

**COMPLAINTS
HANDLING POLICY**

November 2025

1. Introduction

In2Markets Ltd. (hereinafter the “Company”, “We” or “Us”) is a Cyprus Investment Firm (hereinafter the “CIF”) incorporated and registered under the laws of the Republic of Cyprus, with registration No. HE 333743. The Company is authorised and regulated by the Cyprus Securities and Exchange Commission (hereinafter the “CySEC”) under the license No. 263/14.

The Company has implemented this policy in compliance with regulatory requirements and ensures that all complaints are investigated and resolved in a manner that is transparent, fair, and in accordance with applicable laws and internal guidelines. This policy is publicly available on the Company’s official website and is periodically updated to reflect any regulatory changes or improvements in the complaints management process.

2. Definitions

For the purposes of this Policy, the following definitions shall apply:

- “Complainant” refers to any natural or legal person who is eligible to submit a complaint to the Company and/or has already submitted a complaint.
- “Complaint” means a statement of dissatisfaction addressed to the Company by a Complainant in relation to the provision of investment services and/or ancillary services by the Company.

3. Complaint or grievance handling

The objective of this Policy is to establish the procedures and actions to be undertaken by the Company in the event of a complaint lodged by a client, in accordance with Article 26 of Delegated Regulation (EU) 2017/565, which supplements Directive 2014/65/EU (MiFID II) regarding organisational requirements and operating conditions for investment firms.

The Company shall establish, implement, and maintain effective and transparent procedures for the prompt and fair handling of complaints or grievances received from retail clients or potential retail clients. The Company shall also maintain a record of each complaint or grievance received, as well as the actions taken to resolve such complaint.

In particular, the Company shall:

- Implement a complaints management policy, as defined and approved by the Company’s Senior Management and the Board of Directors;
- Designate the Compliance Officer as the person responsible for implementing and monitoring adherence to the complaints management policy;
- Ensure the existence of a dedicated complaints management function that allows for the impartial investigation of complaints and the identification and mitigation of any potential conflicts of interest.

4. Types of Complaint Handling

The Company shall investigate any written expression of dissatisfaction submitted by a Client that pertains to the investment and/or ancillary services offered by the Company. Complaints may be related, but are not limited, to the following categories:

Perceived unfair treatment or maladministration on the part of the Company, including but not limited to issues relating to:

- (a) The Client’s Account with the Company, and/or any Transactions and/or Contracts executed or recorded therein;
- (b) The Client’s rights under the Client Agreement and any of the Company’s official policies, including but not limited to:
 - Client Classification Policy
 - Anti-Money Laundering Policy
 - Investor Compensation Fund Policy

- Risk Disclosure
- Privacy Policy
- Costs and Charges Policy
- Conflicts of Interest Policy
- Any additional policies published under the Company's official website www.In2Markets.com

(c) Denial or refusal to provide information regarding the Client's Account, Transactions, or Contracts carried out and/or reflected therein.

(d) Dissatisfaction with the Company's responses to any inquiries submitted by the Client, including any delays in responding within a reasonable timeframe.

5. Ongoing Complaints Analysis

The Company undertakes regular and systematic analysis of complaints data in order to identify and address any recurring or systemic issues, as well as to mitigate potential legal and operational risks. In this context, the Company shall:

- Analyse the root causes of individual complaints to determine whether common underlying issues exist across multiple complaint types;
- Assess whether such root causes may also impact other business functions, processes, or financial instruments not directly related to the original complaint;
- Implement corrective actions, where reasonably practicable, to address and prevent the recurrence of such root causes.

This ongoing analysis supports the Company's commitment to continuous improvement and effective client protection.

6. Submission Requirements

Clients may submit complaints using any of the following methods:

- By post (in hard copy format) to the Company's registered business address: Demokratias 12, Shop 2, 8028, Paphos, Cyprus;
- By email, to the designated address: complaints@in2markets.com

When submitting a complaint, the Complainant is encouraged to include at least the following information:

- Full name and account username;
- If applicable, the identification number(s) of the affected transaction(s) or position(s);
- The date and time the issue occurred;
- A clear and accurate description of the issue.

Supporting documentation may be uploaded or submitted as deemed relevant. The Company may request additional information or clarifications depending on the nature and complexity of the complaint.

All complaints and/or disputes arising between the Client and the Company shall be governed by this Policy and the applicable laws of the Republic of Cyprus.

7. Timeframes

7.1 Reporting of Discrepancies

Clients are encouraged to report any discrepancies identified in account statements or reports as soon as possible, and preferably within a reasonable period following the occurrence. While the Company recommends submitting such notices within 24 hours, this timeframe shall not prejudice the Client's right to raise a complaint at a later stage.

Any errors, whether resulting in a profit or a loss, shall be corrected and the Client's account will be adjusted accordingly, to reflect the position it would have held had the error not occurred.

