through any communication channel, including but not limited to written correspondence, electronic communications, telephone calls, verbal communications, or support ticket systems.

Exclusions

The following shall not be considered complaints under this Policy, unless they subsequently develop into an expression of dissatisfaction:

- requests for general information or clarification;
- routine service requests or administrative enquiries;
- matters unrelated to the provision of financial services by Oval Ltd.

Where uncertainty exists as to whether a communication constitutes a complaint, Oval Ltd shall treat the matter as a complaint and handle it in accordance with this Policy.

5. ELIGIBLE COMPLAINANTS

For the purposes of this Complaint Handling Policy and in accordance with the **Financial Consumer Protection (Complaint Handling) Regulations, 2024**, an **eligible complainant** shall include the following categories:

5.1. Consumers

A **consumer**, being a natural person who is acting for purposes outside his or her trade, business, or profession.

Where applicable, an elective professional client who is a natural person shall be treated as a consumer for the purposes of complaint handling and consumer protection.

5.2. Micro-Enterprises

A **micro-enterprise**, being an enterprise which:

- employs fewer than ten (10) persons; and
- has an annual turnover or annual balance sheet total that does not exceed the thresholds prescribed under applicable consumer protection regulations.

5.3. Charities and Trusts

The following entities shall also qualify as eligible complainants, subject to applicable financial thresholds:

- a **charity** whose annual income does not exceed the threshold prescribed by applicable regulations at the time the complaint is made;
- a **trustee of a trust** whose net asset value does not exceed the prescribed regulatory threshold at the time the complaint is made.

5.4. Authorised Representatives

A complaint may be submitted on behalf of an eligible complainant by a **duly authorised representative**, provided that satisfactory evidence of such authorisation is supplied upon request.

5.5. Non-Eligible Complainants

Professional clients that are not natural persons, institutional investors, and other entities that do not fall within the categories listed above shall be considered **non-eligible complainants** for the purposes of consumer protection regulations.

While Oval Ltd may, at its discretion, consider and address complaints from non-eligible complainants, such complaints shall not benefit from the full scope of protections afforded under the **Financial Consumer Protection (Complaint Handling) Regulations, 2024**.

6. ACCESSIBILITY AND TRANSPARENCY

Oval Ltd is committed to ensuring that its complaint handling process is accessible, transparent, and consumer-focused, in accordance with the Financial Consumer Protection (Complaint Handling) Regulations, 2024.

To achieve this, Oval Ltd shall ensure that:

- information on how to submit a complaint is clearly communicated, easily accessible, and free of unnecessary barriers for consumers and eligible complainants;
- this Complaint Handling Policy is publicly available on the Company's official website and may be provided to complainants upon request, in a durable and easily readable format;
- complainants are informed, at the time of submitting a complaint or promptly thereafter, of:
 - the complaint handling process;
 - applicable timelines for acknowledgement and resolution; and
 - their right to escalate the complaint to the Financial Services Authority of Seychelles ("FSA") where applicable;
- complaints may be submitted through multiple communication channels, including written, electronic, and verbal means, without discrimination or unreasonable restriction;

- communications with complainants are conducted in clear, fair, and non-misleading language, avoiding unnecessary technical or legal complexity;
- complainants are not subject to any fees, penalties, or disadvantages for submitting a complaint.

Oval Ltd shall take reasonable steps to ensure that complainants with different needs, including language or accessibility considerations, are able to access the complaint handling process in a fair and effective manner.

7. SUBMISSION OF COMPLAINTS

Oval Ltd shall ensure that complaints may be submitted in a **simple, accessible, and effective manner**, without undue burden on the complainant.

7.1. Accepted Channels

A complaint may be submitted to Oval Ltd through any of the following channels:

- the Company's official **support ticket system**;
- **email** to the designated contact address;
- **telephone or other verbal communication**, including calls to Client Support; or
- **written correspondence**, whether in physical or electronic form.

