# Complaints Handling Procedure
# Orinoco (Pty) Ltd
# (FSP Number: 51913)

Company Name
Orinoco (Pty) Ltd
Physical Address
Workshop 17, Hyde Park Corner
Office 219 & 221 2nd Floor
North Tower, 6th Road
Hyde Park, Johannesburg
2196
License Number
51913
Website
www.finorinoco.com
Email
complaints@finorinoco.com

**Introduction**

Orinoco (Pty) Ltd (the "FSP", the "Company" or "we"/ "our") is a private limited liability company registered in South Africa under registration number 2021/704761/07 and is authorised by the Financial Services Conduct Authority (the "FSCA") to operate as a Financial Services Provider under license number 51913.

As such, the Company is required to establish, implement, and maintain an effective and transparent complaint handling policy and procedure for the prompt handling of Clients' complaints in accordance with the Financial Advisory and Intermediary Services Act ("FAIS Act").

The FSP is constantly searching for new ways of improving Client service experience through innovative ideas and personal attention. Client Complaints will be facilitated as fairly, effectively and promptly as possible. Feedback from Clients is highly valued as it gives the FSP the opportunity to constantly advance service delivery and processes by resolving any Complaints in a satisfactory manner.

This Complaint resolution procedure ("Procedure") sets out the process adopted by Orinoco Capital (Pty) Ltd for reasonable and prompt handling of complaints, disputes or grievances addressed to the Company by the Clients.

Orinoco only accepts complaints submitted via email to **complaints@finorinoco.com** . No other form of communication will be considered or accepted. Please make use of the Complaint Form attached at the end of this Policy.

Complaints relating to a Product Supplier must be submitted directly to the relevant Product Supplier. Should a Client submit a complaint to the incorrect company, Orinoco may, at its discretion, forward the complaint to the appropriate party; however, the responsibility remains with the Client to ensure that the complaint is submitted through the correct channel.

**Complaints Management Mission**

The Company will maintain an effective Procedure to ensure prompt resolutions of written Complaints by means of:

- Enabling easy access to the dispute resolution policies and procedures to the Clients;

- Taking all necessary steps to investigate the Complaint after receipt and recording thereof, offering proper consideration;

- Addressing and resolving any Complaints received in a timely and fair manner;

- Being transparent in the resolution process;

- Ensuring that responsibilities and mandates are delegated to facilitate disputes and an escalation process to staff with adequate expertise to improve services and dispute resolution systems and procedures where necessary;

- Furnishing the Client with comprehensive reasons and providing procedural advice and contact details of the relevant regulatory body in the instances where the outcome of a dispute is not satisfactory to the Client;

- Maintaining appropriate records of all Complaints for a period of 5 (five) years.

**Complaints**

- ***Complaints must be relevant***

In terms of the FAIS Act https://www.gov.za/documents/financial-advisory-and-intermediary-services-act, a "complaint" means a specific complaint relating to a financial service rendered by the FSP or a representative of the FSP, to the complainant on or after the date of commencement of the FAIS Act, and in which complaint it is alleged that the FSP or representative:

- has contravened or failed to comply with a provision of the FAIS Act and that as a result thereof the complainant has suffered or is likely to suffer financial prejudice or damage; or

- has willfully or negligently rendered a financial service to the complainant which has caused prejudice or damage to the complainant, or which is likely to result in such prejudice or damage; or

- has treated the complainant unfairly

The financial services environment is complex. We will endeavor to address all reasonable requests from our clients. Where the complaint relates to any aspect of our service, or any disclosures that ought to be made by us, we will endeavor to address those complaints in writing, within fifteen (15) days.

- ***Complaints must be in writing***

In order for a complaint to receive the attention that it deserves, we request that your complaint be submitted to us in **writing**, no later than three (3) days after the incident, and must reflect accurate and clear information of the incident for which you wish to complain about.

- ***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 in connection with your complaint must be in **writing**. All verbal communications made in connection with the complaint must be confirmed in writing within three (3) days of the communication.

The Complaint **MUST** contain:

- First and last name of the Client (or the company name, if the Client is a legal entity);
- Client's account details in the Trading Platform (that is, the Account number);
- Details of when the incident first arose (date and time in the Trading Platform time);
- Ticker of the previous complaint in question (if applicable);
- Description of the situation supported by the reference to the Agreement (where applicable);
- Copies of all relevant documents attached.

The Complaint **MUST NOT** contain:

- Affective appraisal of the conflict situation
- Offensive language
- Uncontrolled vocabulary
- Information that is not relevant.

