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Complaints Handling Policy

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1 Introduction

Within this document, Pro Global Holdings Ltd and its associated businesses are collectively referred to as the 'Company'. This document gives the company position regarding Regulated Complaints Handling. All complaints made within a country must be notified to the country's Compliance department who will assess if the complaint concerns a regulated activity and will then be subject to this policy. Any that do not will be referred back to the relevant department for resolution.

1.1 Roles & Responsibilities

The "Pro Policy Responsibilities" document, held with Pro Group policies on FORUM, applies to all Group policies. The following table is additional and specific to this policy.

Role	Who	Responsibilities
Policy Owner	Head of Group Assurance	Annual review of the policy Provide assurance to the Group Executive that the policy is observed across the company
Review, Recommend and Adopt	Group Executive	Review and recommend adoption of policies to the Board Ensure informed adherence to policies through review of controls through risk and compliance reporting
Implementation	Country Compliance Officer	Ensure implementation of, and adherence to, this policy within their territory Provide clear guidance documentation to all employees within their territory
Awareness	Line Managers	Ensure staff within their units are well informed

When reading this policy document, reference should also be made to other Group policy documents, particularly the Breach Identification, Conflicts of Interest, Data Protection Suite and the Treating Customers Fairly policies.

1.2 Applicability

The Policy is applicable Group-wide to all directors, employees, temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, the Company or associated persons. It applies wherever you are working, whether it is your usual Pro office or any other Pro location, including remote working from your home or any other location. Consult your country-specific Compliance Framework document for information on national laws, rules or standards or information from a national Regulator that may guide implementation of this policy.

1.2.1 Exclusions

This policy has no exclusions, it is applicable to all company staff as above. Any breach of this policy will constitute a serious disciplinary or contractual matter for the individual concerned and may cause serious damage to the reputation and standing of the Company.

1.3 Definition

“Any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of, a person about the provision of, or failure to provide, a financial service or a redress determination, which alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience.”

For Pro, a complaint is recorded if it matches this definition and is from a client or customer regarding the products or services provided by the company, or the behaviour of any of its employees. To be considered as a regulated complaint and therefore one that must be recorded and reported to the relevant regulatory body, the complaint must allege that the rules and regulations of the country regulator have not been correctly implemented and followed.

Note that each country will have its own set of rules and regulations and so reference should be made to your country implementation documentation.

2 The Policy

The company will treat responsibly all regulatory complaints made by clients and customers and ensure they are all investigated and resolved in a manner that is reasonable and acceptable. Where this cannot be achieved internally, the appropriate external channels will be freely available to the complainant to follow and the company will cooperate fully as required.

Complaints made will be accepted in any format, verbal or written, and in person, over the telephone or by electronic means.

Where the company acts on behalf of a client to handle their regulated activities, there may be a contractual obligation to investigate and respond to complaints. These obligations must be observed fully and reported to the client as required.

All complaint responses must be notified to the country Compliance Officer prior to issue.

2.1 Lloyds of London

Lloyd's of London (Lloyd's) has also adopted the Financial Conduct Authority (UK Regulator authorising the company's activities) complaint rules as the basis of their complaint handling arrangements. A Lloyd's complaint involving a syndicate that is underwritten in the UK should be reported to Group Assurance, as a matter of urgency, who will guide the business about the Lloyd's complaints process and requirements.

2.2 Points to note

Pro services may be provided from a different country to the Client home base and therefore the regulatory requirements in the Clients' home country must be considered where they differ from those applicable to the Pro servicing country.

Pro has a documented complaints procedure which explains how a complainant can make a complaint to Pro – this is available on the Pro-Global website (<https://pro-global.com/complaint-procedure/>). Country specific variations to this procedure must be documented and be available through the country Compliance department.

3 Further Information

3.1 Queries

For queries regarding the Group policy, contact the Head of Group Assurance.

For queries regarding country implementation of this policy, contact the country Compliance Officer.

3.2 Document History

Version No	Description	Date of Exec Approval	Date of Implementation
V1.0	First authorised issue	December 2017	December 2017
V1.1	Annual policy review	January 2019	January 2019
V1.2	Amend footer to new Head Office address	N/R	April 2019
V1.3	Annual policy review	9 th January 2020	January 2020
V1.4	Annual Policy Review	December 2020	December 2020

Note: Minor amendments to this policy may be released as V1.1, 1.2 etc. If there is a major change, complete review or the number of minor amendments becomes too large, the next version must be released e.g. V2.0