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

Revision	Reviewed By	Approved By
Rev 1. 01.06.2026	**Compliance Officer**	**Key Individual**

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

1. Introduction

1.1. Orinoco Capital (Pty) Ltd (hereinafter referred to as 'Orinoco', 'FSP', the 'Company') is a Private Company duly incorporated in accordance with the laws of the Republic of South Africa, bearing registration number 2021/704761/07. The Company is authorised by the Financial Sector Conduct Authority ('FSCA') to operate as a Financial Services Provider ('FSP') with FSP number 51913 under the Financial Advisory and Intermediary Services Act No. 37 of 2002 ('FAIS Act').

1.2. 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 the Clients' Complaints in accordance with the Financial Advisory and Intermediary Services Act ('FAIS Act').

1.3. The FSP continuously seeks new ways to improve the client service experience through innovative ideas and personal attention. Client complaints will be handled as fairly, effectively, and promptly as possible. Feedback from the 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.

1.4. 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.

1.5. 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 Procedure.

1.6. 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.

2. Complaints management mission

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

2.1.1. enabling easy access to the dispute resolution policies and procedures to the Clients

2.1.2. taking all necessary steps to investigate the Complaint after receipt and recording thereof, giving the Complaint due consideration

2.1.3. addressing and resolving any Complaints received in a timely and fair manner

2.1.4. being transparent in the resolution process

2.1.5. ensuring that responsibilities and mandates are delegated to manage disputes and facilitate an escalation process to staff with adequate expertise to improve services and dispute resolution systems and procedures where necessary

2.1.6. 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

2.1.7. maintaining appropriate records of all Complaints for a period of 5 years.

3. Complaints

3.1. Complaints must be relevant

3.1.1. 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:

3.1.1.1. 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

3.1.1.2. 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

3.1.1.3. has treated the Complainant unfairly.

3.1.2. 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 15 days.

3.2. Complaints must be in writing

3.2.1. In order for a Complaint to receive the attention that it deserves, we request that the Complaint should be submitted to us in writing, no later than 3 days after the incident, and must contain accurate and clear information regarding the incident about which the Client wishes to complain.

4. Procedure

4.1. 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.

4.2. The Complaint and all communications in connection with it must be in writing. All verbal communications made in connection with the Complaint must be confirmed in writing within 3 days of the communication.

4.3. The Complaint must contain:

4.3.1. first and last name of the Client (or the company name, if the Client is a legal entity)

4.3.2. the Client's account details in the Trading Platform (the Account number)

4.3.3. details of when the incident first arose (date and time according to the Trading Platform)

4.3.4. ticket number of the previous Complaint in question (if applicable)

4.3.5. description of the situation supported by the reference to the Agreement (where applicable)

4.3.6. copies of all relevant documents attached.

4.4. The Complaint must not contain:

4.4.1. emotional statements regarding the dispute

4.4.2. offensive language

4.4.3. uncontrolled vocabulary

4.4.4. information that is not relevant.

4.5. Upon receipt of the Complaint, the Company will do the following:

4.5.1. the Complaint will be sent to Senior Management of the Complaints Department who will then assign a skilled person to deal with the Complaint

4.5.2. the Client will receive a confirmation of their Complaint, the reference number, and the person dealing with their Complaint within 3 business days from the day the FSP has received their Complaint in writing

4.5.3. the Complaint will be investigated and the Client will receive communication about our preliminary findings within 15 business days from the receipt of the Complaint in writing

4.5.4. preliminary findings will be discussed with internal management and a final finding will be communicated with the Client within 30 business days from the receipt of the Complaint in writing.

4.6. If we are unable to furnish a response until after 30 business days from the receipt of the Complaint, the Client will be assigned under Exempted Complaints and the reason for the delay and the subsequent procedure will be communicated to them.

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

5. Complaints procedure unsuccessful

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

5.2. 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.

5.3. In instances where we have not been able to arrive at a resolution within 6 weeks after the Client has submitted their 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 have arisen after 15 November 2002.

5.4. If the Client wishes to refer a matter to the Ombud, they must do so within 6 months from the date of the notice in which we inform them that we are unable to resolve the Complaint to the Client's satisfaction. The Ombud will not adjudicate matters exceeding a value of R3,500,000.

5.5. 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
Telephone number	012 762 5000
Sharecall	086 066 3247
Email	info@faisombud.co.za
Website	www.faisombud.co.za

6. Rights and duties of the Company

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

6.1.1. the Company has a right to be informed of the Complaint submitted to the Ombud to enable the Company to respond thereto fully

6.1.2. the Company may submit any information or documentation that is relevant to the Complaint

6.1.3. 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

6.1.4. the Company has a duty to act professionally and reasonably

6.1.5. the Company must cooperate with a view to ensuring efficient resolution of the Complaint.

7. Adoption

As Key Individual of Orinoco Capital (Pty) Ltd, I, Christiaan Lourens Botha, hereby confirm the adoption of this Complaints Handling Procedure.

Date: 1 June 2026

8. Complaint Form

8.1. The Client should fill in the Complaint Form and submit it electronically to complaints@finorinoco.com.

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

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

8.4. If the Complaint relates to trading (i.e. execution of orders, trading platforms, etc.) or payments (i.e. deposits, withdrawals), the Client should 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.

8.5. 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	
2. Complaint details	
Date(s) of incident(s)	
Description of the facts and reasons for 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	