



CGPH GROUP COMPLAINT HANDLING POLICY

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Version	2.0
Policy Owner	Group Legal & Compliance
Approved by	Director of CGPH Group Ltd.
Applies to	All CGPH Group Companies
Classification	Internal Group Policy
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Review Cycle	Annual

1. Introduction

CGPH Group Ltd. is committed to delivering professional, transparent and high-quality services to its clients, counterparties and business partners. Maintaining constructive relationships requires not only excellence in service delivery but also the ability to address concerns promptly, fairly and professionally whenever they arise.

The Group recognises that complaints provide valuable opportunities to strengthen client relationships, improve internal procedures and reinforce the effectiveness of its governance framework.

This Policy establishes the principles governing the receipt, assessment, investigation and resolution of complaints relating to the Group's activities.

This Policy shall be read together with the Group Treating Clients Fairly Policy, Code of Ethics, Code of Conduct, Whistleblowing Policy and all other relevant governance documents.

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2. Purpose

The purpose of this Policy is to establish a consistent and transparent framework for handling complaints throughout the Group.

The Policy seeks to promote fair treatment of clients.

Ensure complaints are handled objectively and efficiently.

Encourage timely resolution of concerns.

Support continuous improvement of services.

Protect the reputation of the Group.

Strengthen confidence among clients and stakeholders.

Support compliance with applicable legal and regulatory requirements.

3. Scope

This Policy applies to every company belonging to the CGPH Group and to every director, officer, employee, consultant, contractor, advisor and representative acting on behalf of a Group Company.

The Policy applies to complaints relating to the services, conduct, communications, transactions or professional activities of the Group.

This Policy does not replace any legal rights available to complainants under applicable law.

4. Definition of a Complaint

A complaint is any expression of dissatisfaction made by a client, prospective client, counterparty, investor, supplier, business partner or other stakeholder relating to the activities, services or conduct of the Group.

A complaint may be made verbally or in writing and may concern service quality, delays, communications, fees, contractual performance, professional conduct or any other matter connected with the Group's business activities.

The classification of a communication as a complaint shall not depend upon the terminology used by the individual raising the concern.

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5. Guiding Principles

All complaints shall be treated seriously.

Complaints shall be handled fairly, objectively and without bias.

Every complaint shall receive appropriate consideration regardless of the commercial importance of the client or the value of the underlying transaction.

The Group shall seek to resolve complaints promptly while maintaining professionalism and respect throughout the process.

Individuals handling complaints shall act independently and objectively.

6. Receiving Complaints

Complaints may be submitted through any communication channel normally used by the Group, including email, written correspondence, telephone conversations, meetings or any other appropriate means.

Personnel receiving a complaint shall acknowledge the concern professionally and ensure that the matter is referred promptly through the Group's internal procedures.

Where appropriate, sufficient information shall be obtained to understand the nature of the complaint and the outcome sought by the complainant.

7. Acknowledgement

The Group shall acknowledge receipt of complaints within a reasonable period whenever appropriate.

Acknowledgement of a complaint does not imply acceptance of responsibility.

The complainant shall be informed that the matter will be reviewed in accordance with the Group's Complaint Handling procedures.

Where additional information is required, reasonable efforts shall be made to obtain clarification.

8. Assessment of Complaints

Each complaint shall be assessed objectively according to its nature, seriousness and potential impact.

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The assessment shall determine whether additional investigation is required and identify the appropriate individuals responsible for handling the matter.

Complaints involving legal, regulatory, compliance or reputational issues shall be referred to Group Legal & Compliance without undue delay.

9. Investigation

Where appropriate, complaints shall be investigated fairly, independently and proportionately.

Relevant documentation, communications and available evidence shall be reviewed.

Personnel involved in the matters under review may be asked to provide factual information.

Investigations shall seek to establish the relevant facts before any conclusions are reached.

