

COMPLAINTS HANDLING PROCEDURE

Scope

This document outlines our regulatory requirements under the Insurance Distribution Directive and Markets in Financial Instruments Directive which are transposed in the MFSA's Insurance Distribution Rules and Investment Services Rules and Conduct of Business Rulebook and the processes which Manentia Wealth Consulting Group Limited (the "Company") is to follow in order to meet them.

The purpose of this document is to set out the Company's commitment and procedures for the prompt handling of clients' or potential clients' complaints. The Company is committed to providing quality services to its clients and working in an open and accountable way that builds the trust and respect of all our stakeholders.

For clarifications on the content of this document, please contact the Compliance Officer of the Company by email neal.rossignaud@mwgroup.ch or by phone on +356 2703 9045.

What is a complaint?

A complaint is an expression of dissatisfaction or displeasure made by a client, whether justified or not, whether verbally or written, regarding a product and/or service. All verbalised complaints must be formalized and therefore put in writing. This does not mean that one must not look into verbal complaints. Verbal complaints must also be actioned, however one must explain to the client that although action will be taken on the basis of a conversation, because of the nature of his/her complaint, it would be in the best interests of both parties, to put the complaint down in writing. Thus, a summary shall be completed on behalf of the client and the complainant shall be requested to confirm the summary/declaration prepared.

Each complaint must be investigated impartially and on its own merits.

Suite 11/12, 229 Tower Road, Sliema SLM1601, Malta - Company Registration Number: C 80087

Manentia Wealth Consulting Group Limited is authorised and regulated by the Malta Financial Services Authority.

General Requirements and Important Principles

All complaints whether minor or major shall be acknowledged within 2 business days.

All communication made to the complainant or the client must be made in a language which is easily understood. Use of jargon shall be avoided if this raises more confusion than clarity.

On receipt of a complaint, the Compliance Officer shall ensure that an acknowledgement letter is sent out within 2 business days. This letter shall confirm that:

- i) The Company will investigate the complaint; and
- ii) On completion of the investigation, the Company will write to the client concerning the outcome.

If within 15 working days after receipt of the complaint the investigation has not been completed, the Compliance Officer shall issue a further letter to the client informing him/her accordingly of the anticipated timeframe within which it hopes to resolve the complaint or that the client can refer the matter to the Office of the Arbiter for Financial Services and provides the following contact details:

- Office of the Arbiter for Financial Services
1st Floor
St Calcedonius Square
Floriana FRN 1530
- Malta Freephone: 80072366
- Tel: +356 21249245
- Email: complaint.info@financialarbiter.org.mt
- Website: <http://financialarbiter.org.mt/>

Once the details of the complaint have been investigated a report will be produced to outline the grievance and this will be presented to the members of the Board of Directors. The Board should consider the need to involve the Company's legal advisors in reviewing the Company's written communications with regards to complainants.

In communicating its final decision to the client, the Company shall:

Suite 11/12, 229 Tower Road, Sliema SLM1601, Malta - Company Registration Number: C 80087

Manentia Wealth Consulting Group Limited is authorised and regulated by the Malta Financial Services Authority.

- i) Include a very short description of the complaint, and of the outcome of the Company's investigation.
- ii) Set out the Company's final view on the issues raised in the complaint.
- iii) Include details of any redress that is being offered, if considered appropriate.
- iv) Where the case has not been handled to the client's or potential client's satisfaction, the complainant shall be notified of the option to refer his /her complaint to the Arbiter of Financial Services.

If a complaint is lodged with the Arbiter for Financial Services, the parties will be encouraged to resolve the case by mediation. However, participation in the mediation is voluntary. If the mediation has not been successful or has been refused, the Arbiter – who may be assisted by an investigator will start an investigation. The Company and the complainant will be given the opportunity to make written submissions with respect to the complaint.

The Arbiter is required to proceed with adjudication of a complaint within 90 days from the date when a complaint is submitted, which period may be extended to up to one year when cases are complex. However, decisions reached by the Arbiter may be subject to an appeal by either party to the complaint. When no appeal is made by either party within 20 days from the date when the Arbiter notifies the parties of his decision, the decision becomes final and binding on all parties.

The role of the Arbiter

The Office of the Arbiter for Financial Services is a body set up in terms of Arbitration for Financial Services Act, 2016 with power to mediate, investigate and adjudicate complaints filed by customers against all financial services providers. The Arbiter, and the whole setup of the Office, is totally independent and impartial of all parties concerned to the complaint.

The following customers may lodge a complaint with the Arbiter:

- ✓ Natural persons – including their successors in title; and
- ✓ Micro-enterprises – that is, sole traders, companies, partnerships, and cooperatives which employ fewer than 10 persons and whose annual turnover and/or annual balance sheet total does not exceed €2,000,000.

Suite 11/12, 229 Tower Road, Sliema SLM1601, Malta - Company Registration Number: C 80087

Manentia Wealth Consulting Group Limited is authorised and regulated by the Malta Financial Services Authority.

The Arbiter has the remit to investigate complaints against all financial services providers licensed by the MFSA, whether still holding a licence or not.

Legal Action against the Company

Any legal actions received against the Company shall be forwarded to the Board of Directors, copying the Compliance Officer. Depending the gravity of the case, a meeting shall be conveyed to discuss the course of action. The Compliance Officer shall review the case and present any conclusions to the Board of Directors. The legal representative shall be requested to attend such meeting. In all cases, the correspondence received from the clients' legal representative shall be forwarded to the Company's legal representatives.

Complaints in relation to data protection

In line with GDPR, data subjects (e.g., clients, employees, and other individuals) have the right to complain to the Office of the Information and Data Protection Commissioner or any other supervisory authority of his habitual residence, place of work or place of alleged infringement and the right to an effective judicial remedy.

Data subjects are notified of such rights in the Privacy Policy Notice provided to them.

Any complaints received shall be immediately forwarded to the appointed Data Protection Representative and shall be handled under his responsibility. An update on complaints received by the Company, including the manner in which they are being handled, are to be provided to the Board of Directors and Compliance Officer by the Data Protection Representative.

Important Information

Complaints Address:
The Compliance Officer,
MWC Group Ltd, Suite 11/12,
229 Tower Road
Sliema, SLM1601

Contact Details:
Telephone: +356 270309045
Email: neal.rossignaud@mwccgroup.ch

Suite 11/12, 229 Tower Road, Sliema SLM1601, Malta - Company Registration Number: C 80087

Manentia Wealth Consulting Group Limited is authorised and regulated by the Malta Financial Services Authority.