

Group Customer Complaints Management Policy

The purpose of this Policy is to provide the foundation for implementing a consistent, diligent, efficient and impartial approach throughout the Group for the handling of customer complaints, specifically, to introduce common organisational governance, procedures and tools for the support of a customer complaints management system in order to optimize complaints handling.

The complaints handling mechanism is perceived as a valuable opportunity to find out what the Group needs to do to improve, re-build and enhance communication and relationships with its customers as well as to safeguard clients trust and confidence, especially when something goes wrong.

The general principles of this Policy include:

- Complaints handling should be embedded in the Group's governance structure, with Senior Management actively monitoring the process and driving remedial actions and policies to improve procedures, products etc.
- Procedures for handling customer complaints should be clearly documented in local procedures manuals and circulars.
- Pro-active and efficient measures should be designed and implemented to promote the Group's policy that all customer's complaints are welcomed based on the Group's commitment to deliver excellent service every time a customer interacts with the Group.
- The procedure on how to file a complaint and how this will be resolved should be adequately communicated to customers in an easily accessible manner, making reference, among other things, to the means available to customers to file a complaint, the process to be followed when handling a complaint, including the handling timelines and acknowledgements required, alternative dispute resolution process such as their right, the circumstances and the procedure to refer to the Financial Ombudsman (FO) if they are not satisfied with the complaint's resolution (including contact details of FO).
- All complaints should be investigated thoroughly, consistently, fairly, promptly and independently. Management controls should be in place to achieve this.
- All employees should be aware of the relevant procedures and receive appropriate training. Guidance should be provided to support front-line complaint handlers on resolving complaints (e.g. guidance on common simple complaints).
- Local Management should actively oversee the implementation process and ensure that all complaints are properly and efficiently escalated, resolved and recorded and that the customer is properly and timely informed.

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