Complaints may be submitted by existing or potential clients, or by a duly authorised representative acting on behalf of the complainant.

7.2. Form and Content of Complaints

A complaint does not need to follow a prescribed format in order to be valid.

However, to facilitate efficient investigation, complainants may be requested to provide, where available:

- identification details of the complainant;

- a clear description of the matter giving rise to the complaint;
- relevant dates, account references, or transaction details; and
- supporting documents or information, where applicable.

The absence of any of the above information shall **not** prevent a complaint from being registered or investigated.

7.3. Verbal Complaints

Where a complaint is submitted verbally:

- Oval Ltd shall record the complaint accurately and promptly;
- the complainant shall be informed that the matter has been registered as a complaint; and
- a written record or summary of the complaint may be created for internal handling purposes.

Verbal complaints shall be treated **with the same seriousness and priority** as written complaints.

7.4. Complaints Submitted by Authorised Representatives

Where a complaint is submitted by a third party on behalf of a complainant, Oval Ltd reserves the right to request **reasonable evidence of authorisation** before proceeding, in order to protect the interests and confidentiality of the complainant.

7.5. No Restriction or Disadvantage

Oval Ltd shall not:

- impose any fees or charges for submitting a complaint;
- require the complainant to exhaust informal channels before submitting a complaint; or

- subject the complainant to any form of disadvantage, retaliation, or discrimination as a result of submitting a complaint.

8. ACKNOWLEDGEMENT OF COMPLAINTS

Upon receipt of a complaint, Oval Ltd shall ensure that the complaint is **formally acknowledged in a timely, clear, and transparent manner**, in accordance with applicable regulatory requirements.

8.1. Acknowledgement Timeline

Oval Ltd shall acknowledge receipt of a complaint **within two (2) business days** from the date the complaint is received, regardless of the channel through which the complaint was submitted.

Where a complaint is received outside normal business hours, it shall be deemed to have been received on the next business day.

8.2. Form of Acknowledgement

The acknowledgement shall be provided **in writing**, unless otherwise agreed with the complainant, and shall include, at a minimum:

- confirmation that the complaint has been received and registered;
- a brief summary or reference to the subject matter of the complaint;
- the date of receipt of the complaint;
- information on the **complaint handling process**, including applicable investigation and resolution timelines;
- contact details of the department or function responsible for handling the complaint.

8.3. Incomplete Complaints

Where a complaint lacks sufficient information to enable effective investigation, Oval Ltd may request additional information from the complainant.

Such a request shall **not** delay the acknowledgement of the complaint and shall be made without undue burden to the complainant.

8.4. Verbal Complaints

Where a complaint is submitted verbally:

- Oval Ltd shall record the complaint accurately and without delay;
- the complainant shall be informed that the matter has been registered as a complaint; and
- the acknowledgement requirements under this section shall apply in the same manner as for written complaints.

9. INVESTIGATION AND RESOLUTION

Oval Ltd shall investigate and resolve all complaints **fairly, objectively, independently, and within the prescribed regulatory timeframes**, in accordance with the **Financial Consumer Protection (Complaint Handling) Regulations, 2024**.

9.1. Investigation Standards

All complaints shall be investigated in a manner that is:

- **impartial and unbiased**, taking into account all relevant facts and evidence;
- **proportionate**, having regard to the nature, complexity, and potential impact of the complaint;
- **independent**, free from conflicts of interest or undue influence; and
- **properly documented**, enabling the complaint handling process to be reviewed and audited.

Any employee, officer, or representative who was directly involved in the matter giving rise to the complaint shall **not** participate in the investigation, assessment, or decision-making process relating to that complaint.

9.2. Responsibility for Investigation

- Complaints shall be handled under the oversight of the **Compliance Officer** or another suitably independent and senior function designated by Oval Ltd.
- Where necessary, relevant information may be obtained from other departments; however, ultimate responsibility for ensuring fairness, objectivity, and regulatory compliance shall remain with the Compliance function.

