

CONFIDENTIAL



**COMPLAINTS POLICY
AND PROCEDURES**

Version 8

Summary of Changes in the Complaints Policy

The main objective of the Complaints Policy is to ensure that all complaints are dealt with promptly and consistently and are handled with courtesy and fairness. The main changes that have been made in this policy and are being presented for approval include the following;

- The definition of a complaint which was not in the previous policy.
- The new policy now stipulates that all personal or sensitive information provided in the context of a complaint will be confidential, subject to the need to disclose information as required by statutory authorities.
- Further, the new policy states that Heads of Departments have a responsibility to inform, support and monitor staff to ensure that the policy and procedures are properly implemented.
- The new policy also informs that threats or abuse towards staff is unacceptable. Staff are also expected to treat complainants with courtesy, respect and fairness. The new policy specifies that any threats or acts of violence will cause direct contact with the complainant to be discontinued.
- The proposed policy also denotes that all incidents of harassment or aggression will be documented and referred to the Head of Audit and Compliance and/or the Chief Executive Officer. In appropriate circumstances these matters may be referred to the police and Norsad may consider taking appropriate legal action against the complainant, if necessary, without prior warning.
- Finally, the new policy recommends that the Complaints Policy be reviewed by the Governance Committee at least biennially, or as soon as the need is identified.

NORSAD CAPITAL COMPLAINTS POLICY AND PROCEDURE

1. Foreword

Norsad Capital Limited is committed to high standards of ethical, moral and legal business conduct. In line with these principles and Norsad Capital’s commitment to be responsive to the needs and concerns of our clients, this policy aims to provide guidance for clients and other associated parties to raise concerns related to Norsad Capital business. Should a person wish to proceed with a complaint, the procedure set below offers the mechanism for a response or resolution. The policy also acknowledges that some complaints in the form of negative feedback may not require a resolution or formal follow-up.

2. Definition of a complaint

A complaint is an expression of dissatisfaction, by one or more people about the standard of service provided by Norsad Capital.

A complaint may relate to the following allegations:

- Failure to provide a service,
- Inadequate standard of service,
- the behavior of our staff in delivering that service, and
- any action, or lack of action, by our staff.

3. Confidentiality

All personal or sensitive information provided in the context of a complaint will be dealt with confidentially, subject to the need to disclose information as required by statutory authorities, and/or as a result of statutory, legal or parliamentary obligations placed on Norsad.

4. Complaints Procedure

If a complaint cannot be resolved through initial dialogue with persons concerned, or requires escalation, the details of the complaint should preferably be made in writing setting out clearly the following details which will assist Norsad in following up effectively:

- a. Name and contact details of person making complaint.
- b. Nature of relationship with Norsad and contact person within Norsad.
- c. Nature of the complaint and applicable details such as where or when incident or conduct occurred.
- d. Any other documentation supporting the complaint.

The written complaint should be made to the email address **complaints@norsadfinance.com** and marked for the attention of the appropriate contact position indicated in the table below.

Complaint against	Contact Position
Norsad Staff or Business-Related Complaints	Head of Audit and Compliance / Chief Executive Officer
Chief Executive Officer	Chair of the Governance Committee
Directors or Alternate Directors	Chair of the Governance Committee
Chair of the Governance Committee / Chair of the Board	Chair of the Human Resources & Remuneration Committee

5. Acknowledgement and Response to Complaints

The recipient shall endeavor to acknowledge the complaint upon receipt and in any case within two working weeks of receiving the complaint. Norsad shall subsequently undertake a review of the complaint which could involve further communication with the person making the complaint. Norsad shall endeavor to resolve complaints within four weeks of receiving the complaint but acknowledge that this will not be possible on all occasions. If the response or resolution of the complaint takes more than four weeks, Norsad will contact the person making the complaint to update them on the process including reasons of the delay and expected resolution date.

6. List of remedies

- A full apology, explaining what happened and/or what went wrong.
- Remedial action, which may include reviewing or changing a decision on the service given to an individual complainant.
- Provide the service required in first instance (immediately, if appropriate).
- Putting things right (for example a change of procedure to prevent future difficulties of a similar kind, either for the complainant or others).
- Additional training or supervision of staff; or a combination of both.

Should the person making the complaint not be satisfied with the outcome, the complainant has a right to request a reconsideration of the response or resolution. As such, the request must be in writing and detail the concerns with the outcome or the process. In the event that the person making the complaint has exhausted the process as captured above and remains unhappy with the outcome, the complainant is at liberty to seek the relevant legal recourse.

7. Recording complaints and learning

Quality of service is an important measure of our effectiveness. Learning from complaints is a powerful way of helping continuous improvement at Norsad and enables us to better deliver to our values and standards. Complaint details, outcomes and actions taken are recorded and used for service improvement. We record all complaints we receive and collate data from them to help us understand what types of problems are most prevalent, and how well we are doing to resolve them.

8. Encouraging feedback

As well as learning from complaints, we are also interested in ideas on how we might do things better. We would also like to be informed when we do things well. Any comments received will be passed on to the relevant team and we will use them to help improve our service and the way we do things.

9. Abusive or Unreasonable Behavior

Norsad understands that people may act out of character in times of distress or due to frustration. Complainants who harass, or have been abusive, aggressive or threatening on one or more occasions towards our staff - or their families or associates - directly or indirectly, will be considered unreasonable.

Our staff have the right to undertake their work free from abuse, threats and harassment, or vexatious and repetitive complaints. We expect our staff to be treated with courtesy and respect. Norsad has a duty to protect the welfare and safety of staff and considers that violence, threats or abuse towards staff is unacceptable. Staff are also expected to treat complainants with courtesy, respect and fairness. Any threats or acts of violence will cause direct contact with the complainant to be discontinued. Violence includes behaviour or language (written, oral, or in tone or otherwise) that may cause staff to feel afraid, threatened or abused

Where complaints are deemed vexatious, the complainant will be notified in writing that no further correspondence will be entered into on the matter in question. Where unreasonable or abusive behaviour is determined, the complainant will be notified in writing that no further contact will be undertaken, and this will apply to all Norsad contacts. A copy of this policy will be included and, if and where appropriate, a no-contact period specified. A decision to restrict contact may be reconsidered if the complainant subsequently demonstrates more reasonable behaviour.

All incidents of harassment or aggression will be documented and referred to the Head of Audit and Compliance and/or the Chief Executive Officer. In appropriate circumstances these matters may be referred to the police and Norsad may consider taking appropriate legal action against the complainant, if necessary, without prior warning.

10. Staff Training

This policy will be published to all our staff and built into induction and stakeholder engagement training with the aim of empowering staff to resolve complaints, where it is possible and practical for staff to do so, starting with the first point of contact with clients.

Heads of Departments have a responsibility to inform, support and monitor staff to ensure that the policy and procedures are properly implemented.

11. Review

This policy shall be reviewed by the Governance Committee at least biennially, or as soon as the need is identified or as and when there are reasonable changes in best practice or relevant legislation.