

Complaints Handling Procedure

InstaFinance LTD

Owner:	InstaFinance Ltd.
Version/ Date:	v.1 of 21.08.2025

Table of Contents

Introduction	3
.....	
Definitions	3
.....	
General Principles of Complaints Handling	4
.....	
Complaints submission	4
.....	
Complaints handling	5
.....	
Final response	6
.....	
Relevant authorities	6
.....	
Suggestions	6
.....	
Records keeping	7
.....	
Reporting obligations	7
.....	
Updates	7
.....	
Appendix I	8
.....	

Introduction

InstaFinance LTD (hereinafter “the company”) is a BVI investment company incorporated pursuant to the BVI Business Companies Act 2004 on the 12th of February 2014 with registration number 1811672 and License number SIBA/L/14/1082 issued by the BVI FSC

The Company, committed to delivering high-quality services and to serving the best interests of its clients (“Clients”), has adopted the present Complaints Handling Procedure to ensure that any complaints arising from its service offering are addressed in a fair, transparent, and timely manner.

The Company operates the following website: www.instaforex.com, and can be contacted by the following channels:

Address: 4th Floor, Water's Edge Building, Meridian Plaza, Road Town, Tortola, British Virgin Islands.

Email: complain@instaforex.com

I. Definitions

For the purposes of this document, the following terms shall have the meanings set out below:

< **Complaint** > shall mean a written expression of dissatisfaction, submitted to the Company, relating to the services it provides;

< **Compliant** > shall mean a client of the Company who has submitted a Complaint;

< **Person** > shall mean either a natural person or a legal entity, unless the context indicates otherwise;

< **Business Day** > shall mean any day, other than weekends and public holidays in BVI;

< **Acknowledgement** > the written confirmation by the Company that a Complaint has been received;

< **Internal Review** > shall mean any escalation of the Complaint within the Company's relevant departments for further examination and assessment;

< **Resolution** > the Company's final written response to the Complaint, outlining findings and actions taken.

< **Receipt Date** > the date on which the Complaint is received by the Company, used to calculate deadlines;

< **Personal Data** > shall mean any information relating to an identified or identifiable natural person (“Data Subject”), meaning one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person;

< **Confidential Information** > any non-public information obtained during the complaints process, subject to confidentiality obligations.

II. General Principles of Complaints Handling

The Company is committed to maintaining the highest standards of business integrity, professionalism, and regulatory compliance in all aspects of its operations, including in relation to its approach in handling complaints. Therefore, the Company adopts the following guiding principles:

1. Client's best interest.

Complaints are handled with due care, respect, and sensitivity, with the primary objective of safeguarding the best interests of our clients.

2. Fairness and Impartiality.

All complaints are assessed and resolved in a fair and objective manner, without bias or prejudice towards any party involved. Decisions are based on facts, applicable agreements, and regulatory obligations.

3. Transparency.

The complaints process, including timelines and escalation procedures, is clearly communicated to Clients in a fair, clear and not misleading way. Clients are kept informed of the progress and outcome of their complaints in a timely manner.

4. Efficiency.

Complaints are acknowledged promptly and investigated without undue delay. The Company strives to resolve all complaints within reasonable and regulatory timeframes.

5. Continuous Improvement.

The Company monitors, records, and analyzes complaints to identify recurring issues and, where necessary, upgrade its internal processes, conduct staff training, and improve its risk management as a preventative measure and aligning with business best practices.

III. Complaints submission

1. In the event that a Client has a Complaint related to the dealings or services with the Company, then the Client may submit the Complaint using the below methods:

a) The Client shall download the Complaint Form provided in Appendix I, complete it in full, and submit it via email to complain@instaforex.com, along with any supporting documents or evidence the Client considers relevant;

b) Details required by the form or in the email include but are not limited to:

- full name;

- birth date;
- ID/passport number;
- account number;
- contact information;
- category of the complaint (deposit, withdrawal, order execution, other);
- amount (if any);
- short description mentioning the nature of the complaint including vital information (for instance: if the complaint relates to an order or withdrawal request, please include the transaction ID).