7.2 Other Complaints

The Company recommends that Clients submit any other complaints within five (5) Business Days from the date on

which the issue occurred. While this timeframe is recommended to ensure timely investigation and resolution, the Company shall not reject a complaint solely on the basis of a delayed submission.

7.3 Complaints to the Financial Ombudsman

Clients are advised that, in accordance with applicable legislation, any complaint submitted more than fifteen (15) months from the date on which the Client became aware, or ought reasonably to have become aware, of the event giving rise to the complaint may not be eligible for review by the Financial Ombudsman of the Republic of Cyprus.

8. Procedure to be Followed When a Formal Complaint or Grievance is Received

8.1 Submission of a Complaint

Clients wishing to submit a formal complaint must complete the Complaint Submission Form (Appendix 1). The completed form, accompanied by a copy of the complainant's identification document and any relevant supporting documentation, may be submitted via the channels outlined in Section 6.

8.2 Initial Handling and Acknowledgement

All complaints shall initially be received and reviewed by the Compliance Department and, where necessary, forwarded without delay to the Head of the relevant department.

The Company shall acknowledge receipt of the complaint within five (5) Business Days, either through automated email confirmation or by formal acknowledgement letter.

The acknowledgement shall include:

- Confirmation that the complaint is under investigation;
- The unique complaint reference number for all future correspondence;
- Contact details of the person or department handling the complaint;

- A copy of this Complaints Handling Policy, free of charge.

8.3 Complaint Registration

Upon receipt of a complaint, the following details shall be recorded and maintained in the Company's complaints register:

- Unique Complaint Reference Number;
- Complainant's full name, address, and account number (if applicable);
- Date the complaint was received;
- Department(s) involved in the investigation, and names of responsible employees;
- Description of the nature of the complaint;
- Status and resolution of the complaint;
- The capital and value of financial instruments held by the client (if relevant);
- The magnitude of any damage or loss claimed;
- References to all related correspondence between the client and the Company.

8.4 Investigation and Assessment

The facts and circumstances leading to the complaint shall be examined in detail based on the information provided by the complainant. If necessary, further evidence shall be retrieved from internal records, including emails, recorded telephone calls, trading data, or IT logs.

Relevant departments (such as Trading, Back Office, IT, or Risk) shall collaborate with the Compliance Department to ensure a thorough review. All efforts will be made to assess the complaint objectively and identify any operational, procedural, or technical deficiencies.

Staff members involved in the investigation shall not:

- Make any binding commitments to the Client;
- Comment on legal matters or issues of best execution;
- Pre-empt the outcome of the formal review process.

8.5 Escalation and Management Review

- All non-trivial complaints shall be brought to the attention of the Senior Management;
- Upon completion of the investigation, a formal report shall be drafted, summarising the facts and proposed resolution;
- Senior Management shall review the report and decide on the final response and any necessary remedial action.

8.6 Communication with the Complainant and Indicative Timeframes

Upon conclusion of the investigation, the Client shall be notified in writing, in a clear and comprehensible manner, of the outcome and any actions taken to resolve the complaint.

The Company shall aim to provide a final resolution within two (2) months from the date of receipt. If resolution cannot be provided within this period, the Client shall be informed within ten (10) to fifteen (15) Business Days from the receipt of the complaint regarding:

- The reason(s) for delay;
- The current status of the investigation;
- The expected timeframe for completion.

The Company shall continue to provide status updates until the complaint is fully resolved.

8.7 Closure of Complaint

The complaint shall be considered closed and the investigation terminated if the complainant fails to respond or provide the required additional information within three (3) months from the original date of complaint submission.

9. Final Decision

The Company shall make every reasonable effort to provide the Final Decision on a complaint or grievance within two (2) months from the date the complaint was

initially received. In any case, the Final Decision shall be provided within the timeframe prescribed by applicable legislation and regulatory requirements.

In the event that the complaint and/or grievance is deemed valid, the Company's Senior Management, in cooperation with the Head of the relevant Department(s), shall:

- Identify and analyse the root causes of the failure or procedural lapse;
- Assess any deficiencies in the internal control mechanisms;
- Propose and implement improvements to the internal controls aimed at preventing the recurrence of similar complaints or grievances in the future.

All proposed corrective measures shall be submitted for review and approval by the Senior Management at the meeting following the completion of the investigation process.

A summary of the above procedure, along with the outcome of the investigation and the resolution measures taken, shall be disclosed to the complainant. This summary may also be reflected in the Client Agreement governing the provision of investment services, where applicable.

10. Further Adjournment

In exceptional cases, where the Company is unable to complete the investigation and issue a Final Decision within the timeframe stipulated under Section 9, a Further Adjournment Notice shall be issued to the complainant.

The purpose of the Further Adjournment is to:

- Inform the complainant of the reasons for the delay in issuing a Final Decision;
- Provide an update on the status of the investigation;

- Indicate the anticipated timeframe for the completion of the investigation and the issuance of the Final Decision.