The Group shall conduct investigations in a manner that respects confidentiality and the rights of all individuals involved.

10. Communication with the Complainant

The Group shall communicate with complainants in a professional, respectful and transparent manner.

Where appropriate, updates may be provided during the review process.

Communications shall avoid unnecessary legal or technical language wherever reasonably practicable.

Responses shall explain the outcome of the review and any actions taken where appropriate.

11. Resolution of Complaints

The Group shall seek to resolve complaints fairly and within a reasonable timeframe.

Where shortcomings are identified, appropriate corrective measures shall be considered.

Resolution may include clarification, explanation, corrective action, internal process improvements or any other appropriate response depending upon the circumstances.

The Group shall not admit liability unless authorised to do so following appropriate internal review.

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12. Escalation

Where a complaint cannot be resolved through the normal review process, the matter may be escalated to senior management or Group Legal & Compliance.

Complaints involving significant legal, regulatory, financial or reputational implications shall receive appropriate management oversight.

Where external legal proceedings or regulatory involvement become likely, the matter shall be managed in coordination with Group Legal & Compliance.

13. Confidentiality

Complaints and related information shall be handled confidentially.

Information shall only be disclosed to individuals who have a legitimate business need to participate in the assessment or resolution of the complaint.

Confidential information obtained during the complaint handling process shall be protected in accordance with the Group's confidentiality and data protection requirements.

14. Record Keeping

The Group shall maintain appropriate records relating to complaints received, investigations conducted, decisions reached and corrective actions implemented.

Records shall be retained securely in accordance with the Group Record Keeping Policy.

Appropriate documentation supports consistency, accountability and continuous improvement.

15. Continuous Improvement

The Group recognises that complaints provide valuable opportunities to improve its services.

Trends, recurring issues and lessons learned from complaints shall be considered when reviewing procedures, internal controls and service delivery standards.

Where appropriate, corrective measures shall be implemented to reduce the likelihood of similar complaints arising in the future.

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16. Training and Awareness

Personnel shall receive appropriate guidance regarding the standards established by this Policy.

Managers shall encourage professional, respectful and solution-oriented approaches to complaint handling.

Training initiatives shall promote effective communication, client service and awareness of applicable legal and regulatory obligations.

17. Responsibilities

Every individual acting on behalf of the Group is responsible for treating complainants professionally and ensuring that complaints are referred through the appropriate internal procedures.

Managers shall oversee complaint handling within their areas of responsibility and ensure that complaints receive appropriate attention.

Group Legal & Compliance shall provide guidance regarding complaints involving legal, regulatory or reputational issues and shall support the consistent implementation of this Policy.

The Board of Directors shall oversee the effectiveness of the Group's complaint handling framework as part of the overall governance structure.

18. Breaches of this Policy

Failure to comply with this Policy may expose the Group to legal, regulatory, operational and reputational risks.

Failure to handle complaints fairly, attempts to conceal complaints or inappropriate treatment of complainants may result in disciplinary action, contractual consequences or other measures considered appropriate by the Group.

Serious misconduct may also result in reporting to competent authorities where required by applicable law.

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19. Review

This Policy shall be reviewed periodically to ensure that it remains consistent with the Group's activities, governance framework and applicable legal and regulatory requirements.

Material amendments shall be approved by the Board of Directors of CGPH Group Ltd.

20. Final Provisions

The fair and professional handling of complaints forms an essential part of CGPH Group's commitment to integrity, transparency and client service.

Every complaint represents an opportunity to strengthen trust, improve internal processes and reinforce the Group's reputation for professionalism and responsible corporate conduct.

By applying the principles contained in this Policy consistently across all Group Companies, CGPH Group seeks to maintain the confidence of its clients, counterparties, investors and all other stakeholders while continuously improving the quality of its services.

Approved by:

Director of CGPH Group Ltd.

Date: July 1, 2026

Signature: _____

Name: Kolyo Boichev

Title: Director

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