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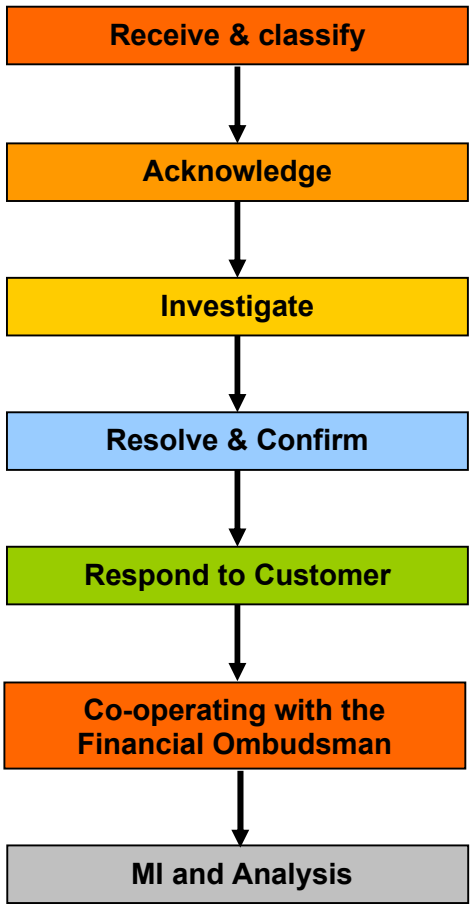
Complaint Handling Procedure

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Process Overview

The following key steps must be followed for all customer complaints received by the staff of Business Mortgage Solutions



The requirements for each of these steps is detailed below

1. Receive & classify

Summary
Ensure that all potential issues are captured by Business Mortgage Solutions and classified for escalation, review and action as required.

1.1 Any complaint, issue, or negative customer interaction (whether this is formally logged by the customer or not), must be logged and classified for action.

The FCA defines a complaint as: 'Any expression of dissatisfaction, whether oral or written, and whether justified or not, from or on behalf of an eligible complainant about the firm's provision of, or failure to provide, a financial service'.

1.2 Business Mortgage Solutions will deal with complaints promptly and fairly including complaints that could be referred to the Financial Ombudsman Service (FOS). Some of these rules also apply to certain branches of firms elsewhere in the European Economic Area (EEA) and certain EEA firms carrying out activities in the United Kingdom under the freedom to provide cross border services.

1.3 All complaints must be prioritised as follows:

1.4 **Priority 1 – urgent**, potential high impact to customer or firm. **The Service Level Agreement (SLA) requires a response to the customer within 3 working days.**

1.5 Priority 1 could be used in a situation where the situation has caused immediate detriment which could impact upon Business Mortgage Solutions' brand or reputation or the customer.

1.6 **Priority 2, - non-urgent**, lower business impact. The SLA requires a response to the customer within 1 working week.

1.7 Discretion and flexibility should be exercised in prioritising all complaints:

- The staff member logging the complaint should review the complaint and its priority with the Office Manager before proceeding to the next step.
- Office Managers will decide on the appropriate person(s) to carry out subsequent steps, including the investigation.
- <u>All Priority 1 complaints must be escalated immediately to the Office and/or Operations Manager</u>.

2. Acknowledge

Summary
Ensure that every complaint receives a formal written acknowledgement, containing an expectation of when they will receive a response, and the person dealing with it.

- All complaints, regardless of priority, should receive a pro forma (see below) acknowledgement sent via email on the day of receipt.

3. Investigate

Summary
Follow up all aspects of the complaint, both internal and external, to ensure that the key facts are identified and clarified.

- The priority of the complaint will drive the timescale for completion 3 days for urgent or 1 week for non-urgent.
- All areas of interaction and communication should be established (who, what, where, when, why etc.) and documented where possible.

4. Resolve & Confirm

Summary
Ensure that the final response letter is clear and fair. Also, confirm the proposed action and resolution.

- Ensure that the proposed resolution meets corporate guidelines and does not prejudice Business Mortgage Solutions in any unnecessary legal or financial manner.
- Document the proposed action and discuss and agree with Office and/or Operations Manager.
- Discuss and review the solution from both the corporate and customer viewpoint to ensure fairness and clarity. Ensure the complaint has been investigated fully and resolved fairly.

- The review should include recognition and documentation of any underlying issues that have contributed to the complaint and recommendations for actions to prevent further occurrence.

- This data will be used for root cause analysis to remedy any recurring or systemic problems.

5. Respond to Customer

Summary
Provide the customer with the resolution within the timescales promised.

The details of the findings and proposed resolution should be clearly explained (in written or verbal form as appropriate) to the customer- within the agreed timescales.

If the complaint is resolved by close of the third business day, a Summary Resolution Communication will be sent. This is a written communication which;

- refers to the fact that the complainant has made a complaint and informs the complainant that the respondent now considers the complaint to have been resolved;

- tells the complainant that if he subsequently decides that he is dissatisfied with the resolution of the complaint he may be able to refer the complaint to the NACFB with further recourse the Financial Ombudsman.

- provide the website addresses of the NACFB and Financial Ombudsman Service

If this cannot be done on time, the customer must be contacted to provide an update to their complaint and state in a written communication that Business Mortgage Solutions will provide a final response within 8 weeks

5. Co-operating with the Financial Ombudsman Service

Summary
All complaints should aim to resolve complaints at the earliest possible opportunity, minimising the number of unresolved complaints which need to be referred to the Financial Ombudsman Service.

If the complaint is escalated to the Financial Ombudsman Service by a eligible complainant within six months of the final decision being sent by your firm, there is an requirement to cooperate fully with them and comply promptly with any settlements or awards made by it.

Contact details for the Financial Ombudsman:

Financial Ombudsman Service, Exchange Tower, London E14 9SR.
Consumer helpline: 0800 023 4567 1001
Email: complaint.info@financial-ombudsman.org.uk.

6. MI and Analysis

Summary
Ensure that Business Mortgage Solutions is aware of complaints and any underlying issues or systemic causes. Plan actions to mitigate these and prevent future recurrence.

- All complaints should be reviewed on a monthly basis. Data will be collated and processed by the senior partner.

- Root Cause Analysis should then be conducted, and steps should be taken to remediate the issue and prevent it from reoccurring. This may identify weaknesses in the firm's governance, systems, controls and risk management framework. The remedial action will tackle the root cause and act as a continuous improvement process to address customer detriment and fair customer outcomes.