9.3. Resolution Timeframes

Oval Ltd shall provide a **final response** to the complainant:

- **within fifteen (15) business days** from the date of receipt of the complaint.

Extension of Time

Where, due to the complexity of the complaint or the need to obtain additional information, a final response cannot be provided within fifteen (15) business days, Oval Ltd shall:

- inform the complainant of the reasons for the delay; and
- provide an indicative timeframe for resolution,

provided that the total period for resolution shall **not exceed thirty (30) business days** from the date of receipt of the complaint.

9.4. Outcome of Investigation

The investigation may result in one or more of the following outcomes, as appropriate:

- acceptance of the complaint, in whole or in part;
- rejection of the complaint, with clear and reasoned justification;
- remedial action, corrective measures, or redress, where applicable;

- identification of systemic or operational issues requiring internal improvements.

9.5. Fair Treatment of Complainants

Throughout the investigation and resolution process, Oval Ltd shall ensure that:

- complainants are treated **fairly, respectfully, and without discrimination**;
- no complainant is subjected to retaliation, disadvantage, or undue delay as a result of submitting a complaint; and
- communications are conducted in a **clear, timely, and professional manner**

10. FINAL RESPONSE

Oval Ltd shall provide a **final response** to the complainant following the completion of the investigation, in accordance with the **Financial Consumer Protection (Complaint Handling) Regulations, 2024**.

10.1. Form and Timing of Final Response

- The final response shall be provided **in writing**, using a durable medium (including electronic communication), unless otherwise agreed with the complainant.
- The final response shall be issued:
 - **within fifteen (15) business days** from the date of receipt of the complaint; or
 - where an extension applies, **no later than thirty (30) business days** from the date of receipt, in accordance with Section 9 of this Policy.

10.2. Content of Final Response

The final response shall be **clear, reasoned, and comprehensive**, and shall include, at a minimum:

- a summary of the complaint and the issues considered;
- the outcome of the investigation;
- a clear explanation of the reasons for the decision reached;
- details of any remedial action, corrective measures, or redress offered, where applicable;
- confirmation of whether the complaint has been upheld, partially upheld, or rejected;
- information on the complainant's **right to escalate the complaint** to the Financial Services Authority of Seychelles ("FSA") if dissatisfied with the outcome.

Where the decision refers to applicable laws or regulations, the relevant legal or regulatory provisions shall be referenced in a clear and understandable manner.

10.3. Delayed Final Response

Where Oval Ltd is unable to issue a final response within fifteen (15) business days, the Company shall notify the complainant in writing before the expiry of that period, explaining:

- the reasons for the delay; and
- the expected timeframe within which the final response will be provided,

provided that the total time for resolution shall not exceed **thirty (30) business days** from the date of receipt of the complaint.

10.4. Right to Escalate

The final response shall clearly state that:

- if the complainant is dissatisfied with the outcome; or
- if no final response is received within the prescribed timeframe,

the complainant may refer the complaint to the **Financial Services Authority of Seychelles (FSA)** without prejudice to any other rights or remedies available under applicable law.

10.5. Closure of Complaint

Once the final response has been issued and any agreed remedial action completed, the complaint shall be considered **closed** for internal purposes, subject to any further escalation by the complainant to the FSA.

11. ESCALATION TO THE FINANCIAL SERVICES AUTHORITY (FSA)

Where a complaint has been handled in accordance with this Policy, Oval Ltd recognises the right of the complainant to seek independent regulatory review.

11.1. Right to Escalate

A complainant may refer a complaint to the **Financial Services Authority of Seychelles (“FSA”)** where:

- the complainant is **dissatisfied with the final response** issued by Oval Ltd; or
- Oval Ltd has **failed to issue a final response within the prescribed timeframe** set out in this Policy.

The referral of a complaint to the FSA shall be **without prejudice** to any other rights or remedies available to the complainant under applicable laws and regulations.

