



COMPLAINTS POLICY



OBJECTIVE OF A COMPLAINTS POLICY

Opensoft LLC maintains an internal complaints resolution procedure for handling client complaints about our services.

The complaints procedure must be based on the following outcomes:

- **Transparency and Visibility:** Ensure that complainants are fully informed about the procedures that will be followed when submitting a complaint.
- **Accessibility of Facilities:** Ensure that clients have an easily accessible facility to submit complaints at any office or branch of Opensoft LLC.
- **Fairness:** Ensure that the complaint resolution process is fair to both the complainant and the company.

To achieve these outcomes, Opensoft LLC has adopted a complaints policy that outlines our commitment to the fair resolution of complaints.

DEDICATION TO ACHIEVING A JUST RESOLUTION OF COMPLAINTS

Opensoft LLC is dedicated to providing financial services with due skill and diligence, always acting in the best interests of clients and maintaining the integrity of the financial services industry.

Despite our high service standards, there may be times when a client prefers to submit a formal complaint against the company. In such cases, Opensoft LLC will follow the complaints procedure outlined below.

The company is committed to a transparent and accessible complaints resolution process that is fair to all parties involved. To achieve these outcomes, Opensoft LLC undertakes the following:

- The procedures for submitting a complaint will be openly disclosed and made readily available to clients in writing.
- We will resolve client complaints through a practical and effectively managed resolution process.
- We will train and empower all relevant staff members to facilitate and resolve complaints effectively.



- We will address complaints in a timely and fair manner, ensuring each complaint receives proper consideration.
- We will take the necessary steps to investigate and respond promptly to a complainant.
- Where deemed necessary, we will appoint an independent mediator to resolve the complaint.
- Where the complaint is resolved in favour of the complainant, we will offer the appropriate level of redress without delay.
- Where the complaint is not resolved in favor of the complainant, we will provide written reasons for our decision and inform the complainant of any rights to escalate the complaint to another forum.
- We will maintain a record of all complaints for a period of 5 years, including an indication of whether or not the complaint has been resolved.
- We will investigate and, where necessary, take appropriate action to avoid and prevent similar circumstances that led to the complaint.

THE INTERNAL PROCEDURE FOR RESOLVING COMPLAINTS

When a complaint is received or a client indicates their intention to submit a formal complaint with Opensoft LLC, the following procedure will be followed:

- Review the company's Complaints Procedure and provide the complainant with a copy.
- If the complaint was initially communicated verbally, instruct the complainant to resubmit the complaint in writing.
- Upon receiving the complaint in writing, record it in the company's Complaints Register within 1 working day.
- Send written acknowledgement of receipt of the complaint to the complainant within 3 working days.
- Inform senior management of the complaint for allocation to a trained and skilled person who can address it.



- Review the company's Professional Indemnity Cover policy and notify the relevant insurers of the complaint and potential claim if necessary.
- The person assigned to handle the complaint will investigate the matter thoroughly. This includes reviewing the file and transaction that led to the complaint.
- The person handling the complaint will discuss their preliminary findings with all relevant internal parties involved.
- The person handling the complaint will respond to the complainant with the preliminary findings. They will also request any additional documents or information from the complainant if necessary, within seven working days. In all cases, the reasons for decisions taken will be provided, and any anticipated deviations from the specified timelines will be communicated.
- If necessary, the complaint will be referred to the relevant product supplier for a response. The complainant will be informed of this development.
- The person handling the complaint, in consultation with the management committee, will formulate a joint response. If necessary, an independent mediator will be appointed.
- Revert to the complainant with a proposed solution and inform them of the option to escalate the matter to the Managing Director of the business within fourteen working days of receipt of the complaint. Provide reasons for decisions taken and communicate any anticipated deviations from specified timelines.
- The company's response may comprise the following:
 - Any proposed settlement deemed appropriate;
 - Suggested remedy for the complaint;
 - Dismissal of the complaint and reasons why;
 - Apology (if applicable) and any disciplinary action that has been taken against the staff members involved; and
 - Identified problems within the company and how they will be resolved
- Update the status of the complaint in the company's Complaints Register and file all relevant correspondence for a period of 5 years.



