

# Complaints Policy

## Why is this policy important?

We are committed to providing the highest quality service to our clients. However, from time to time a client may express dissatisfaction with the experience they have received.

A complaint is an expression of dissatisfaction made to us, or to a person engaged by us, in relation to our Financial Advice Service, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected.

A complaint can also arise when the matter relates to a failure to provide a service or give advice.

Our FAP license requires our brokerage to have a fair, timely and transparent process in place for resolving client complaints relating to our Financial Advice Services. Managing client complaints well is fundamental to providing good client outcomes. This policy sets out our approach.

## Our policy

We do this:

- We deal with complaints in a fair, timely and transparent manner.
- We encourage all complaints to be put in writing by letter or email and we retain records that set out the complaint, any actions we take in dealing with it, and the dates of those actions.
- We formally acknowledge receipt of all complaints within [two] business days of receipt and advise the client about our internal complaints process and our Dispute Resolution Scheme.
- We record all complaints in our Complaints Register
- We ensure that responsibility for resolution of the complaint is assigned to the appropriate individual in our brokerage.
- We keep the client informed regarding the progress of their complaint.
- Where no action is taken in respect of a complaint received, we record the reasons for not taking any action.
- If a complaint cannot be resolved, we inform the client about taking the matter to our Dispute Resolution Service.
- We undertake root cause analysis of complaints to identify trends and issues and make changes to our services and procedures where necessary.

- We have clear escalation thresholds for complaints and provide complaints data to our Directors.

We don't do this:

- Treat complaints as trivial or unimportant.
- Keep them to ourselves and not communicate them to the appropriate people internally (or externally).
- Discourage clients from engaging with our Dispute Resolution Body should that be the most appropriate course of action for them.
- Delay or prolong resolution of complaints unnecessarily.
- Not make changes to our services and procedures where complaints identify issues.
- Conduct ourselves in an impersonal or legalistic manner.

### **Implementation**

A complaints form, details of our DRS, and details of who to contact are clearly set out on our website.

All brokers and employees receive induction and annual retraining on the contents of this policy.

A Complaints Register is in place that records all complaints, the dates they were received, and any actions taken in relation to them, along with the dates of those actions.

### **Ensuring compliance**

Training records confirming brokers' attendance at complaints training policy sessions.

Broker and employee attestations to policy adherence.

Monthly review of Complaints Register by the Directors.

Quarterly Root cause analysis of any complaints by the Directors.

### **Version Control**

Version No.	Reviewed by	Approver	Reviewed Date	Key Changes or no changes
1.0	SJS	BP	6 <sup>th</sup> September 2022	No

This policy is reviewed annually.