

Complaints Handling Procedure

Where a consumer expresses dissatisfaction with a product or service provided by the firm, the complaint will be dealt with in accordance with this procedure and the requirements of the Consumer Protection Code 2025.

Purpose and Scope

This procedure outlines how the firm manages and resolves complaints relating to financial services provided to consumers under the Consumer Protection Code 2025.

The firm is committed to:

- handling complaints fairly, consistently and in a timely manner;
- ensuring complaints are addressed in a clear and respectful way;
- taking all reasonable steps to resolve complaints to the satisfaction of the complainant;
- identifying trends or weaknesses in processes and implementing corrective actions where appropriate; and
- ensuring consumers are informed of their right to refer unresolved complaints to the Financial Services and Pensions Ombudsman (FSPO).

Definition of a Complaint

A complaint is any expression of dissatisfaction made by, or on behalf of, a consumer relating to the provision of a financial service by the firm.

Complaints may be received orally or in writing and may be submitted by post, email or other electronic means.

Record Keeping and Governance

- The firm maintains a central complaints register and supporting complaint files.
- All complaint records, correspondence and related documents will be retained for a minimum period of six years.
- Systems and controls are in place to track, monitor and manage complaints through to resolution.

Receipt of Complaints

Oral Complaints

Where a complaint is received verbally, the firm will:

- confirm the details of the complaint with the consumer;
- offer the consumer the opportunity to have the complaint handled through the formal complaints procedure; and
- Investigate the complaint based on the firm's understanding of the issues raised.

Written Complaints

The firm facilitates complaints made in writing, including by post and electronic communication.

Acknowledgement of Complaint

The firm will acknowledge receipt of each complaint in writing within five working days.

The acknowledgement will include:

- confirmation that the complaint is being investigated;
- a copy of the firm's complaints handling procedure;
- details of the anticipated timeframe for resolution;
- notification that the consumer may refer the matter to the Financial Services and Pensions Ombudsman (FSPO) if dissatisfied with the outcome or if the complaint remains unresolved after 40 business days;
- contact details for the FSPO.

Complaint Handling and Communication

- The firm will assign a point of contact to the complainant for the duration of the investigation.
- Complaints will be investigated objectively and as quickly as possible.

- The firm will provide progress updates on paper or another durable medium at intervals not exceeding 20 working days, starting from the date the complaint was received.

Timeframes for Resolution

The firm will aim to investigate and resolve complaints within 40 working days of receipt.

Where resolution is not possible within this timeframe, the firm will:

- inform the complainant of the expected timeframe for completion; and
- remind the complainant of their right to refer the matter to the Financial Services and Pensions Ombudsman (FSPO), including providing contact details.

Outcome of Investigation

Within five working days of concluding the investigation, the firm will issue a written response outlining:

- the decision reached and the reasons for that decision;
- details of any settlement or offer where applicable;
- the consumer's right to refer the complaint to the Financial Services and Pensions Ombudsman (FSPO); and
- FSPO contact information.

Where it becomes apparent that the complainant remains dissatisfied and no further progress can reasonably be made, the firm will promptly notify the complainant of their right to refer the matter to the FSPO.

Management Oversight and Continuous Improvement

A senior manager will review each complaint file prior to closure to:

- ensure the complaint has been handled in accordance with this procedure;
- identify any recurring issues or control weaknesses; and
- implement improvements to procedures or staff practices where necessary.

Any procedural changes identified will be communicated to relevant staff and incorporated into the firm's documented procedures.

Responsibility for Complaints

The person responsible for complaint handling within the firm is:

Contact for Financial Services and Pensions Ombudsman:

Financial Services and Pensions Ombudsman,
Lincoln House,
Lincoln Place,
Dublin 2,
D02 VH29.
Tel. +353 1 567 7000
info@fspo.ie