Upon receipt of the Complaint the Company shall do the following:

**Step 1:**
Complaint will be sent to Senior Management who will then assign a skilled person to deal with the complaint

**Step 2:**

You will receive a confirmation of your complaint with within **5 business days** from the day the FSP has received your complaint in writing

**Step 3:**
The complaint will be investigated and you will receive communication about our preliminary findings within **15 business days** from the receipt of the complaint in writing unless the complaint is solved within this time and both parties are satisfied. If both parties are satisfied, this will be the last step on the Complaints Procedure.

**Step 4:**
Preliminary findings will be discussed with internal management and a final finding will be communicated with you within **30 business days** from the receipt of the complaint in writing.

**Step 5:**
If we are unable to furnish you will a response until after 30 business days from the receipt of the complaint you will be assigned under "Exempted Complaints" and the reason for that and procedure will be shared with you

No person who is directly involved in the Complaint is allowed to investigate the same and the investigation shall be carried out by another Senior Employee. No matter the outcome of the matter, the nature of the Complaint will be investigated to ensure that remedial action is taken to avoid that a similar Complaint arises in the future.

**Complaints procedure unsuccessful**

If you are not satisfied with the outcome, we will regard the complaint as being unsatisfactorily resolved. In such a case, you may approach the office of the Ombud for Financial Services Providers or take other steps as may be advised by your legal representatives.

The Ombud acts as an adjudicator in disputes between clients and financial services providers. The referral to the office of the Ombud must be done in accordance with the provisions of section 21 of the Financial Advisory and Intermediary Services Act 2002 and the rules promulgated in terms of that section.

In instances where we have not been able to arrive at a resolution within six (6) weeks after you have submitted your complaint, the matter may automatically be referred to the Ombud. The Ombud acts independently and objectively and has jurisdiction in respect of complaints relating to advice or intermediary services, which has arisen after 15 November 2002.

You must, if you wish to refer a matter to the Ombud, do so within six (6) months from the date of the notice in which we inform you that we are unable to resolve the complaint to your satisfaction. The Ombud will not adjudicate matters exceeding a value of R3,500,000.

The Ombud may be contacted at their offices in Pretoria at the following address:

**Physical address:**
Menlyn Central Office Building, 125 Dallas Avenue,
Waterkloof Glen, Pretoria 0010

**Postal address:**
P O Box 41, Menlyn Park, 0063

**Tel:** 012 762 5000
**Sharecall:** 086 066 3247

**Email:** info@faisombud.co.za

**Website:** www.faisombud.co.za

**Rights and Duties of the Company**

The Rules governing the proceedings of the office of the FAIS Ombud make provision for the following rights and duties of the Company:

- The Company has a right to be informed of the Complaint submitted to the Ombud to enable the Company to respond thereto fully;
- The Company may submit any information or documentation that is relevant to the Complaint;
- The Company has a duty to submit further information if so requested by the Ombud and if needed, to discuss the matter with the Ombud;
- The Company has a duty to act professional and reasonable;
- The Company must cooperate with a view to ensuring efficient Resolution of the Complaint.

**Adoption**

The Key Individual of Orinoco Capital has adopted this policy

Date 28 September 2026

**Complaint Form**

Please fill in the Complaint Form and submit it electronically to complaints@finorinoco.com.

The Form must be filled out truthfully, completely and accurately.

We reserve the right to dismiss a Form which is not completed accurately and/or it comprises obscene/rude words and/or insults or threatens the Company or its representatives or the Product Supplier.

If your complaint relates to Trading (i.e. Execution of orders, trading platforms, etc.) or Payments (i.e. Deposits, Withdrawals) we encourage you to raise the matter to the Product Supplier by following their process prescribed in the Complaints Handling Policy of the Product Supplier https://www.octatrade.co/ under the "Legal Documents" Section.

All fields are mandatory

**1. Personal Information**
Name
Surname/Name of Legal Entity
ID Number/Passport Number/Registration Number of Legal Entity
Nationality
Address
Country of Residence
Is your complaint related to Trading (i.e. Execution of orders, trading platforms, etc.) or Payments (i.e. Deposits, Withdrawals)
If your answer is yes, please send your complaint to support@octatrade.co

**2. Complaint Details**
Date(s) of incident(s):
Description of the facts and reasons of your complaint, and how the incident has affected you. Please be clear and concise.

Your suggestions in relation to settling this dispute

Please attach supporting documentation and evidence that may assist us with the investigation.

I hereby certify and confirm that to the best of my knowledge, the information furnished above is true, accurate, correct and complete.

Name
Date
Signature