In such cases, and in line with the Company's commitment to fair and transparent complaint resolution, the complainant may be offered the opportunity to discuss the matter directly with the Managing Director of the Company. This step is intended to provide additional assurance that the complaint is receiving the highest level of attention and that all possible efforts are being made to resolve it appropriately and efficiently.

11. Further Recourse and External Escalation

If the Complainant is not satisfied with the Final Decision issued by the Company, they may refer the complaint to the Financial Ombudsman of the Republic of Cyprus for independent review and possible mediation, including potential compensation.

In accordance with the applicable legislation, it is important to note that the complaint must be submitted to the Financial Ombudsman within four (4) months from the date the Complainant receives the Company's Final Decision. Failure to do so may result in the Ombudsman refusing to examine the complaint due to lapse of the permissible timeframe.

A. Contact Details of the Financial Ombudsman of the Republic of Cyprus:

Address: 13 Lord Byron Avenue, 1096 Nicosia, Cyprus

or Postal Address: P.O. Box 25735, 1311 Nicosia, Cyprus

Fax: +357 22 660 584 or +357 22 660 118

Email: complaints@financialombudsman.gov.cy

Website: www.financialombudsman.gov.cy

In cases where the Company has not issued a Final Decision within three (3) months of receiving the complaint, the Complainant may still contact the Financial Ombudsman, provided that the complaint is referred no later than four (4) months from the date on which the Company was expected to provide the Final Decision.

Furthermore, the Complainant may submit their complaint to the Cyprus Securities and Exchange Commission (CySEC). However, it should be noted that CySEC does not have the authority to award compensation or resolve individual complaints.

B. Contact Details of the Cyprus Securities and Exchange Commission:

Online Complaint Submission:
<https://www.cysec.gov.cy/en-GB/complaints/how-to-complain/>

Please be advised that the above complaint handling mechanisms do not affect the Complainant's legal rights to pursue any claim through judicial proceedings or other available legal remedies under the laws of the Republic of Cyprus.

12. Record-Keeping of Complaints and/or Grievances

Upon conclusion of the investigation, the Client shall be notified in writing, in a clear and comprehensible manner, of the outcome and any actions taken to resolve the complaint.

The Company shall aim to provide a final resolution within two (2) months from the date of receipt. If resolution cannot be provided within this period, the Client shall be informed within ten (10) to fifteen (15) Business Days from the receipt of the complaint regarding:

- The reason(s) for delay;
- The current status of the investigation;

- The expected timeframe for completion.
- The Company shall continue to provide status updates until the complaint is fully resolved.

13. Accountability to CySEC

The Company is obliged to provide CySEC with periodic reports concerning complaints received and the manner in which they have been handled. Specifically, the Company shall complete and electronically submit Form T144-002-01 to CySEC on a monthly basis, no later than five (5) calendar days after the end of each reporting month. The Compliance Officer, in collaboration with the Back Office and other relevant departments, shall ensure the accurate and timely submission of this report.

14. Policy Updates

This Complaints Handling Policy shall be subject to periodic review, at least annually, to ensure its ongoing adequacy and effectiveness. Updates shall be made:

- In response to changes in regulatory requirements;
- Upon identification of material operational changes within the Company;
- Following the detection of deficiencies or inefficiencies in the complaint handling process.

Any revised version of this Policy shall be approved by the Company's Senior Management and, where applicable, the Board of Directors.

Appendix 1 – Complaint Submission Form

To be completed by the Complainant

This form is to be used when submitting a formal complaint to IN2MARKETS LTD (hereinafter the “Company”). You are requested to provide accurate and complete information to enable the Company to properly investigate and evaluate your complaint.

Please note that this form is indicative and not exhaustive. The Company reserves the right to request additional details, clarifications, or supporting documents.

1. Date and Complaint Reference

Date of Submission: Complaint Reference No.:

2. Client Information

First Name:

Surname:

ID / Passport Number:

Country of Nationality:

Trading Account Number:

3. Contact Details

Postal Address:

City / Province:

Postal Code:

Country:

Telephone Number:

Email Address:

4. Complaint Details

Date of Incident / Complaint Creation:

Employee Involved (if applicable):

Description of the Complaint:

(Please provide a detailed description. You may attach a separate sheet if necessary)

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5. Declaration

I hereby declare that the information provided above is, to the best of my knowledge and belief, true, accurate, complete, and not misleading. I understand that the Company may request additional information for the purpose of evaluating this complaint.

Client's Signature: _____

Date: _____

FOR OFFICIAL USE ONLY

Complaint Reference No.:

Date Received:

Received By:

Assigned To:To Be Replied By:

IN2MARKETS LTD

Incorporated in the Republic of Cyprus (Registration no. HE 333743)

Authorised and regulated by the Cyprus Securities and Exchange Commission

Licence no. 263/14

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