

# HANDLING A COMPLAINT

EuroCredit Bank





# COMPLAINT HANDLING POLICY

FOR PROSPECTIVE CLIENTS, ELIGIBLE COUNTERPARTS AND PARTNERS

INTRODUCTION .....	3
MAKING A COMPLAINT AS A CLIENT .....	3
ADDRESSING A CLIENT'S COMPLAINT .....	3
COMMITMENTS AND GUIDING PRINCIPLES .....	4
OUR TIMETABLE FOR RESPONDING TO A COMPLAINT.....	4
WHAT A COMPLAINT AND EXPRESSION OF DISSATISFACTION IS .....	5
CLOSING A CLIENT'S COMPLAINT.....	5
COMPLAINT RECORD KEEPING .....	5

## **INTRODUCTION**

This policy applies to the employees of **EuroCredit Bank** – herein referred to as “the bank” – which are authorised and regulated by the management as it mirrors how a regulated firm should deal with a client complaint.

The bank’s employees are required to establish, implement and maintain effective and transparent complaints management policies and procedures for the prompt handling of clients’ complaints.

This policy contains rules and guidance on how we deal with complaints promptly and fairly and also is designed to provide clear, accurate and up-to-date information about the firm’s complaints handling process and sets out the process that the bank will follow in the event that a client wishes to make a complaint.

**EuroCredit Bank’s** senior management are responsible for the implementation of the complaints policy and for monitoring compliance with it. The head of compliance and senior management are responsible for analyzing recurring systemic problems and for identifying root causes common to complaints.

## **MAKING A COMPLAINT AS A CLIENT**

A client can make a complaint by any reasonable means – for example, email or telephone and it is free of charge to complain. The bank’s head of compliance will independently review any client complaints which are referred by the customer service or directly by the client.

The head of compliance will also analyze complaints and complaints handling data to ensure that they identify and address any risks or issues.

## **ADDRESSING A CLIENT’S COMPLAINT**

The bank will investigate the client complaint competently, diligently and impartially with a view to deciding whether the complaint should be upheld and whether any remedial action and redress may be appropriate.

Additional information may also be requested from the client, as necessary. The conclusions will be forwarded to the client in a final response. In the event that the bank decides that redress is appropriate, then the bank will aim to provide the client with fair compensation for any acts or omissions for which the firm is responsible.

If the client accepts bank’s offer, then the bank will promptly provide the compensation to the client.

## **COMMITMENTS AND GUIDING PRINCIPLES**

EuroCredit Bank will promptly acknowledge any complaint in writing. In this acknowledgement, the firm will provide the name and title of the person that is handling the complaint and they will have the necessary authority to investigate and settle the complaint.

## **OUR TIMETABLE FOR RESPONDING TO A COMPLAINT**

Once the bank has acknowledged the complaint, then the bank will keep the client informed of the progress. Within eight weeks of receiving a complaint, the bank will either send a final response to the client or a written explanation as to why the bank is not yet in a position to make a final response, and when the bank expects to provide one.

## **INFORMAL PROCEDURE**

If a client is unhappy with the bank's service, then they may raise this with any employee who will direct the complaint to the relevant customer service representative who will try to resolve the complaint informally within three working days after the complaint was made. This may involve telephone or e-mail communication as appropriate to the nature of the complaint.

If the complaint is not resolved within this timeframe, then the customer service will inform the client by e-mail that they will refer the complaint to the relevant senior officer who will engage with the client further.

The customer service representative will have the discretion to escalate a complaint in the Informal Procedure at any time at their discretion should they identify that the formal procedure is more appropriate sooner than this timeframe.

## **FORMAL PROCEDURE**

A customer service representative will refer a complaint to the relevant senior officer if the informal procedure ends as unresolved or where it is appropriate for the formal procedure to be followed sooner.

The relevant senior officer will:

- Investigate the items raised by the client and will respond to the complaint with a final response within ten working days of acknowledgement.
- Provide a final response within ten working days, OR will write to the client to explain the reasons for any delay, although they will aim to provide a final response within fifteen working days of acknowledgement.

EuroCredit Bank's response will be to:

- Inform the client that if they remain dissatisfied following the conclusion of the complaint investigation and receiving the bank's final response, then the client may be able to refer the complaint to the financial conduct authority of the country's region of operation.

### **WHAT A COMPLAINT AND EXPRESSION OF DISSATISFACTION IS**

A complaint, whether oral or written is more serious than an expression of dissatisfaction, as the client believes that they have suffered or may suffer financial loss, material distress or material inconvenience.

An expression of dissatisfaction would be if the client is not happy with the service that has been provided by the firm.

### **CLOSING A CLIENT'S COMPLAINT**

EuroCredit Bank will regard the complaint as closed in the following circumstances:

- Once the bank has sent the client a final response and the client has told the bank in writing that they accept an earlier response that has been sent by the bank;
- If the client refers their complaint to the financial conduct authority, and they inform the bank that the complaint has been closed.

### **COMPLAINT RECORD KEEPING**

A record of all complaints will be retained for quality control and reporting purposes, in accordance with our record retention policy and procedures. The bank will keep a record of all complaints received, all complaint correspondence and the measures taken for their resolution for six years after the closure of the complaint.



**EUROCREDIT BANK LLC**

Chau. de Louvain 3, 1210 Saint-Josse-  
ten-Noode, Belgium