

Complaints Handling Policy

29 April 2022

I. Introduction

BCR Co Pty Ltd (hereinafter referred to as the “Company”) is private limited company incorporated in the British Virgin Islands, (Company No. 1975046), licensed and regulated by the British Virgin Islands Financial Services Commission – (License Number SIBA/L/19/1122), having its Registered address at Trident Chambers, Wickhams Cay, PO Box 146, Road Town, Tortola, British Virgin Islands. This Complaints Handling Policy (the “Policy”) establishes procedures for BCR Co Pty Ltd (“the Company”) to effectively manage and resolve complaints received from clients.

1. Control Objective

This Policy’s objective is to maintain the confidence of the company’s clients when they have a complaint and, therefore, minimize the potential risk of damage to our reputation and reduce the risk of litigation by handling complaints from our customers or prospects in a timely, effective, and consistent manner.

2. Responsible Persons

The Compliance Officer of the Company is designated as responsible for complaints management function, namely the application of this policy, and to review this policy on a regular basis to ensure that it continue to comply with industry laws, regulations, guidelines and best practices and investigation. The Compliance Officer of the firm is also responsible to communicate this firm’s policy to all employees, officers, directors, representatives, and advisors of the firm.

All complaints will be forwarded to the Compliance Officer, regardless of how they originate. The Customer Service (CS) Manager will screen all complaints and forwarded them to the relevant delegated person who will operate on behalf of the Compliance Officer and who are responsible for reporting any resultant action and the outcome to the Compliance Officer.

The Customer Service (CS) Manager is responsible for monitoring and reporting minor complaints to the Compliance Officer. The CS Manager shall maintain a record of all complaints that may be required to be produced at any time without notice. The record shall include information identifying the complainant, the reason for the complaint and the progress of the matter.

The Board is responsible for handling serious complaints, working together directly with the Compliance Officer.

II. Purpose

1. The purpose of our Complaints Handling Policy is to:

- i. Recognize, and protect customers’ rights, including the right to comment and complain;
- ii. Provide an efficient, fair, and accessible mechanism for resolving customer’s complaints;
- iii. Provide information to customers on the complaints handling process.

III. Definitions

1. Complaint means ‘a genuine expression of dissatisfaction or concern regarding the Company’s services, or the complaints handling process itself.’ A complaint may be made by, fax, email, in writing and via the Company’s website. Verbal complaints should be documented immediately by the employee who receives the complaint.

2. 'Complainant' means the person or organization making the complaint.
3. 'Client' or 'Customer' means a person or organisation receiving, a service, or engaged in a business relationship.
4. Dispute means a customer's formal disagreement with the products and services of the Company which leads to some type of internal or external review or determination.

IV. Commitment

1. We are committed to efficient and effective complaints management. Our commitment involves:
 - i. encouraging an organizational culture that welcomes complaints as an opportunity to improve services
 - ii. the development and maintenance of a computerized Complaints System to manage complaints;
 - iii. the adoption and dissemination of this policy 'BCR Co Pty Ltd Complaints Handling
 - iv. Policy'; and
 - v. Reporting information about complaints management in executive and Board reports.

V. Fairness

1. We recognize the need to be fair to both the complainant, the Company and employee against whom a complaint may be made.
2. If a customer complains, we will:
 - i. treat the complainant with tact, courtesy, and fairness at all times;
 - ii. maintain appropriate confidentiality of the complaint at all times; and
 - iii. not victimize or harass the complainant because of any complaint he/she makes against us.

VI. Resources

1. We have resources committed to the handling of complaints by way of a customized, computerized Complaints Log System that is available only to the Compliance Officer and Customer Service Support for handling and monitoring the complaints.

VII. Visibility of the complaints process

1. We promote the existence of our Complaints Handling Policy through posting this policy on our website.

VIII. Procedure

1. Filing Complaints
 - i. The clients willing to submit a complaint are advised to complete a Complaint Form and to send it to the Company through the following: Send an email with an explanation of the complaint to compliance@thebcr.com.

2. How your complaint will be handled

- i. Upon receipt of a client complaint, the Company will register the complaint directly to our Complaints Log System, giving it a unique reference number. The unique reference number will be communicated to the complainant on our initial response letter within a reasonable time, and generally within 7 business days of receipt of the complaint. The unique reference number should be used in all future contact with our Company.
- ii. We shall then thoroughly examine all complaints, our procedures for handling complaints are ruled to be fair and unbiased. We will then review the complaint and determine whether there is enough sufficient information to proceed with resolving it. We may ask you for further information or clarification.
- iii. We aim to resolve any complaint within 30 days from the date on which we received your complaint. This may not always be possible, as sometimes the complexity of the complaint may require more time to investigate fully. If we are unable to resolve your complaint within 30 days of receipt, we will contact you to explain why we are not able to resolve your complaint and give you an indication of when we will make further contact.
- iv. In the unlikely event that your complaint has not been resolved within three months of original receipt, we will send you a letter explaining why we have still not resolved your complaint and provide you with an expected finalization timeframe. The Company shall immediately inform the Commission of the complaint and shall the complainant, if he wishes, shall inform the Commission directly of his complaint and/or take any other relevant actions (including arbitration and/or court procedures).
- v. Our final response will advise of our findings and, where appropriate, what action is being taken to resolve the matter. We will address the subject matter of your complaint, and where the complaint is upheld, we will offer a resolution that is consistent with treating all our customers fairly.
- vi. If you contact us during our investigation and the member of staff handling your complaint is not available, then another member of our team will be able to help you.

3. Appealing a decision – external review

- i. When providing a final decision that does not fully satisfy the complainant's demands, we will notify the complainant in writing with a thorough explanation of our position on the complaint and set out the complainant's option to maintain the complaint e.g., through the Commission or the relevant Courts.

IX. Charges

1. Complainants shall be able to file complaints and receive the above procedures for complaints free of charge.

X. Employee training and counselling

1. Where a complaint is made about an employee, whether it is about the employee's general manner or about the employee providing wrong information, and after investigation if we consider the complaint is justified, the employee will be provided with training and/or counselling.

XI. Information of the relevant authorities

1. Financial Services Commission
 - i. Website: <https://www.bvifsc.vg/>
 - ii. Telephone Number: 284-494-1324 or 284-494-4190
 - iii. Address: Pasea Estate, P.O. Box 418, Road Town, Tortola, VG 1110, British Virgin Islands

XII. Storage of complaint records

1. The Company shall maintain all complaints or grievances for a minimum period of seven years. Records of all complaints will be retained in our Complaints Log System, for confidentiality, monitoring, and evaluation purposes. Access to the complaint's records will be restricted to authorised staff only.

XIII. Review

1. The Complaints Handling Policy will be reviewed at regular intervals to ensure it meets the needs of the Company and its customers by the Compliance Officer and will be approved by the Board of Directors of the Company.