- If, during the enquiry, the person dealing with the complaint becomes aware that the complaint is of a non-routine or serious nature, the following steps will apply:
 - The supervisor will refer the matter to the Compliance Officer; and
 - The Compliance Officer will make a recommendation on how to proceed with the complaint. This recommendation may suggest referring the matter to the local Financial Ombudsman for an opinion or consulting with an attorney. If consulting with an attorney, their opinion will be sought
- Review the reasons that gave rise to the complaint and implement remedial actions to avoid and prevent similar complaints in the future.
- For the purposes of effective and fair resolution of complaints, all relevant staff of Opensoft LLC will receive adequate training, including imparting and ensuring full knowledge of the provisions of any Act and the Rules on Proceedings of the Office regarding investigation of complaints.

COMPLAINTS PROCESS

A. Purpose of this document

The organization is a licensed Financial Services Provider and has specific obligations to you, our client. One of these obligations is to create a formal complaints resolution process, allowing you to exercise your legal rights.

This document outlines the procedure you need to follow to file a formal complaint with us. Please note that our internal complaints resolution procedure may be modified or discontinued at any time.

B. Complaint must be relevant

Under the Law, a "complaint" refers to a specific issue regarding a financial service provided by a licensee or their representative to the complainant on or after the Law's commencement date. This complaint must allege that the licensee or representative:

- has violated or failed to adhere to a provision of the Law, resulting in or potentially leading to financial harm or damage to the complainant; or
- has intentionally or carelessly provided a financial service to the complainant that has caused harm or disadvantage, or is likely to cause such harm or disadvantage



- has treated the complainant unfairly.

Navigating the intricate financial services landscape can be challenging. We commit to addressing all reasonable client requests, while also directing you to more suitable resources if necessary. Should your concern pertain to any aspect of our service or disclosures that should be made, we will strive to respond in writing within seven days.

If the complaint pertains to matters beyond our control, such as product information or investment performance, we will escalate it to the relevant product supplier. Please note that we retain the right to seek reimbursement for costs or damages incurred due to clients lodging frivolous, vexatious, or unreasonable claims.

C. Complaint must be in writing

To ensure timely and proper handling of your complaint, we kindly request that you submit it in writing within five (5) working days from the occurrence of the event that prompted your complaint. Working days refer to Monday through Friday, excluding public holidays in Saint Vincent and Grenadines, unless stated otherwise. Failure to raise your objection within this specified timeframe of five (5) working days from the event that led to the complaint will be considered as your acceptance and approval of all actions taken by us prior to your complaint. If you wish to formally lodge a complaint, please email it to complaints@woofx.pro along with the necessary supporting documentation. If delivering the complaint by hand or any other means, please ensure you obtain and retain proof of delivery.

D. Procedure

Our internal complaints resolution process is intended to provide fair and effective resolution of complaints. The time periods set-out in this procedure will be adhered to as strictly as possible but may be varied if necessary. The following step-by-step guideline sets out the procedures we will adopt and shows how a complaint will be dealt with, once received by us:

- Your complaint and all communications with regards to your complaint must be in writing. All verbal communications made with regards to the complaint must be confirmed in writing within three days of the communication.
- Please indicate the following information:
 - ✓ Your name, surname and contact details;
 - ✓ Trading Account Number/User ID
 - ✓ A complete description of your complaint and the date on which the financial service that led to your complaint was rendered;
 - ✓ The name of the person who furnished the financial advice or rendered the intermediary service that led to your complaint; and



- ✓ Remedies sought
- ✓ Attach any documentation or other material that may assist in the resolution of the complaint.

- Your complaint will be promptly recorded in our Complaints Register on the same day it is lodged, and we will send you written confirmation of its receipt. We are required by legislation to maintain records of complaints for five years. Please note that the method of communication you choose will influence the speed of our response to your complaint.

- The complaint will be promptly brought to the attention of the senior manager responsible for the relevant department. They will assign it to a trained and qualified individual, specifically the Complaint Dispute Facilitator, who is capable of providing a thorough and appropriate response to your complaint.

- We will discuss the preliminary findings with all relevant internal parties and aim to communicate a proposed solution to you within an additional seven working days. Throughout this process, we will provide you with reasons for our decisions in every instance.

- If our solution does not meet your satisfaction, you can escalate the complaint to our Managing Director. The Managing Director has the authority to modify or uphold the solution. Be aware that some decisions may require approval from the Opensoft LLC management committee. If this is the case, we will inform you and provide the date when the decision will be made.

- If you are still not satisfied with the outcome after referring the complaint to the Managing Director, we will consider the complaint as unresolved.