2. Important clarifications

- a) Anonymous Complaints shall not be accepted or processed;
- b) Submitting a Complaint by email without the required form attached, or sending it to an address other than complain@instaforex.com will result in a response requesting that you complete the form and/or resubmit it to the correct email address;
- c) If you submit an incomplete Complaint Form, the Company will request a duly completed version, provided within two (2) weeks in order for the Complaint to be registered;
- d) Phone Complaints will only be accepted if the Client expressly authorizes the Company's personnel to complete the Complaint Form on their behalf;

3. Confirmation of Receipt

Upon official receipt of a duly completed Client Complaint, the Company will send a written acknowledgment by email within five (5) business days. The acknowledgment will confirm that the Complaint has been received and is under review, and will include a Unique Reference Number to be used in all future communications with the Company or any relevant third party.

IV. Complaints handling

1. Complaints are received by the Company's Customer Support Department and assigned to a designated officer for investigation. The officer shall inform the heads of all relevant departments and coordinate the necessary actions to investigate the circumstances of the Client's Complaint and ensure its resolution without undue delay.
2. The investigation shall be concluded within two (2) months from the date of acknowledgment of the Complaint, and the results shall be communicated to the Client. The outcome may consist of either a resolution of the Complaint or a determination that further investigation is required.

3. If additional time is necessary, the Company will notify the Complainant in writing via email, specifying the reasons for the delay. In all cases, the Company shall provide a final response within no more than three (3) months from the date of acknowledgment of the Complaint.

V. Final response

1. Upon conclusion of the investigation, the Company shall provide the Client with a final response, which will include the Company's decision, relevant details of the investigation, and
2. In the event that the Client is dissatisfied with the Company's final response, the Client may escalate the Complaint to the BVI Financial Services Commission (BVI FSC). Be kindly advised that, although BVI FSC does not adjudicate individual disputes or award compensation, it can investigate the case to check whether the company has violated regulatory standards and may enforce compliance.
3. Notwithstanding the above provisions, the Client's right to initiate legal proceedings against the Company in relation to the Complaint remains unaffected.

VI. Relevant authorities

1. BVI Financial Services Commission (BVI FSC)

Website: <https://www.bvifsc.vg>

Email: commissioner@bvifsc.vg

Address: 18 Pasea Estate Road, Haycraft Building, Road Town, Tortola, VG1110, BVI

Telephone: (284) 8524123

2. Financial Services Complaints Tribunal

Website: <https://bvi.gov.vg/media-centre/financial-services-complaints-tribunal>

Email: tribunal@bvifsc.vg

Address: Pasea Estate, Tortola, VG1110, BVI

Telephone: (284) 494-4190

VII. Suggestions

The Company greatly values the opinions and feedback of its Clients. While we strive to provide the most tailored services, it is essential for us to understand our Clients' actual experience in order to identify and improve any areas that may require enhancement.

Any suggestions Clients wish to share with the Company may be submitted using the same form provided in Appendix I of this document.

VIII. Records keeping

Upon receipt of the Complaint Form, the Company shall record it in its internal register in an appropriate manner. For ease of reference and retrieval, the Company shall maintain the following information in its records for a minimum period of five (5) years:

- Complaint Unique Reference Number;
- Client account ID;
- date of Complaint official submission to the Company;
- assigned officer;
- Complaint details;
- Complaint investigation process;
- escalation / assignment to a different department;
- date of escalation / assignment;
- assigned officer;
- investigation process;
- investigation results;
- date of response;
- investigation results and actions;
- date of response.

IX. Reporting obligations

The Company reports to BVI FSC at the end of each month of all Complaints received during the reporting month. Additionally, the Company reports on the status of Complaints whether it has been resolved or not and if necessary, on the actions taken by the Company.

X. Updates

The Company will perform a periodical review of this Policy, at least once a year and whenever material changes to the Company's operations take place. The updated version of this Complaints Handling Procedure will be always available on the Company's website.

APPENDIX I

InstaFinance Ltd.

SUGGESTIONS AND COMPLAINTS FORM

Full Name: _____

ID / Passport No.: _____

Account No. (UIN): _____

Mobile Phone: _____

Email: _____

Address: _____

Post Code: _____

City: _____

Country: _____

Please select related area from the below:Deposit ☐Withdrawal ☐Order Execution ☐Investment advice ☐Portfolio Management ☐Terms of Contract/fees/charges ☐General admin/customer services ☐Quality of lack of information provided ☐Unauthorized business being offered or carried out ☐Other ☐**Disputed Amount (in EUR):** _____

Please provide a short description of the Complaint / Suggestion:

Is there any other information essential to your Complaint / Suggestion? (Example: if a complaint is about a trade order or withdrawal request include the relevant transaction ID.)

Any Attachments / Evidence?

YES ☐NO ☐

Date: _____

Signature: _____