

Upin Global Ltd

COMPLAINT HANDLING PROCEDURE

The below sets out the process when Upin Global Ltd (the "Company") is handling any complaint a client may have in respect to any investment and ancillary services provided by the Company.

The Company has appointed a Compliance Officer to efficiently handle any complaints from the Client. This is to allow the Company to resolve and apply mandatory measures to avoid any recurring issues.

Definition of complaint

The Company classifies a complaint as any grievance involving the activities of those persons under the control of the Company (Employees), in connection with the provision by the Company of the investment and/or ancillary services it provides.

The procedure

The Compliance Officer shall be responsible for handling Client complaints, except in the case where the complaint involves the Compliance Officer, whereby the complaint shall be handled by the Managing Director.

The Company tries to ensure independence via the Compliance Officer which enables complaints to be investigated fairly and possible conflicts of interest to be identified and mitigated.

The Complainant may register a complaint by completing the Form at the end of this Policy.

Any Client's complaints received will be forwarded to the Compliance Officer;

The Company will endeavor to ensure all Communication is in plain language which is clearly understood.

When the Compliance Officer receives the Complainant's complaint then a written acknowledgement will be sent to the Complainant confirming the same. It shall include:

- the Complaint Reference Number
- the name and job title of the person dealing with the complaint

The Acknowledgement will be sent to the Complainant within (2) working days from the date the complaint has been received.

This Acknowledgement will confirm the necessary action required to resolve the complaint and will contain details of our Complaints Handling Procedure, and of your right to refer the Complaint to the Financial Ombudsman if you are dissatisfied with our assessment and ruling.

The Company will then gather and investigate all relevant evidence and information regarding the complaint.

The Company will provide an Initial response without any unnecessary delay and within 10 (ten) working days from the date that the Compliance Officer receives the Client's complaint. When an answer cannot be provided within the expected time limits, the Company will inform the complainant about the causes of the delay and indicate when the Company's investigation is likely to be completed.

The final response will be sent to the Complainant explaining the findings of the investigation and any offer of redress if applicable. In the case where a holding response is sent to the Complainant, then an explanation shall be given stating the reasons why the Company has not been able to resolve the complaint as well as giving an estimated time to resolve the issue. This will be no longer than 1 month from the date of the Complaint.

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If after 1 month of receiving the complaint, the Company is still not in a position to resolve the issue then the Compliance Officer will notify you in writing stating the reasons for the delay and indicate an estimated time to resolve the issue.

The client may refer the complaint to The Anjouan Offshore Finance Authority of the Union of Comoros (AOFA) within one (1) month of the date of the final response.

When the complainant has received the final response, he will have 1 week to respond. If no response has been received from the complainant indicating that he is still dissatisfied with the explanation then the Complaint will be considered as resolved.

Complaints register

The Company stores all complaints it receives on an internal archive, as quickly as possible, and in an appropriate manner.

The Company is required to provide to the AOFA information regarding the complaints it receives via an electronic form to the Commission on a trimonthly basis.

Amendments

The Company analyses, on an on-going basis, complaints handling data, to ensure that they identify and address any recurring or systemic problems, and potential legal and operational risks, for example by:

- Analyzing the causes of individual complaints so as to identify root causes common to types of complaints,
- Considering whether such root causes also affect other processes or financial means, including those not directly complained
- Correcting, where reasonable to do so, such root causes.