

Complaints Policy and Complaints management procedures

Hilbert Investments Solutions Ltd

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Introduction

As a regulated financial institution Hilbert Investments Solutions Ltd. ("Hilbert") is required to comply with the Financial Conduct Authority ("FCA") DISP rulebook.

The FCA has set out specific rules and regulations for how authorised firms must handle and resolve complaints in respect of its regulated business and ancillary services.

Scope

A complaint is any expression of dissatisfaction, whether oral or written, and whether justified or not, from or on behalf of a person about the provision or, or failure to provide, a financial service which alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience.

All Hilbert's' customers or potential customers are able to make a complaint. This policy sets out the procedures the firm will follow in the event of a complaint.

Complaints Handling procedure

In the event that a customer wishes to make a complaint, this can be made verbally, by telephone or in person, or via a written communication delivered in person, via post, e-mail or fax. In the first instance, the complaint should be handled by the account manager responsible for the account, in conjunction with the Compliance Officer, and resolution of the complaint sought. If the complaint is capable of being resolved the same business day as it is received, any agreed course of action should be taken and a file note made and inserted on the customer's file, together with any copy correspondence. At this point in time, an entry should be made in the Complaints Register which is kept by the Compliance Officer.

In the event that a complaint is not capable of resolution the same business day as it is received, a written acknowledgement including a brief explanation of the substance of the complaint should be provided to the customer concerned. The letter will include a copy of the firm's procedures and the name and title of the person handling the complaint

In the event that a complaint identifies a systemic, recurring or specific problem, the Compliance Officer will advise the Board of Directors of the problem and seek to resolve it via discussion and the implementation of any conclusions arrived at.

Where a complaint has been resolved, a final response should be issued to the customer, unless it was resolved by the close of business on the business day following receipt, in which case no letter need be sent. A final response is a written response from the company which accepts the complaint and, if appropriate, offers redress (appropriate redress may not involve financial redress, it may, for example, simply involve an apology); or offers redress without accepting the complaint or rejects the complaint and gives reasons for doing so, and which informs the customer that, if he remains dissatisfied with the company's response, he may now refer his complaint to the Financial Ombudsman Service ("FOS") which, should he wish to do so, must be done within 6 months. The final response will include the FOS leaflet and address.

In any event, within 4 weeks of receiving a complaint, unless the customer has already indicated in writing acceptance of a response by the company (provided that the response informed the customer how to pursue his complaint if he remained dissatisfied), and in the event that a final response has not been issued, a holding response must be sent to the customer explaining why the company is not yet in a position to resolve the complaint and indicating when the company will make further contact (which must be within 8 weeks of receipt of the complaint).

Within 8 weeks of the receipt of a complaint the company must send to the customer a final response or a response which explains that the firm is still not in a position to make a final response, giving reasons for the further delay and indicating when it will be able to provide a final response, and informs the customer that he may refer the complaint to the FOS if he is dissatisfied with the delay, enclosing a copy of the FOS's explanatory leaflet and address.

In the event that a customer takes more than a week to respond to a communication, the 4 and 8 week time-frames will be extended by the amount of time in addition to a week that the customer takes to respond. Any final response must inform the customer that he may refer the complaint to the FOS if he is dissatisfied with it, (and that he must do so within 6 months should he wish to refer it), enclosing a copy of the FOS explanatory leaflet, unless the company has already done so.

A record of the complaint must be retained by the company for 5 years from the date of the receipt of the complaint. A report must be made to the FCA twice a year, via the FCA's Firms on Line electronic reporting system. This report specifies the total number of complaints received by the firm which were not settled by the close of business the business day after the receipt of the complaint in accordance with rule DISP 1.5.4.

A complaint will be deemed to be closed where the company has sent a final response or where the customer has indicated in writing acceptance of the company's earlier response.

Approved by the Board in June 2020