

### Policy Statement

Collinson & Co is committed to positive, supportive and proactive resolution of customer service complaints. We have established client focused policy and procedures for complaints in order to provide best services, to properly manage client relationships and to report to Risk & Compliance Committee. The Complaints Officer for the designated business group is Costa Feneridis.

### Collinson & Co entities covered by this Policy

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This Policy applies to the Collinson & Co business units operating under the trading name “Collinson & Co” or “Collinson”:

- Collinson Crowdfunding Limited (CCF)
- Collinson Forex Limited (CFX)
- Direct FX Limited (DFX)

### Policy

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1. Definition:

A complaint is an expression of dissatisfaction with the way in which we have gone about our work, including;

- the way the Client has been treated by the staff;
- the staff’s actions or inactions on a matter;
- any other matter about the way in which the staff go about the services the Organisation provide.

2. Accessibility:

- make it easy for Clients to complain;
- acknowledge Clients’ complaint and address it as promptly as possible.

3. Fairness:

- aim to deal with Client’s complaint fairly and properly;
- deal with complaints in an even-handed, objective way;
- make sure information provided to the Client is accurate and up-to-date;
- take all complaints seriously and deal with them in a manner consistent with the Ombudsman’s Effective complaint handling guide: <https://www.ombudsman.parliament.nz/sites/default/files/2019-03/Effective%20complaint%20handling.pdf>

4. Responsiveness:

- communicate within expected timeframe for dealing with complaints;
- resolve any problems identified and make changes accordingly.

5. Efficiency:

- appoint Complaints Officer;
- consider Clients’ complaints as efficiently as possible, assigning appropriate staff within the Organisation to work with the Complaints Officer.

### Procedure

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General Procedure	<ol style="list-style-type: none"> <li>1. If a complaint has been raised, it will be lodged and assigned to the Complaints Officer to investigate.</li> <li>2. The Complaints Officer shall consult with the staff who are handling or have handled the relevant matter.</li> <li>3. Receipt of the complaint shall be acknowledged within 2 working days and the Complaints Officer shall inform the Client that actions have been taken and expected timeframe of resolution.</li> <li>4. The Complaints Officer shall seek further information from the Client if necessary.</li> <li>5. The Complaints Officer shall present the findings regarding the complaint to the Risk &amp; Compliance Committee (the Committee) and consult the Committee before answering the complaint.</li> <li>6. A complaint shall be answered within 20 working days of receipt.</li> <li>7. The response of a complaint shall be approved by the Committee.</li> <li>8. If the complaint cannot be resolved to the satisfaction of both parties, the complainant shall be advised of their right to be referred to any registered dispute resolution schemes providers the entity is a member of.</li> </ol>
Record Keeping	<ol style="list-style-type: none"> <li>1. All complaints shall be recorded on the Organisation's Complaints Register, whether it is a minor complaint, a serious complaint or a follow up complaint.</li> <li>2. All records regarding complaints must be maintained for at least 5 years after the complaint is resolved.</li> </ol>
Rectification	<p>If any deficiency is discovered in the system, procedures or controls that the Organisation has put into place during the course of dealing with the complaint, it shall be rectified as soon as possible.</p>