11.2. Information Provided to the Complainant

Oval Ltd shall ensure that complainants are clearly informed, in the final response or earlier where appropriate, of:

- their right to escalate the complaint to the FSA;
- the circumstances under which such escalation may take place; and
- the role of the FSA in reviewing complaints.

11.3. Cooperation with the FSA

Upon receipt of notification that a complaint has been escalated to the FSA, Oval Ltd shall:

- cooperate fully, promptly, and transparently with the FSA;
- provide all relevant records, documents, and information requested by the FSA within the prescribed timeframe;
- designate an appropriate senior officer, including the Compliance Officer, as the primary point of contact for the FSA.

11.4. Effect of FSA Review

Oval Ltd acknowledges that the FSA may review the complaint and may issue directions or take regulatory action in accordance with its statutory powers.

Where applicable, Oval Ltd shall implement any corrective, remedial, or compliance measures arising from the FSA's review in a timely and effective manner.

11.5. No Restriction on Escalation

Nothing in this Policy shall be construed as limiting, restricting, or discouraging a complainant from exercising their right to refer a complaint to the FSA in accordance with applicable consumer protection regulations.

12. COMPLAINT REGISTER AND RECORD KEEPING

Oval Ltd shall establish, maintain, and operate a **centralised Complaint Register** to ensure that all complaints are properly recorded, monitored, and retained in accordance with the **Financial Consumer Protection (Complaint Handling) Regulations, 2024** and other applicable laws and regulations in Seychelles.

12.1. Complaint Register

The Complaint Register shall be maintained in a **durable and retrievable format**, whether electronic or physical, and shall record, at a minimum, the following information in respect of each complaint:

- a unique complaint reference number;
- the date on which the complaint was received;
- the identity and contact details of the complainant (where applicable);
- the classification or nature of the complaint;
- the communication channel through which the complaint was submitted;
- a summary of the issues raised;
- details of the investigation conducted;
- actions taken and decisions made;
- the date of acknowledgement;
- the date of final response; and
- the outcome of the complaint, including whether it was upheld, partially upheld, or rejected.

The Complaint Register shall enable Oval Ltd to track each complaint **from receipt to closure** and to demonstrate compliance with prescribed timelines.

12.2. Accuracy and Integrity of Records

Oval Ltd shall ensure that:

- complaint records are **accurate, complete, and updated promptly** throughout the complaint handling process;
- records are maintained in a manner that prevents unauthorised alteration, deletion, or loss;
- access to complaint records is restricted to authorised personnel only, in accordance with internal governance and confidentiality requirements.

12.3. Retention Period

All complaint records, including correspondence, investigation notes, supporting documentation, and final responses, shall be retained for a minimum period of **seven (7) years** from the date on which the complaint is closed, or for such a longer period as may be required under applicable laws or regulatory directions.

12.4. Data Protection and Minimisation

In maintaining complaint records, Oval Ltd shall:

- collect and process personal data **solely for the purpose of handling and resolving complaints**;
- ensure that personal data collected is **adequate, relevant, and limited** to what is necessary;
- handle all personal data in accordance with applicable data protection and privacy requirements.

Where legally permissible, personal data shall be securely deleted, anonymised, or rendered non-identifiable after the expiry of the applicable retention period.

12.5. Regulatory Access and Reporting

Oval Ltd shall make complaint records available to the **Financial Services Authority of Seychelles (FSA)** upon request and within the timeframe specified by the regulator.

The Complaint Register may also be used for the preparation of internal management reports and regulatory submissions, including trend analysis and thematic reviews, where required.

13. CONFIDENTIALITY AND DATA PROTECTION

Oval Ltd is committed to maintaining the **confidentiality, integrity, and security** of all information obtained in connection with the handling of complaints, in accordance with applicable data protection laws and the Company's **Privacy and Data Protection Policy**.

13.1. Confidentiality of Complaints

All complaints and information relating to complaints shall be treated as **confidential** and shall only be disclosed to:

- employees, officers, or functions of Oval Ltd who have a legitimate need to know for the purpose of investigating and resolving the complaint; or
- regulatory authorities, including the **Financial Services Authority of Seychelles (FSA)**, where disclosure is required or permitted by law.

