



COMPLAINT HANDLING POLICY

This document describes the Complaint Handling Policy of CAPITAL SHIELD SECURITY LTD which has been implemented to ensure compliance with the laws and regulations relating to complaint handling. This Policy applies to all employees, officers, director, representatives and advisors of the company. CAPITAL SHIELD SECURITY LTD seeks to maintain and enhance our reputation of providing you with high quality products and services. We value complaints as they assist us to improve our products, services and customer service. CAPITAL SHIELD SECURITY LTD is committed to being responsive to the needs and concerns of our customers or potential customers and to resolving your complaint as quickly as possible.

Control Objective:

The objective of this policy is to ensure:

- Both you and our staff understand our complaints handling process,
- Your complaint is investigated impartially with a balanced view of all information or evidence,
- We take reasonable steps to actively protect your personal information,
- Your complaint is considered on its merits taking into account individual circumstances and needs

Person Responsible:

Operations and QMS managers are hereby designated as responsible for the application of this policy, and to review this policy on a regular basis to ensure that it continue to comply with security industry laws, regulations, guidelines and best practices. Operations and QMS managers are also responsible to communicate this firm's policy to all employees, officers, director, representatives and advisors of the firm.

Definitions:

A complaint shall be deemed to mean any written statement of a client or any person acting on behalf of a client alleging a grievance involving the conduct, business or affairs of the firm or any employee, representative, officer, director or advisor of the firm.

Although the definition of "complaint" refers to only written complaints, there may be instances where the firm receives a verbal complaint from a client which will warrant the same treatment as a written complaint.

Such situations depend upon the nature and severity of the client's allegations and require the professional judgment of the individual who received the complaint.

- A complaint should include at least one of the three following elements: ·
- Complaint about the firm; ·
- Potential damages or damages suffered by the client; or
- Request of corrective measures

For greater certainty, errors that the firm accepted to correct are not considered as complaints unless repetition or recurrence causes grievance to a client. A Complaint Log is a Database to track key elements of the complaint process and category in order to identify potential trends or concerns and to produce reports.



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Requirements:

It is the policy of the firm to:

- Handle complaints from customers or prospects in a timely, effective, fair and consistent manner.
- To record complaints centrally in the complaints log.
- To report complaints to the company whose product is involved as well as, where applicable, to the company that sponsors the advisor's license

Acknowledgement Letter:

When the firm receives a complaint, an acknowledgment letter must be sent to the client within 5 business days.

This letter must include the following elements: ·

- Name of the person responsible for handling the client's complaint; ·
- Key elements of the firm's Complaint Policy; and
- Expected delay of the outcome

Complaint Log

1. All complaints must immediately be reported to [name(s) or title(s) of the individual(s), within the firm, who has the responsibility to ensure that all complaints are handled according to the policy];

2. All complaints must be logged in the Complaint Log. The Complaint Log must, at least, include the following information: ·

- Date of complaint;
- Complainant's name;
- Nature of the complaint and the circumstances;
- Name of the person who is the subject of the complaint;
- The product or the services which are subject of the complaint; and
- The date and conclusions of the decision rendered in connection with the complaint.

3. Complaints in the Complaint Log must be maintained for a period of 7 years, following the resolution date. Change of Procedures and Disciplinary Measures Operations manager must monitor the complaint log and ensure that appropriate disciplinary measures are taken if necessary and provide recommendations for change in the company's procedures if appropriate.

A handwritten signature in black ink, appearing to be "J. Smith", is written over a horizontal line.

Managing Director