

GUERNSEY COMMUNITY SAVINGS LBG

COMPLAINTS PROCEDURES

Guernsey Community Savings LBG (“GCS”) is registered with the Guernsey Financial Services Commission (“GFSC” or “Commission”) as a Non-Regulated Financial Services Business. As such GCS is subject to all laws, rules and regulations relevant to the combatting of financial crime and terrorist financing, including the provisions of the GFSC’s Handbook on Countering Financial Crime and Terrorist Financing. A relevant AML/CFT Business Risk Assessment and supporting AML/CFT Manual have been approved by the Board of Directors of GCS in this regard.

Separately GCS has introduced certain Policies and Procedures covering all aspects of the company’s business activities, and such Policies and Procedures are contained in the company’s Operational Procedures Manual.

This Complaints Procedure forms part of the Operational Procedures Manual.

It is an expectation under normal business practices for the nature of services provided by GCS and its customers (generally a retail-type service), and a requirement of the Commission, that a formal Complaints Procedure will be in place, and details made available to customers if and when required. Rather than adopting arbitrary complaints standards, GCS has chosen to follow the directions under the codes of practice for both trust and corporate service providers as a guide to the procedures to be followed. Such codes require that every licensee shall have in operation an effective and robust complaints handling procedure for consideration, together with a central recording system and specific reporting requirements. Whilst these codes are not directly applicable to GCS, they are felt to be comprehensive and relevant to the type of services being provided to GCS customers.

Complaints

A complaint is defined as any oral or written expression of dissatisfaction, regardless of whether it is justified or not, from, or on behalf of a person about the provision of, or failure to provide a service where the complainant feels or alleges that he has suffered or may have suffered financial loss, material distress or material inconvenience.

Staff should follow the below procedures to ensure that their handling of complaints is appropriate.

1. Any complaint of any nature whether verbal or written shall immediately be referred to the GCS Chairman. In the absence of the Chairman, reference will be made to one of the GCS Directors for review and processing in the meantime. If the Chairman or any Director are implicated in the complaint,

they will be excluded from the review process apart from any involvement or input as may be required from them during the review process.

2. The Chairman shall maintain a record of all complaints received and on receiving notification of a new complaint will enter appropriate details in the record.
3. The circumstances of the complaint will be fully investigated as a matter of priority and within **three business days** of the receipt of the complaint either a full written reply will be dispatched or the complainant will be advised in writing that the situation is being reviewed and that a full reply will be provided within a further **ten business days**.
4. Copies of all written communications sent to a complainant in relation to the complaint shall also be provided to the Chairman who will note his record accordingly. A file will be opened for each client in relation to any complaints.
5. The Chairman shall also be notified of complaints which have been settled and the terms on which settlement has been achieved. For this purpose a complaint is deemed to be settled when a full reply has been sent to the complainant and no response has been received after a period of **four weeks** has elapsed from the date on which the reply was dispatched, or if the complainant has confirmed that they are satisfied with the settlement and consider the complaint to be addressed and closed.
6. The record of complaints will be maintained by the Chairman for a period of **five years** prior to archiving or destruction.

Significant Complaints

1. A significant complaint is defined as a complaint, which alleges a breach of the Regulations set out by the Commission with which GCS must or should comply, or a breach of any applicable Law, or one that alleges bad faith, malpractice or impropriety or repetition of a matter previously the subject of a complaint (whether significant or not). A complaint is not considered significant if it relates to a minor mechanical or clerical error.
2. The Commission must be notified immediately of any significant complaints received, and any unsettled complaints (significant or otherwise) after 3 months from receipt of the complaint.
3. Refer to the Codes of Practice for Corporate Service Providers and for Trust Service Providers (the full codes are available on the GFSC website) for further details and a glossary of terms used. As noted above, these Codes do not directly apply to GCS as a Non Regulated Financial Services Business, but

they do represent good and best practice and as such the Board has elected to follow the guidelines contained in the Codes as they relate to the company's business.

Channel Islands Financial Ombudsman ("CIFO")

As a service targeted to retail customers resident in the Bailiwick of Guernsey, customers will have recourse to the services of CIFO if it is felt that any complaint has not been handled properly or dealt with to a satisfactory conclusion.

If a complaint is filed with CIFO at any time, GCS will cooperate in any investigation in a completely open and honest manner, and provide any records that CIFO may require to support the investigation.

The Board will consider any such complaints, the background to the complaint, and any findings by CIFO, and determine whether any further internal action is required, and whether any additional staff training or new procedures may be required.

The Channel Islands Financial Ombudsman can be contacted at: <https://www.ci-fo.org/>

Publication of Complaints Procedure

Details of this procedure, the contact details and also links to CIFO will be published on the GCS website.

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