

COMPLAINT HANDLING POLICY

VG MARKETS LIMITED

How to raise a complaint and how the Company will handle it

September 2026

VGM-LEG-CHP-001 | Version 1.0

PO Box 1212, Hamchako, Mutsamudu, Autonomous Island of Anjouan, Union of Comoros

Company No. 16087

Licence No. L16087/VGM — Anjouan Offshore Finance Authority

CONTRACTS FOR DIFFERENCE AND ROLLING SPOT FOREIGN EXCHANGE ARE COMPLEX LEVERAGED INSTRUMENTS THAT CARRY A HIGH RISK OF RAPID LOSS. YOU CAN LOSE ALL OF THE FUNDS YOU DEPOSIT. THESE PRODUCTS ARE NOT SUITABLE FOR EVERY INVESTOR. YOU SHOULD CONSIDER WHETHER YOU UNDERSTAND HOW THEY WORK AND WHETHER YOU CAN AFFORD THE HIGH RISK OF LOSING YOUR MONEY.

VG MARKETS LIMITED | COMPANY NO. 16087 | LICENCE NO. L16087/VGM | ANJOUAN OFFSHORE FINANCE AUTHORITY

Document title	Complaint Handling Policy
Document reference	VGM-LEG-CHP-001
Version	1.0
Issuing entity	VG Markets Limited (Company No. 16087)
Licence	International Brokerage and Clearing House Licence No. L16087/VGM, issued by the Anjouan Offshore Finance Authority under Government Notice No. 005 of 2005
Owner	Head of Compliance
Approved by	Board of Directors
Effective date	1 September 2026
Next scheduled review	31 August 2027
Retention period	Seven (7) years from the date of closure of the complaint
Classification	Public — published on the Company website

1. INTRODUCTION AND SCOPE

VG Markets Limited (the “**Company**”, “**we**”, “**us**” or “**our**”) is a company incorporated in the Autonomous Island of Anjouan, Union of Comoros, under Company Number 16087, holding International Brokerage and Clearing House Licence No. L16087/VGM issued by the Anjouan Offshore Finance Authority (the “**Authority**”) under Government Notice No. 005 of 2005.

The Company is committed to providing services in a fair, transparent and professional manner. This Complaint Handling Policy (the “**Policy**”) sets out how a client may raise a complaint, how the Company will investigate and respond to it, and what a client may do if they remain dissatisfied with the outcome.

The Company treats complaints as a source of information about the quality of its services. Complaints are recorded, analysed for root cause and reported to the Board, and findings are used to correct the underlying issue and not only the individual case.

This Policy applies to complaints made by or on behalf of any client or former client of the Company in respect of any service provided, or not provided, by the Company. It applies to all personnel involved in receiving, investigating or responding to complaints. It is published on the Company website and is provided to clients on request at no charge.

2. DEFINITIONS

Term	Meaning
Complaint	Any expression of dissatisfaction, whether oral or written, and whether or not justified, made by or on behalf of a client, relating to the provision of, or failure to provide, a service by the Company.
Complainant	A client or former client of the Company, or a person duly authorised to act on their behalf.
Business Day	Any day other than a Saturday, Sunday or a public holiday in the Union of Comoros.
Final Response	A written response from the Company which either (a) accepts the complaint and, where appropriate, offers redress; (b) offers redress without accepting the complaint; or (c) rejects the complaint and gives the reasons for that decision.
Complaints Register	The central record maintained by the Compliance function in which every complaint is logged and tracked to closure.

3. HOW TO RAISE A CONCERN OR SUBMIT A COMPLAINT

3.1 Step one – Client Support

If you have a query about your account, or you are dissatisfied with any aspect of our service, you should in the first instance contact the Client Support team at support@vgmarkets.com, or through any other official channel published by the Company. Most matters can be resolved at this level without a formal complaint.

Client Support will attempt to resolve your query immediately. Where immediate resolution is not possible, Client Support will normally revert within **two (2) business days**. If more time is required, you will receive a written holding response indicating when you will next be contacted.

3.2 Step two – formal complaint to Compliance

If you are not satisfied with the response received from Client Support, or if you prefer to raise the matter formally at the outset, you may submit a complaint directly to the Compliance function at any time. You are not required to contact Client Support first.

A complaint may be submitted through either of the following channels:

By email	compliance@vgmarkets.com
In writing	The Head of Compliance, VG Markets Limited, PO Box 1212, Hamchako, Mutsamudu, Autonomous Island of Anjouan, Union of Comoros

You may use the Complaint Form at **Appendix A** to this Policy, or set out your complaint in your own words provided you include the information listed in Section 4. There is no charge for making a complaint, and you do not need to use a lawyer or a paid representative in order to do so.

3.3 Timing

You are encouraged to raise a complaint as soon as reasonably practicable after the matter complained of occurs. Delay may make it more difficult for the Company to investigate the matter fairly, particularly where the complaint concerns market conditions or platform behaviour at a specific point in time.

3.4 Complaints made on your behalf

Where a complaint is submitted by a person acting on your behalf, the Company will require documentary proof of that person's authority to act before it discloses account information or issues a substantive response.

