



# Client Complaints Manual

Owner:  
Approved by:  
Users:  
Version:

Risk & Compliance  
The Board of Directors  
All Department  
1.0



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## 1. Introduction

This Manual contains policies and procedures adopted by INOVEST B.S.C, (herein referred to as the “Company”) for the purpose of:

- a) Establish fair and transparent mechanism to handle client complaints
- b) Enable the Company to respond to complaints raised by the clients in a timely and cost-effective way;
- c) Boost the clients’ confidence in the Company’s administrative process, and
- d) Provide information that can be used by the Company to deliver quality improvements in its products, services, staff and complaint handling.

## 2. Scope

This policy applies to all type of complaints received from clients whether verbally or in writing, even in the event when a business continuity plan is operative. This Policy has been designed to ensure that:

- e) All complaints are handled fairly, effectively and promptly;
- f) Recurring systems failures are identified, investigated and remedied;
- g) The number of unresolved complaints referred to the CBB is minimized;
- h) The employee responsible for the resolution of complaints has the necessary authority to resolve complaints or has ready access to an employee who has the necessary authority; and
- i) Relevant employees are aware of INOVEST’s internal complaint handling procedures and comply with them and receive training periodically to be kept abreast of changes in procedures.

## 3. Complaints Officer

The Head of Risk & Compliance will be the Company’s Complaints Officer.

## 4. Principles for Effective Handling of Complaints

Adherence to the following principles is required for effective handling of complaints:

#	Principle	Details
1	Visibility	"How and where to complain" must be well publicized to clients and other interested parties, in both English and Arabic languages.
2	Accessibility	Complaints handling process must be easily accessible to all clients and must be free of charge.
3	Responsiveness	Receipt of complaints must be acknowledged in accordance with Section 6 (a) below.
4	Objectivity and Efficiency	Complaints must be addressed in an equitable, objective, unbiased and efficient manner.

## 5. Confidentiality

Client information must be protected and not disclosed, unless the client consents otherwise in writing. INOVEST must protect the client and client's identity as far as is reasonable to avoid deterring complaints due to fear of inconvenience or discrimination. In addition to client confidentiality, the process must ensure confidentiality for staff who have a complaint made against them and the details must only be known to those directly concerned.

## 6. Internal complaint handling procedure

### a) Receiving and acknowledging complaints:

It is important that INOVEST understands the exact nature of any complaint and therefore wherever practical all complaints must be received in writing (via post, fax or e-mail). In instances where a complaint is received orally (e.g. via the telephone), the details must be recorded exactly as provided by the complainant. All complaints received should be filled in the Complaint Form (Appendix 1).

The Complaints Officer must acknowledge in writing client the complaints within 5 working days of receipt.

### b) The appropriate investigation of complaints:

The Complaints Officer will make an initial assessment of the complaint and refer the matter to an appropriate staff member in the relevant business line, to investigate and draft a proposed response. If the complaint involved any legal or fraud case, the complaint will be escalated to the Head of Legal for further investigation.

Once the proposed response has been finalized, the Complaints Officer will assess the proposed response, and provide his/her comments. In the event there is an irreconcilable difference of opinion between the Complaints Officer and the relevant business unit or Head of Legal, in relation to how to address and resolve a complaint, the matter will be escalated to the CEO for final decision.

Once the complaint has been satisfactorily resolved with the client, the relevant business unit(s) will work, with the assistance of the Complaints Officer, to identify and remedy any specific or systemic issues to prevent such complaint.

### c) Notification of the decision to the client:

The Complaints Officer will respond in writing to a client complaint within 4 weeks of receiving the complaint, explaining their position and how they propose to deal with the complaint.

When INOVEST decided to provide the client with redress, the Complaints Officer must explain the options open to the client and the procedures necessary to obtain the redress. If the redress in the form of compensation is appropriate, INOVEST must provide the client with fair compensation and must comply with any offer of compensation made by it which the client accepts.

However, if the client is not satisfied with the response received, he/her can forward the complaint to the Compliance Directorate at the CBB within 30 calendar days from the date of receiving the letter from INOVEST.

## 7. Record Keeping

The Complaints Officer must maintain a record of all clients' complaints. The record of each complaint must include:

- a) The identity of the complainant;
- b) the substance of the complaint;
- c) The substance of the complaint;
- d) The status of the complaint, including whether resolved or not, and whether redress was provided; and
- e) All correspondence in relation to the complaint. Such records must be retained by INOVEST for a period of 5 years from the date of receipt of the complaint.

## 8. Reporting of Complaints

INOVEST must submit to the CBB's Compliance Directorate a quarterly report summarising the following:

- a) The number of complaints received;
- b) The substance of the complaints;
- c) The number of days it took INOVEST to acknowledge and to respond to the complaints; and
- d) The status of the complaint, including whether resolved or not, and whether redress was provided.

The report must be sent electronically to CBB on the following e-mail address: [compliance@cbb.gov.bh](mailto:compliance@cbb.gov.bh). Where no complaints have been received within the quarter, a 'nil' report should be submitted to the CBB's Compliance Directorate.

## 9. Appendix 1: Complaint Form

Complaint Form		نموذج شكوى
Client Information		تفاصيل العميل
Name:		الاسم:
Telephone No.:		رقم الهاتف:
Mobile No.:		رقم الجوال:
E-mail Address:		البريد الإلكتروني:
Address:		عنوان البريد:
Complaints Details		تفاصيل الشكوى
Name		الاسم
Signature		التوقيع
Date		التاريخ