

CLIENT COMPLAINT MANAGEMENT PROCESS AND PROCEDURES

1. PURPOSE

Effective management of client complaints is a vital component of treating clients fairly. The purpose of this document is to provide all staff and partners with a consistent and comprehensive understanding of how to handle client complaints successfully in order to improve the services and status of our business and overall Client Experience.

It is important to record all complaints to ensure that we learn from the outcomes when we analyse complaints. The document recommends practical procedures and processes for reviewing and resolving client complaints in a courteous, timely, effective and fair manner, standards of which are aligned to the Complaints Management Discussion Document which forms part of the TCF Regulatory Framework. This document will be reviewed on an annual basis.

Effective management of client complaints is key to supporting our aim in which dissatisfied clients can be transformed into advocates or loyal supporters of our business which ultimately builds trust and lasting relationship sustainability.

In line with the TCF ('treating clients fairly') principle aims, we strive to raise standards in the way we operate, by introducing changes that will benefit our clients and increase their confidence in our brand.

This document serves as a guideline to achieve the following throughout the complaint management process:

- To understand what constitutes a complaint (regulatory definition) so that there is a consistent understanding across the FSP. This is especially important when capturing complaints onto the system
- To set consistent standards and requirements for us to implement internal complaints management processes, including record keeping, monitoring and analysis
- To thoroughly investigate the complaint
- To identify possible service breakdowns
- To ensure fair treatment of clients in line with the TCF principles
- To make informed decisions
- To ensure timely resolution
- To conduct root cause analysis
- To put forward and manage possible solutions through corrective action improvements
- To ensure that our complaints process is fair, transparent, accessible and visible to our clients
- To ensure that adequate communication is provided to the client about how to complain, where to complain and to whom they can complain to and that this is performed in clear and understandable language.

2. PROCESSES – COMPLAINTS HANDLING

Perpetua is responsible to acknowledge the complaint with the client as well as provide them with regular feedback. The maximum time for acknowledgement of a complaint is 3 days. Where the complaint is urgent (i.e. the risk of reputational impact is high), this time frame must be shortened even further. Please refer to the diagram below.

Perpetua deals with complaints as follows:

- a. Log the date and contents of the complaint in the Complaints Register.
- b. Accept all complaints submitted from whatever medium; verbal or written (ask the client to send their complaint in writing if possible). The fact that a complaint is not in writing must not deter the Perpetua in handling the complaint.
- c. Acknowledge receipt of the complaint in writing within 3 days of receipt, and give the client the name(s) and contact details of the staff responsible for the resolution of the complaint.
- d. Investigate the complaint to ascertain whether the complaint can be resolved immediately.
- e. If the complaint can be resolved immediately, take the necessary action and advise the client accordingly.
- f. If the complaint cannot be resolved immediately, send the client a written summary of the steps to be taken to resolve the matter and the expected date of resolution.

- g. If unable to resolve the complaint within 3 weeks of logging the complaint with the Complaints Register, notify the client by means of a written acknowledgement. This will outline the current status of the complaint and the expected date of final resolution.
- h. If unable to resolve the complaint within a further 3 weeks of the written acknowledgement (6 weeks since complaint logged), notify the client giving full written reasons as to why the outcome was not favorable, and advise the client of their right to seek legal redress by referring the complaint to the Office of the Ombudsman.
- i. Notify the complainant that he/she has 6 months of receipt of such notification to refer the matter to the Financial Ombud. The Ombud's name, address and other contact details must be provided.
- j. Update the register with all developments/activities.

Complaints process flow

If complaint is not in writing, ask for a written complaint

Complaint received, validated and logged as a new complaint on Complaint Register

Acknowledge receipt of complaint in writing within 3 days

Complaint assigned and investigated

Resolve the complaint immediately or take the necessary action and advise the client of steps taken and expected date of resolution

Update the Complaints Register with all developments/activities

Inform client in writing of the resolution of the complaint and the outcome

Notify the client if complaint is not resolved within 3 weeks – advise on status of the complaint

See also Disputes- section 7.

Notify the client of final outcome. This must be no later than 6 weeks since the complaint was logged/Advise client of other options