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# Complaints Handling Policy.

## 1. Objective

Valitor group (Valitor) is required in line with applicable regulations to have in place an effective and transparent process for the reasonable and prompt handling of complaints, and to recognise that complaints require resolution.

This Complaints Handling Policy (“the Policy”) outlines the way in which we handle complaints made against Valitor, its products, processes or staff.

## 2. Scope and application

This Policy applies to all employees, all functions, all units, and all legal entities within Valitor group. The aim of Valitor is to comply with relevant legal requirements, and to give customers facilities and options to submit complaints.

## 3. Definitions

### *Complaint*

For the purposes of this policy, Valitor defines a complaint as follows: An expression of dissatisfaction made to Valitor, related to its products, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected and/or that claims that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience.

### *Complainant*

Any person or organization that is dissatisfied with Valitor’s product or a service it provides, may contact the firm to complain.

### *End customer*

This Policy does not cover complaints made by persons or organizations that are not customers of the firm, including any customer of a customer (“End Customer”).

If Valitor receives a complaint from an End Customer that is not our customer, we will follow normal support function protocol and redirect the End Customer to the relevant service provider against whom the End Customer has an issue; in certain exceptional circumstances, if the End Customer has been severely dissatisfied, Valitor may deal with the issue as a legitimate complaint.

## 4. Measures

### *Complaint Handling Process*

Valitor has undertaken a number of initiatives to assist customers if they want to make a complaint through the Valitor Complaint Handling Process.

The Complaint Handling Process shall include relevant information on how a customer can make a complaint, with easy accessible steps for the customer to follow, and should include facilities to submit a complaint; online, in writing by mail and by phone.

The Complaint handling process should also include information on how a complaint is investigated resolved, and information about referral of complaints to the Financial Ombudsman Service, if applicable.

## **5. Training**

Relevant employees with roles that require detailed knowledge of the complaints handling, shall undergo regular compliance training to ensure awareness of Valitor's complaints handling obligations.

## **6. Complaint register**

Valitor must establish and maintain a Complaint register. The Complaint register is reviewed regularly and assessed for patterns and/or ongoing issues. Where patterns or ongoing issues are identified, actions are taken and recorded to prevent further instances.

## **7. Record retention**

Record Retention of Complaints and records associated with customer complaints are kept for a minimum of five (5) years.

## **8. Reporting**

The Compliance Officer shall report on Valitor's Complaint Handling Process and Complaints register and on the progress of major mitigating activities in accordance to the Valitor's Complaints Handling Process to the Executive Management and the Board of Directors on an annual basis.

## **9. Review**

This Policy must be reviewed by Valitor Compliance at least annually. Any changes to the Policy must be approved by the Board of Directors.