3.5 Withdrawing a complaint

You may withdraw a complaint at any time. The Company will ask you to confirm the withdrawal in writing and will record it in the Complaints Register.

3.6 Conduct

The Company will accept and investigate every complaint on its merits, regardless of the tone or language in which it is expressed. Where communication is abusive, threatening or unreasonably persistent, the Company may require that further communication be conducted in writing only, or restrict it to a single named point of contact, and will notify you if it does so. **The merits of your complaint will be assessed objectively in every case.**

4. INFORMATION REQUIRED

To enable a prompt and fair investigation, your complaint should include:

- your full name and trading account number;
- your contact details, including the email address registered on your account;
- a clear description of the complaint, including the relevant dates, times (with time zone), instruments, ticket or transaction numbers and any other parties involved;
- details of any previous communication with the Company on the matter and the outcome of that communication;
- the amount in dispute, if any, and the currency; and
- any supporting documentation, such as screenshots, statements or correspondence.

The information requested is indicative. The Company may request further information, clarification or evidence during the investigation, including updated due diligence or account verification documentation, and your cooperation is expected. The Company may extend the investigation timeframe, or place the matter on hold, where you have not responded adequately or within a reasonable period; where it does so it will tell you in writing.

Information submitted in support of a complaint must be truthful, complete and accurate. The Company may ask you to resubmit a complaint where the information provided is materially incomplete or inaccurate.

5. COMPLAINT HANDLING PROCEDURE

Step	Action	Timeframe
1. Acknowledgement	The Company acknowledges receipt of the complaint in writing, confirms the reference number allocated to it and identifies the person handling it.	Within 2 business days of receipt
2. Logging and allocation	The complaint is logged in the Complaints Register and allocated to an investigating officer independent of the person or function complained of. Compliance oversees the process. Where the complaint concerns the Compliance function itself, it is escalated to the Board or to an independent officer appointed for the purpose.	Within 2 business days of receipt
3. Investigation	The investigating officer conducts a fair, impartial and thorough investigation, reviewing account records, trading and platform logs, communications and any other relevant evidence.	Ongoing
4. Standard Final Response	The Company issues its Final Response in writing (see clause 5.1).	Within 21 business days of receipt where reasonably practicable
5. Holding response	Where the complaint is complex and cannot be concluded within 21 business days, the Company issues a written holding response explaining the reason for the delay and giving an estimated date for the Final Response.	Where unresolved after 21 business days, written update explaining reasons for delay
6. Outer limit	The Final Response will be issued no later than 60 business days from the date of receipt. Where the Company is unable to conclude the complaint within this period because material information reasonably required from the Complainant remains outstanding, or because of circumstances outside the Company's reasonable control, the Company will provide a written explanation, identify the information or circumstance causing the delay, and provide an updated estimated completion date.	Final Response within 60 business days of receipt, subject to clearly defined exceptions
7. Closure	Where the Complainant does not respond to the Final Response within 8 weeks, the Company issues two documented follow-up communications, the second being a final written notice, after which the complaint is recorded as resolved and closed.	8 weeks from the Final Response

5.1 Content of the Final Response

The Final Response will be issued in writing and will set out:

- a summary of the complaint as the Company understands it;
- the scope of the investigation carried out and the evidence considered;
- the Company's decision and the reasons for it, in plain language;
- any offer of redress or remedial action, and how to accept or decline it; and
- what you may do if you remain dissatisfied, as set out in Section 8 of this Policy.

Closure of a complaint by the Company, including closure by reason of non-response, does not prevent you from raising the matter again if you provide new information, nor does it affect any right you may have to pursue the matter by other means.

5.2 Investigation Standard

The Company shall ensure that complaint investigations are conducted fairly, objectively and proportionately to the nature and complexity of the complaint. The investigator shall consider all reasonably relevant evidence, including where applicable account records, transaction records, order and execution records, platform logs, telephone recordings, emails, chat records, payment records, account history, applicable terms and conditions, internal procedures and relevant communications with the client.

Where the complaint concerns trading execution, pricing, slippage, stop-out, margin, platform availability or other trading-related matters, the investigation shall, where relevant, reconstruct the circumstances using contemporaneous system and transaction records rather than relying solely on recollection or client-facing screenshots.

The investigator shall document the principal facts established, evidence considered, conclusions reached and reasons for the outcome.

6. CONFIDENTIALITY AND CONFLICTS OF INTEREST

All complaints are handled in strict confidence. Information relating to a complaint is disclosed only to those persons directly involved in its investigation and resolution, to the Company's professional advisers, or where disclosure is required by law or by the Authority.

No person may investigate or determine a complaint in which they are personally implicated, or in which they have any other interest that could reasonably be expected to affect their impartiality. Where such a conflict arises, the matter is reassigned to an independent officer. Conflicts arising in the complaints process are managed in accordance with the Conflicts of Interest Policy (VGM-LEG-COI-001).

Personal data collected in connection with a complaint is processed in accordance with the Company's Privacy Policy.