No information relating to a complaint shall be disclosed to third parties without the complainant's consent, unless such disclosure is required by law or regulatory obligation.

13.2. Processing of Personal Data

Personal data collected in connection with the submission, investigation, and resolution of complaints shall be:

- processed **lawfully, fairly, and transparently**;
- collected **solely for legitimate complaint handling purposes**;
- limited to what is **adequate, relevant, and necessary** for those purposes; and
- handled in accordance with Oval Ltd's **Privacy and Data Protection Policy**, as amended from time to time.

13.3. Data Accuracy and Security

Oval Ltd shall take reasonable and appropriate technical and organisational measures to ensure that:

- personal data relating to complaints is **accurate and kept up to date**;
- complaint records are protected against **unauthorised access, loss, alteration, or disclosure**; and

- access to complaint-related personal data is restricted to authorised personnel only.

13.4. Retention and Deletion of Data

Personal data relating to complaints shall be retained only for as long as necessary to:

- fulfil the purposes of complaint handling;
- comply with applicable legal, regulatory, and record-keeping obligations; and
- protect the legitimate interests of Oval Ltd in relation to dispute resolution and regulatory compliance.

Upon expiry of the applicable retention period, personal data shall be **securely deleted, anonymised, or rendered non-identifiable**, in accordance with Oval Ltd's Privacy and Data Protection Policy and applicable laws.

13.5. Data Subject Rights

Complainants retain all applicable **data subject rights** in relation to their personal data, including rights of access, rectification, and erasure, subject to any legal or regulatory limitations.

Requests relating to personal data rights shall be handled in accordance with Oval Ltd's Privacy and Data Protection Policy and applicable data protection laws.

13.6. Consistency with Privacy and Data Protection Policy

This section shall be read together with, and shall not replace or override, Oval Ltd's **Privacy and Data Protection Policy**.

In the event of any inconsistency, the Privacy and Data Protection Policy shall prevail in relation to the processing of personal data.

14. MONITORING, ANALYSIS AND REPORTING

Oval Ltd shall establish and maintain effective arrangements for the **ongoing monitoring, analysis, and reporting of complaints**, with the objective of identifying risks, systemic issues, and opportunities for improvement, in accordance with the **Financial Consumer Protection (Complaint Handling) Regulations, 2024**.

14.1. Ongoing Monitoring of Complaints

Oval Ltd shall monitor complaints on a **continuous basis** to ensure that:

- complaints are handled in accordance with this Policy and within the prescribed regulatory timeframes;
- complaint handling outcomes are consistent, fair, and appropriately reasoned;
- any delays, deviations, or failures in the complaint handling process are identified and addressed promptly.

Monitoring shall include periodic reviews of the Complaint Register and relevant complaint records maintained under Section 12 of this Policy.

14.2. Analysis of Complaint Trends and Root Causes

Oval Ltd shall conduct periodic analysis of complaints in order to:

- identify recurring or systemic issues affecting consumers;
- assess root causes relating to products, services, systems, processes, or staff conduct;
- evaluate the effectiveness of existing controls, procedures, and client communications; and
- detect emerging risks that may adversely impact consumers or regulatory compliance.

Where appropriate, complaints analysis shall distinguish between different categories of complaints, including but not limited to operational issues, trading-related matters, service quality, and conduct-related concerns.

14.3. Corrective and Preventive Measures

Where monitoring or analysis identifies deficiencies, weaknesses, or systemic issues, Oval Ltd shall take **appropriate corrective and preventive actions**, which may include:

- changes to internal policies, procedures, or controls;
- enhancements to systems or operational processes;
- staff training or awareness initiatives;
- product, service, or disclosure improvements.

Such measures shall be implemented in a timely manner and, where relevant, tracked to completion.

