

Customer Complaint Handling Policy

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1 Introduction

1.1 Purpose of the Policy

This Policy is designed to aid the employees and ADCBI to minimise its risk of regulatory breaches and to ensure that ADCBI's clients are treated fairly and consistently.

This Policy sets out the steps required to identify a potential client complaint for dealing; recording; and resolving that complaint.

Disciplinary action

A breach of the rules contained in the policy may result in disciplinary action being taken by ADCBI against an employee. It is mandatory that all employees must read this policy and also follow any circulars/guidelines issued by the regulators.

Furthermore, a breach may need to be reported to the Regulator and may affect an individual's future employment prospects. Similarly, a significant and culpable involvement in a regulatory failure may result in disciplinary action.

1.2 ADCBI's Complaints Policy

ADCBI policy is that, all customers' complaints should be treated fairly and consistently and dealt with using due skill care and diligence and adheres to Circulars/Guidelines issued by the regulators from time to time.

The aim of dealing with complaints is to resolve the issue raised by the complainant and identify and resolve system and control weaknesses. Suitable records will be maintained to allow management to adequately monitor the level and types of Complaints that it is receiving. Complaints received during the month will be put up put up to the Management Committee on monthly basis.

2 Process Risks

- Failure to record complaints A register will be maintained to include a record of the number of complaints received.
- Complaints are not dealt with fairly Review of written correspondence with clients will be undertaken.

- Complaints Definition provided and employees trained.
received from a client or eligible complainant not identified as such.

3 Identifying Complaints

A complaint is defined as

- 1) “any expression of dissatisfaction, whether oral or written, and whether justified or not, about ADCBI’s provision of, or failure to provide, a financial service”; and
- 2) “must involve an allegation that the complainant has suffered, or may suffer, financial loss, material inconvenience or material distress”.

Accordingly, ADCBI may treat a complaint that does not meet the second criteria as a “minor complaint”.

Minor complaints such as minor mechanical, administrative or clerical errors must be dealt with immediately by the employee concerned, either in writing or by telephone. No record of minor complaints needs to be kept.

If a problem persists or the complaint cannot be dealt with in a reasonable time (five working days), it should not be treated as minor and should be processed as detailed below.

4 Complaints handling procedure

4.1 All complaints will be centrally monitored.

4.2 A register will be maintained in both the branches to include a record of the number of complaints received.

4.3 All correspondence received should be reviewed on the day on receipt and complaints should be identified.

4.4 The complaint should be:

- investigated competently, diligently and impartially;
- assessed fairly, consistently and promptly considering:
 - (a) the subject matter of the complaint;
 - (b) whether the complaint should be upheld;
 - (c) what remedial action or redress (or both) may be appropriate; and

- (d) if appropriate, whether it has reasonable grounds to be satisfied that another respondent may be solely or jointly responsible for the matter alleged in the complaint; taking into account all relevant factors;
- 4.5** If the correspondence is not a complaint it should be treated as an enquiry and responded to in a reasonable timeframe with due skill care and diligence appropriate to the enquiry.
- 4.6** If the correspondence is a complaint it should be then forwarded to respective department heads to take further action.
- 4.7** If the correspondence relates to a previous complaint it should be reviewed in light of that correspondence and the previous records referred to.
- 4.8** If the complaint can be resolved by the close of day of receipt then it can be treated as a minor complaint as noted above provided a substantive response has been sent to the client.
- 4.9** A substantive response should be sent to the client within 7 business days of receipt, or in its absence a holding letter sent. The letters should explain to the complainant promptly and, in a way that is fair, clear and not misleading, its assessment of the complaint, its decision on it, and any offer of remedial action or redress. A copy of the correspondence must be maintained and the complaints register updated.
- 4.10** In event of any complaint which cannot be resolved amicably within 7 business days, the relevant Complaint Register is updated and the client be sent a final response or a response which explains the reasons of why it is not in a position to make a final response indicating when it is able to resolve informing the complainant.
- 4.11** All complaints register will be reviewed periodically by Customer service committee
- 4.12** The date on which the complaint was resolved must be recorded.

5 Records Retention period

When a complaint has been settled, the complaint record and associated correspondence must retain the records for at least five years from the date the complaint was received. The date on which the complaint was resolved must be recorded.