7. RECORD KEEPING AND THE COMPLAINTS REGISTER

The Company maintains a central Complaints Register recording, for each complaint:

- the complaint reference number and the Complainant's identifying details;
- the date the complaint was received and the date it was acknowledged;
- the category and nature of the complaint, and the product or function concerned;
- the investigating officer and the steps taken;
- the findings, the decision and the date of the Final Response;
- any redress offered, its value and whether it was accepted;
- the root cause identified and any corrective action taken; and
- the date of closure.

All complaint records, including correspondence, platform logs and supporting documentation, are retained for a minimum of **seven (7) years** from the date of closure. Records are stored securely, treated as confidential, and made available to the Authority on request. The seven-year period applied by the Company exceeds the statutory minimum applicable in the Autonomous Island of Anjouan and is applied consistently across the Company's record-keeping framework.

Compliance reports to the Board at least twice per calendar year on complaint volumes, categories, root causes, redress paid and outstanding remedial action.

8. IF YOU REMAIN DISSATISFIED

The Final Response concludes the Company's internal complaint handling process. If you remain dissatisfied, the following options are available to you.

8.1 Ask the Company to reconsider

You may ask the Company to reconsider its Final Response where you are able to provide information or evidence that was not available to the investigating officer. A request for reconsideration should be sent to compliance@vgmarkets.com and will be reviewed by a person senior to, and independent of, the original investigating officer.

8.2 The Anjouan Offshore Finance Authority

If you remain dissatisfied following completion of the Company's internal complaint handling process, you may raise your concerns with the Anjouan Offshore Finance Authority ("AOFA"), the Company's licensing and supervisory authority.

AOFA provides a mechanism through which concerns regarding licensed entities may be submitted to the Authority. Clients should provide the Company's name and licence number, together with sufficient information and supporting evidence concerning the matter complained of.

AOFA's consideration of a complaint is subject to its statutory powers, applicable procedures and regulatory remit. The Company cannot guarantee the outcome of any complaint submitted to AOFA, and AOFA may determine the appropriate action to take in accordance with its regulatory responsibilities.

8.3 No external dispute resolution scheme

Unless otherwise expressly stated in the Client Agreement or required by applicable law, the Company does not participate in a statutory financial-services ombudsman or investor compensation scheme applicable to its Anjouan international brokerage business.

Clients should consider the availability of external dispute resolution, compensation or other investor-protection arrangements applicable to them before opening or maintaining an account with the Company.

8.4 Legal remedies

You retain any rights and remedies available to you under the dispute resolution and governing law provisions of the Client Agreement between you and the Company, and under applicable law. Nothing in this Policy limits, or is intended to limit, those rights. You may wish to take independent legal advice.

9. GOVERNANCE, REVIEW AND TRAINING

This Policy is owned by the Head of Compliance and approved by the Board of Directors. It is reviewed at least annually, and additionally following any material change to the Company's business, licence conditions or applicable law, or in response to a significant complaint, incident or adverse audit finding. The next scheduled review date is **31 August 2027**.

All personnel who may receive or handle a complaint receive training on this Policy on induction and at least annually thereafter, covering complaint identification, escalation, investigation standards, record keeping and the fair treatment of clients. Training completion is recorded.

The Company may amend this Policy at any time. The current version is published on the Company website, and material changes are notified to clients where required by law or by the Client Agreement.

10. CONTACT

Client Support	support@vgmarkets.com
Complaints / Compliance	compliance@vgmarkets.com
Head of Compliance	VG Markets Limited, PO Box 1212, Hamchako, Mutsamudu, Autonomous Island of Anjouan, Union of Comoros
Website	www.vgmarkets.com

Approved by the Board of Directors of VG Markets Limited. Effective 1 September 2026. This Policy supersedes no previous version.

APPENDIX A. COMPLAINT FORM

Please complete this form and submit it to the Compliance function at **compliance@vgmarkets.com**. Fields marked with an asterisk (*) are mandatory. The form must be completed truthfully, completely and accurately. You may instead set out your complaint in your own words, provided you include the information listed in Section 4 of this Policy.

Part A – Client and general information

Full name*	
Trading account number*	
Contact telephone number*	
Email address registered on the account*	
Residential address*	
Nationality*	
Country of residence*	
Have you already raised this matter with Client Support?*	Yes / No
If yes, please give the date, the reference and the outcome of that communication	

Part B – Complaint details

Date(s) and time(s) of the incident, including time zone*	
Instrument(s), ticket or transaction number(s) concerned	
Description of the complaint — please set out the facts, the reasons for your complaint and how the matter has affected you*	
Amount in dispute and currency, if applicable	
How do you consider this matter could be resolved?	

Part C – Supporting documents

Please attach copies of any relevant documents, such as account statements, platform screenshots, trade confirmations or correspondence. Please list the documents attached:

Documents attached	
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Part D – Declaration

I confirm that the information provided in this form is true, accurate and complete to the best of my knowledge and belief, and that I am the account holder or am duly authorised to act on the account holder's behalf.

Signature		Date	
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For internal use only

Complaint reference number	
Date received	
Received by	
Date acknowledged	
Investigating officer	
Holding response issued (date, if applicable)	
Final Response date	
Redress offered / accepted	
Root cause category	
Status	
Date closed	