

November 2024

License no. GB23201735

# WISUNO CAPITAL LIMITED

## Customer Complaint Policy

Updated as at 14.11.2024

Version 3.0

**WISUNO CAPITAL LIMITED** is an Investment Dealer (Full-Service Dealer, excluding Underwriting), regulated by the **Financial Services Commission ('FSC')** in Mauritius (hereinafter referred to as the "Company").

This Policy regulates effective, clear and fast handling of complaints and disputes submitted to the Company in relation to the performance and procedures of the Company.

### 1. Introduction

The Company is committed to providing high-quality services to its clients. In the event that a client is dissatisfied with any aspect of our services, the Company has established a comprehensive Complaints Resolution System to address and attempt to resolve such concerns promptly and fairly.

### 2. Risk & Complaints Officer (RCO)

The Company has designated a Risk and Complaints Officers ("RCO) who reports directly to the board of the Company (the "Board"). The RCO will be responsible for overseeing the handling of complaint reviews and ensuring the effective resolution of all client complaints. All clients' complaints against the Company shall be addressed to [complaint@wisunomu.com](mailto:complaint@wisunomu.com).

### 3. Complaint Handling Timeframe

Upon receipt of a complaint, the Company will acknowledge it promptly and attempt in its best capacity to resolving it within thirty (30) days. The RCO shall oversee the transparent, independent, courteous, and efficient handling of all complaints, ensuring their resolution within the specified timeframe, as far as possible.

|  |                 |
|--|-----------------|
| Formal complaints shall be formally acknowledged within five working days.   | 5 working days  |
| Full reply will be made (as far as possible)   | 21 working days |
| <i>*In case a full reply cannot be made within 21 working days of receipt, we shall advise the complainant accordingly and let the complainant know when a reply in full will be made.</i> |                 |
| Resolution of complaint (as far as possible)   | 30 working days |

The Company shall inform the complainant of any changes in the timeframe at the earliest.

The RCO must ensure that any conflicts of interest that arise are declared to the Board Members of the Company.

If a complainant remains dissatisfied with the proposed solution(s), they may contact the customer support team to provide specific clarifications regarding their concerns. The team will review the complaint objectively, on its merits, and with the guidance of Board members and the Compliance Team. Efforts will be made to address the complaint in a fair, unbiased, and equitable manner.

If the complaint is still not satisfied with the resolution proposed and actions taken, the complainant may lodge an appeal at the Financial Services Commission (Mauritius) to the Office of Ombudsperson for Financial Services.

Address: 8th Floor, SICOM Tower, Wall Street, Ebene Cybercity 72201.  
Telephone: (+230) 460 0473/4  
Email: [ombudspersonfs@ofsmauritius.org](mailto:ombudspersonfs@ofsmauritius.org)  
Website: <https://www.fscmauritius.org/en/consumer-protection/complaints-handling>

#### **4. Registration of Complaints**

It is important for the Complainant to ensure that inquiries are not confused with complaints and are addressed to the right team and email address for timely and appropriate assistance.

A complaint for the purposes of this policy shall refer to written expression of dissatisfaction/grievance for which redress is being sought, and which has not been addressed by the customer support department, in relation to the Company's product(s)/service(s). Complaint shall be differentiated from customer feedback and customer opinion.

If the customer's grievance falls within the definition of complaint, then the member of the Complaints Handling Team will register the complaint to the Complaints Register by allocating a unique reference number to the complaint which will be communicated to the complainant in the acknowledgement within 5 working days.

In case the Company receives a notification through the line of communication established by the Company to receive complaints, but which does not fall within the definition of "complaint" above and can be characterized as an inquiry or request, this shall be forwarded to the relevant department to be handled accordingly and the Complainant shall be informed of such action.

If the complaints handling team or customer support department has questions regarding a complaint, those questions shall be raised with the complainant in writing via email.

The Company pays special attention to avoid collecting data about the complainant with the exception of recording data aimed to settle the complaint. Furthermore, the Company manages complaints within a transparent system; complaints shall be traced and administered in each and every stage of the procedure.

#### **5. Managing Complaints**

During complaint investigations, the Company will thoroughly examine and assess the following:

- The facts and the information provided by the complainant.
- The facts and the information provided by the officer responsible for the provision of those services (if applicable)
- The information/data which have been retrieved from the Company's archive (i.e. the complainant's transactions, trading history, correspondence, electronic email, recorded telephone calls, IT data etc)
- The events leading to the complaint

The Company deals with all complaints and all complainants equally, without any discrimination, in harmony with the procedure regulated by this Policy.

All complaints shall be taken seriously, handled transparently and promptly investigated.

#### **6. Complaints Register**

The Company shall maintain a Complaints Register to record all complaints received. The register will include the date of the complaint, acknowledgment date, nature of complaints, and actions taken.

## **7. Monitoring of Complaints**

After settling the complaint, the Company shall preserve every document related to complaints for a period of seven (7) years, after customer's trading account closure, electronically. The Complaints Handling Supervisor shall be responsible for monitoring of complaints and closure of complaints.

The Company shall be entitled to prepare statistics and reports about complaints, which will be aimed to improve the efficiency of administering complaints.

## **8. Review and Amendment**

This Complaint Policy shall be reviewed annually or within such period of time as may be determined by the Company subject to changes in local laws and regulations, to ensure its effectiveness. Any necessary amendments will be made to enhance the Company's commitment to handling complaints transparently and improving overall service quality.

The Company must develop and put into practice an independent and objective complaints resolution system, as provided below.

## **9. Standards for handling complaints**

- (a) All complaints shall be dealt with due attention, whether they are formal or informal.
- (b) Complaint(s) will be treated in confidence, whatever such complaints.
- (c) Complaint(s) shall be dealt promptly.

## **10. Confidentiality**

All complaints received will be dealt with confidentially and in accordance with the requirements of the Data Protection Act 2017.