

INFINOX

TRADING POWER

Complaints Handling Policy

INFINOX Capital Limited

February 2026

Contents

1. Introduction.....	2
2. Responsibility.....	2
3. Definition of Complaint.....	2
4. How can Clients Complain?.....	2
5. Complaints Handling.....	2
6. Financial Ombudsman Service (FOS).....	3
7. Eligible Complainants.....	3

1. Introduction

This Complaints handling policy documents the process of how we deal with client complaints made to INFINOX Capital Ltd, (also referred to as “INFINOX”, the “firm”, “us”, “we” and “our”). As an FCA authorised and regulated firm, we endeavour to offer our customers the highest standard of service in all aspects of our business.

We appreciate that from time to time, things may go wrong or there may be misunderstandings, or clients may be dissatisfied with some aspect of our service. We are committed to dealing with queries and complaints promptly and sympathetically, in the best possible way and to achieve a fair outcome for our clients. Where we are at fault, we aim to put things right at the earliest opportunity.

Complaints are where clients have expressed dissatisfaction about INFINOX’s provision, or failure to provide a financial service, or where a client’s initial query was not resolved satisfactorily, and the client remains dissatisfied.

2. Responsibility

The Head of Compliance is responsible for overseeing Complaints and is considered the Complaints Manager for INFINOX. The Complaints Manager has access to all necessary resources and personnel to carry out this role properly.

INFINOX acknowledges the importance of having an effective and efficient complaints handling framework. INFINOX adopts a customer-focused approach, is open to feedback, and demonstrates its commitment in its actions and the resources it makes available to dispute resolution.

This procedure is reviewed annually by the Complaints Manager.

3. Definition of Complaint

A complaint is defined by the FCA DISP rules as any oral or written expression of dissatisfaction (made in any medium for example in person, by letter or email), whether justified or not, from or on behalf of a customer the provision of or failure to provide, a financial service or a redress determination, which:

- a) alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience; and
- b) relates to an activity of that respondent, or of any other respondent with whom that respondent has some connection in marketing or providing financial services or products, which comes under the jurisdiction of the Financial Ombudsman Service.

INFINOX resolves complaints in accordance with the FCA DISP Rules (Complaints Handling Rules).

4. How can Clients Complain?

If for any reason a client is dissatisfied with the provision of any of our financial services, or their trading account, or a particular trade or number of trades, or where their initial query was not resolved to their satisfaction, or anything else, they can raise a complaint through any supported communication channel to our Client Support Team. The most common means of contact are via email primesupport@infinox.co.uk.

However, for a trade query about a particular trade or number of trades, clients are encouraged to contact our INFINOX Client Support Team through Slack chats as soon as possible with details of the trade query. The Client Support Team will determine whether the query can be resolved quickly or if it will require further investigation. Most client queries can be resolved immediately or within 24 hours. If the query requires further investigation and cannot be resolved within 24 hours, we will be in regular contact with the client until the query has been resolved as soon as practicably possible.

5. Complaints Handling

Our Client Support Team determines whether the complaint can be resolved quickly or if it will require further investigation. If the complaint cannot be resolved by the close of the third business day following receipt and

requires further investigation, the complaint is escalated to the Compliance Department to carry out the further investigations.

In all instances, the Client Support Team sends an initial response to the client within 24 hours acknowledging receipt of the complaint; carries out a thorough investigation and aims to resolve the complaint as soon as reasonably practicable within 3 business days. Through their handling of the complaint, the Client Support Team will determine one of the following:

- The complaint can be resolved within a 3 business days period and a final response will be issued to the client by the Client Support Team informing them how their complaint has been resolved, along with a 'Summary Resolution Communication,' which informs them that should they subsequently decide that they are still dissatisfied with the resolution of the complaint. If they are an eligible complainant, then they may be able to refer the complaint to the Financial Ombudsman Service within six months of the date of our final response. A copy of all the complaint correspondence will then be forwarded to the Compliance Department.
- The Complaint cannot be resolved within a 3 business days period and the complaint will be escalated to the Compliance Department to investigate further. Where the Complaint has been escalated to the Compliance Department to handle, the Compliance department will then contact the client as soon as reasonably practicable informing them that the complaint has been escalated to Compliance and will be dealt with by them accordingly.

Where Compliance has taken charge of investigating a complaint, the investigation will be carried out thoroughly, taking into account any information contained within the trading account(s) and records of the Firm, in order to reach a fair outcome for the client. The Compliance Department will have not been directly involved with the subject of the complaint and is therefore able to carry out an independent and impartial investigation. When investigating complaints, Compliance will take into account the subject matter of the complaint, the evidence that has been provided by the client, the evidence on our records and relevant guidance from our regulator, the Financial Conduct Authority (FCA).

The Compliance department will endeavour to provide a final response to the client within 8 weeks of receiving the complaint. During the 8-week period, Compliance will update the client on the status of the complaint until such a time that the investigation is complete and a final response can be issued.

Compliance's final response will set out in a fair, clear and not misleading manner the assessment of the complaint, the decision or outcome of the complaint and supporting reasons, and any potential offer of remedial action or redress. Where the remedial action involved a redress, Compliance will include details of how the redress has been calculated.

If we are unable to resolve a complaint within eight weeks of receiving it, we will contact the client in writing to explain why we are not in a position to issue a final response and provide an indication of when we expect to be able to provide our final response.

6. Financial Ombudsman Service (FOS)

The FOS is a free of charge service that settles complaints between consumers and businesses that provide financial services. It is a statutory dispute resolution scheme set up under the Financial Services and Markets Act 2000. The rules on how the FOS should handle complaints are set by the FCA and can be found in the DISP Handbook.

Following our investigation of a client's complaint, if the client remains dissatisfied or if we have been unable to provide a final response to the client within eight weeks of receiving it, the client may be able to refer their complaint to the FOS. The FOS acts as an impartial adjudicator in the resolution of disputes with financial services firms. It is to be noted that the FOS can only deal with complaints from 'eligible complainants', as explained below.

7. Eligible Complainants

DISP 2.7.3R sets out who is an eligible complainant, as follows:

- (1) A consumer; or
- (2) A micro-enterprise;
 - a. In relation to a complaint relating wholly or partly to payment services, either at the time of the conclusion of the payment service contract or at the time the complainant refers the complaint to the respondent; or

- b. Otherwise, at the time the complainant refers the complaint to the respondent; or
- (3) A charity which has an annual income of less than £6.5 million at the time the complainant refers the complaint to the respondent; or
- (4) A trustee of a trust which has a net asset value of less than £5 million at the time the complainant refers the complaint to the respondent; or
- (5) (in relation to CBTL business) a CBTL consumer; or
- (6) A small business at the time the complainant refers the complaint to the respondent; or
- (7) A guarantor.

A consumer, as noted in (1) above can be any natural person acting for purposes outside his trade, business, or profession.

A small business, as noted in (6) above, is defined as an enterprise which:

- a) is not a micro-enterprise;
- b) has an annual turnover of less than £6.5 million; and
 - i. employs fewer than 50 persons; or
 - ii. has a balance sheet total of less than £5 million

A micro-enterprise, as noted in (2) b. above, is defined as an enterprise which:

- a) employs fewer than 10 persons; and
- b) has a turnover or annual balance sheet that does not exceed €2 million.

It is important to note that although INFINOX only deals with Professional Clients and Eligible Counterparties, we can still have complainants refer their complaints to the FOS as eligible complainants.