



smart investment

LEGAL DOCUMENTATION

# COMPLAINTS POLICY

One Code Capital is a trademark of OCC Smart Investment

## Introduction

OCC Smart Investment, hereinafter referred to as the “Company” or “OCC” is incorporated in the Saint Vincent and the Grenadines with Certificate of Incorporation No. 3148577-7. The Company’s head office is located at, I. Kelroy Sutherland, 4145, officer room 27

## Scope of the Complaint Handling Procedure

The Company maintains effective and transparent procedures for the reasonable and prompt handling of complaints received from complainants and keeps records of each complaint as well as the actions taken to remedy the situation.

If after 5 weeks of receiving the complaint, we are 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; When the complainant has received the final response, he will have 5 weeks 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;

## Definition

A complaint, is a statement of dissatisfaction addressed to the Company by a natural or legal person relating to an investment service provided by the Company.

A complainant, is any person, natural or legal person who is presumed to be eligible to have a complaint considered by a firm and who has already lodged a complaint.

The complaints must be directed by the complainant to the Company’s Compliance Department by filling out the relevant forms (Form in Appendix 1 for Trading Operations complaints, and Form in Appendix 2 for Non-Trading Operations complaints) and submit to the Company via the following methods:

I. By email: [complaints@occ.markets](mailto:complaints@occ.markets)

b. By post or in person at the Company's Headquarters as can be seen in the Appendix, a complaint shall include:

The client's full name

The client's trading account number

The affected transaction numbers, if applicable

The date and time that the issue arose

A description of the issue

A complaint must not include offensive language directed either to the Company or a Company employee. In case the Company receives a notice 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 enquiry; this shall be categorized as an enquiry rather than a complaint and will be forwarded to the relevant department to be handled accordingly. The complainant maintains the right to request for the re-classification of his enquiry as a complaint.

Process for Handling

The Compliance Department shall efficiently handle any complaint received by the complainants. In case that the complaint involves the Compliance Department, the complaint shall be handled by a member of the Senior Management.

Further to the above, the Compliance Department shall follow the procedure depicted below when handling complaints:

1.1 Once the complainant files a complaint, an electronic acknowledgement of receipt will be sent to the email address of the complainant to ensure that the Company has received the complaint and is currently working on a resolution. The Company

should also provide to the complainant via this email; a reference number of the complaint for future reference.

1.2 The Company upon examining the complaint and upon reaching a decision in this respect, shall reply to the complainant with the remedial actions to be taken or provide further clarifications, and the reasoning behind the Company's decision, as applicable.

1.3 The Company shall document and keep in its records the following information: the identity of the complainant who filed the complaint the name of the employee who undertook to provide the service to the complainant iii. the date of receipt of complaint/enquiry the subject and full description of the complaint/enquiry the remedial action taken and/ or further clarifications provided to the complainant When the Compliance Officer receives the Client's complaint then a written acknowledgement will be sent to the Client confirming the name and job title of the person dealing with the complaint. This Acknowledgement will confirm the Complaint Reference Number and any necessary action required to resolve the complaint and will contain details of our Complaints Handling Procedure The Acknowledgement will also inform the Complainant of their right to refer the Complaint the Financial Ombudsman if they are dissatisfied with our assessment and ruling. The Compliance Department shall: Send an initial response to the client within seven (7) business days Resolve complaints as soon as reasonably practicable Inform the client accordingly.

When deemed necessary, the Compliance Department shall submit to the Senior Management the aforementioned details, for further investigation. In this case, the Company might take additional time to finalize the reply and therefore it shall duly notify the complainant about the causes of the delay and indicate when the Company's investigation is likely to be completed.

The Senior Management shall investigate further and coordinate with relevant heads of departments to attend to the subject of the complaint. A final response or a holding response will be sent to the complainant explaining the findings of the investigation. Where a holding response is warranted, the Company shall state the reasons why it has not been able to resolve the complaint and provide an indication of the time needed to resolve the issue.

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.

If after 8 weeks 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 Company will endeavor to resolve all complaints within 3 months. In case the final decision does not satisfy the complainant's demands, the latter may maintain the complaint through the Financial Supervisory Commission. Further information about the procedures for communicating with the Financial Securities Commission.

All complaints shall be treated confidentially. The Company will endeavor to ensure all Communication is in plain language which is clearly understood.

#### Reporting and Record Keeping

All decisions related to complaints shall be communicated to complainants in writing and copies shall be retained by the Compliance Department

#### 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 FSC information regarding the complaints it receives via an electronic form to the Commission on a monthly basis.

#### FAQs

Questions regarding this Procedure should be addressed, in the first instance, to the Customer Support Department.

## 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: (a) Analysing 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 of; and Correcting, where reasonable to do so, such root causes.

## Complaint Forms

### Appendix 1

Name	
Surname	
Email	
Account	
Date/Time of the disputed situation (in EET, MetaTrader server	
Number of all contested positions and/or pending orders	
Brief description of disputed situation	

### Type: Trading

Clause(s) in the current Order Execution Policy which, in the complainant's opinion, have been breached

How you feel this dispute could be settled

Please accompany this form with a screenshot of your Trading Terminal if you feel it would further support your claim.

Appendix 2

**Type: Non-Trading Operations**

Name

Surname

Email

Account

Date/Time of the disputed situation (in EET, MetaTrader server

Brief description of disputed situation

Clause(s) in the current Order Execution Policy which, in the complainant's opinion, have been breached

How you feel this dispute could be settled

Please accompany this form with a screenshot of your Trading Terminal if you feel it would further support your claim.