14.4. Management Reporting

Oval Ltd shall prepare **periodic internal reports** on complaints for Senior Management and, where applicable, the Board of Directors. Such reports may include, among other matters:

- the number and types of complaints received;
- trends and recurring issues identified;
- resolution timeframes and compliance with regulatory deadlines;
- outcomes of complaints and remedial actions taken; and
- material or high-risk complaint issues.

The purpose of management reporting is to support effective oversight, decision-making, and continuous improvement of consumer protection standards.

14.5. Regulatory Reporting and Access

Where required by law or regulatory request, Oval Ltd shall provide complaint-related information, records, or reports to the **Financial Services Authority of Seychelles (FSA)** in a timely, accurate, and transparent manner.

Oval Ltd shall ensure that complaint monitoring and reporting arrangements are sufficient to support regulatory inspections, thematic reviews, or enforcement inquiries.

15. GOVERNANCE, OVERSIGHT AND RESPONSIBILITY

Oval Ltd shall maintain a clear and effective governance framework to ensure that complaints are handled in accordance with this Policy, applicable consumer protection laws, and regulatory expectations of the **Financial Services Authority of Seychelles (FSA)**.

15.1. Board and Senior Management Oversight

The **Board of Directors** and **Senior Management** of Oval Ltd retain ultimate responsibility for ensuring that:

- an effective complaint handling framework is established, implemented, and maintained;
- this Complaint Handling Policy remains appropriate, effective, and compliant with applicable laws and regulations;
- adequate resources, systems, and controls are in place to support fair and timely complaint handling;
- material, systemic, or high-risk complaint issues are identified, escalated, and addressed appropriately.

Senior Management shall promote a culture that supports **fair treatment of consumers**, accountability, and continuous improvement.

15.2. Compliance Function

The **Compliance Officer** shall have primary responsibility for the oversight of the complaint handling process, including:

- monitoring compliance with this Policy and applicable regulatory requirements;
- overseeing the investigation and resolution of complaints, particularly complex, sensitive, or high-risk complaints;
- ensuring independence and the absence of conflicts of interest in complaint handling;
- maintaining appropriate records and reporting in accordance with Sections 12 and 14 of this Policy;
- acting as the primary point of contact with the FSA in relation to complaints and regulatory enquiries.

The Compliance Officer shall have sufficient authority and independence to discharge these responsibilities effectively.

15.3. Client Support and Operational Functions

Client Support and relevant operational functions shall be responsible for:

- receiving complaints submitted through approved channels;
- registering complaints promptly and accurately in the Complaint Register;
- ensuring that complaints are acknowledged and handled in accordance with prescribed procedures and timelines;
- escalating complaints to the Compliance Officer where required.

All staff involved in complaint handling shall act professionally, objectively, and in good faith at all times.

15.4. Conflict of Interest and Independence

Oval Ltd shall ensure that:

- any individual who was directly involved in the matter giving rise to a complaint shall not participate in the investigation, assessment, or decision-making relating to that complaint;
- appropriate measures are in place to identify, manage, and mitigate conflicts of interest in the complaint handling process.

Independence and objectivity shall be maintained throughout the lifecycle of each complaint.

15.5. Training and Awareness

Oval Ltd shall ensure that relevant employees receive **appropriate training and guidance** on:

- complaint handling procedures and regulatory obligations;
- consumer protection principles;
- confidentiality and data protection requirements.

Training shall be provided on induction and on an ongoing basis, and updated where there are material changes to laws, regulations, or internal policies.

15.6. Review of the Policy

This Complaint Handling Policy shall be:

- reviewed **at least annually**, or more frequently where required due to regulatory changes, operational developments, or identified deficiencies; and
- updated as necessary to ensure continued effectiveness and regulatory compliance.

Any material changes to this Policy shall be approved by Senior Management and communicated to relevant staff.

16. CONTACT DETAILS

All complaints and correspondence may be addressed to:

Compliance Department

Oval Ltd

Email: compliance@ovalmarkets.com

