



Lesha Bank LLC (Public)

Complaints Handling Policy & Procedures

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Abbreviations & Definition

Bank:	Leshabank LLC (Public) and its domestic and foreign subsidiaries, partnerships, ventures and other business associations that are effectively controlled by the Bank directly or indirectly.
Board:	the Bank's Board of Directors
QFCRA:	Qatar Financial Centre Regulatory Authority
QFC:	Qatar Financial Center
HR:	Human Resources Department
Senior Management:	Includes the functions of CEO/DCEO and any Employees of the Bank reporting directly to the CEO.
CIPR 2019:	QFCRA 's Rules Customer and Investor Protection Rules 2019.
Complaint:	Means an expression of grievance or dissatisfaction, by a Complainant (other than an eligible counterparty), either orally or in a durable medium, in connection with the Bank's provision (or offer of the provision) of its product or service, if the provision of the product or service was or would be a regulated activity.
Complainant	Means natural or legal person who is a customer and presumed to be eligible to have a Complaint and who has already lodged a Complaint, who may include, if applicable: (a) an individual who is a surviving dependent of a deceased retail customer of the Bank, if any, (b) a legal personal representative of a deceased retail customer of the Bank, if any, (c) a widow or widower of a deceased retail customer of the Bank, if any.

1. Introduction

It is the Bank's policy to have good and transparent relationships with its customer and to respond to customer complaints, disputes, and issues swiftly and to take each complaint seriously.

The Bank, therefore, attaches great value to being well informed on possible sources of Complaints, and to get in contact with any dissatisfied customer so that suitable solutions can be found, and products, activities and services can be improved.

This is in line with the Bank's principles of fair treatment of its customers and its commitment to correct any errors, and deal with Complaints, promptly, consistently, efficiently, and fairly.

This policy describes the procedures and measures that the Bank takes to ensure that an effective and transparent measurements and related procedures for the prompt handling of Complaints are in place. It provides clear, accurate and up-to-date guidelines in respect of the Complaints handling process in accordance with CIPR 2019.

The Board has delegated the responsibility of monitoring and responding to complaints to the Senior Management of the Bank.

2. Scope & Purpose of the Policy

- 2.1.** This Policy gathers the essential rules, appropriate operational and effective internal procedures, which are expected from the Bank to have in place for handling Complaints and to ensure that Complaints, however made, in relation to its conduct of regulated activities are dealt with fairly, efficiently, and with due diligence and consideration.

3. Measures

- 3.1.** In order to ensure that effective and transparent Complaints management processes and procedures are in place for the prompt handling of Complaints, the measures set out below must be taken by all Employees.
- 3.2.** These measures are mandatory but may be implemented in combination with other policy manuals and procedures, such as Client Dealing Manual, Private Banking Policy and Compliance Policy, and may also be incorporated into other policies.

4. Complaints Resolution Management (CRM):

- 4.1.** Complaints Resolution Management (CRM) responsible for the investigation of Complaints is in place, which enables Complaints to be investigated fairly and possible conflicts of interest to be identified and mitigated. The Compliance Department, Private Banking, and Corporate Service Departments are appointed as the CRM. This function may either be carried out by one of these Departments or combined with another department in cooperation with Compliance Department.
- 4.2.** Each Department of the Bank must have one central, clearly communicated and easily accessible point of contact where Complaints can be filed and reported to the CRM.
- 4.3.** The point of contact must be carefully record and report the Complaints with the collected data in order to recognize any important patterns and take action where necessary.

5. General Principles for Complaints' handling:

5.1. Generally, a complaint will be about how an Employee, or the Bank solicited, advised on, executed or settled a transaction. It is also likely to involve a demand from the client, either expressly or impliedly, for a payment or other adjustment to their account or transaction. Complaints may also include (but not limited to) the following:

- Any allegation that the Bank acted outside the terms of a relevant client/ client agreement (if any).
- Any matter which involves, or is alleged by the complainant to involve, a breach of any statutory or regulatory requirement(s).
- Any allegation concerning malpractice, impropriety, or any other matter which could result in financial loss to the client.

5.2. A complaint by a client can be in writing or verbal. Generally, a verbal "complaint" or a remark from a client may not necessarily be a complaint but a mere discontentment. The Employee must determine if the "tone" of the remark whether the client is expecting a response from the Bank.

5.3. If it sounded "serious", the Employee should record brief details of the conversation, including the date and time of the conversation and the nature of the complaint and, if possible, record the actual words used.

5.4. For legal reasons, the Employee should not:

- Make notes on the original documents.

- Admit liability in any way.
 - Discuss the complaint with any person representing the client/counterparty, e.g. their lawyer or adviser.
- 5.5.** Care should also be taken in the preparation of internal notes and electronic mail messages as such documents may be discoverable in the event of legal proceedings.
- 5.6.** Under no circumstance shall a Complaint be treated lightly. A Complaint that is mishandled may also result in the client escalating the Complaint to the Regulator.
- 5.7.** Complaints shall be handled in a timely and appropriate manner.
- 5.8.** The following information shall be obtained from the customer:
- 5.8.1. Nature of complaint, including how and when it happened;
 - 5.8.2. Anything specific that the customer wants the Bank to do to make things right;
 - 5.8.3. Customer's name, address and contact phone number;
 - 5.8.4. Customer's account details; and
 - 5.8.5. Other details, such as policy or letter reference numbers.

6. Internal Complaint Handling Procedures:

6.1. The internal Complaint-handling procedures within the Bank provide for the following:

- Receiving Complaints.
- Acknowledge Complaints.
- Responding to Complaints.
- Meeting any service standards in relation to Complaints.
- Referring Complaints to other authorized firms.
- Investigation of Complaints by a member of CRM, who has sufficient competence who was not directly involved in the subject of the complaint.
- A member of CRM, who is responsible for responding to a Complaint, shall have the authority to settle the Complaint (including offering redress if appropriate) or having ready access to someone who has the necessary authority.
- The CRM shall inform the Complainants in writing about their right to go to the client dispute resolution scheme if relevant.
- Respond to customer with the outcome of the investigation.
- Close out of Complaints.

6.1.1. Additionally, the Complaint-handling procedures shall be published on the Bank's websites and as per QFCRA regulators:

- All internal Complaint-handling procedures shall be published to all employees and a copy of the published details given to a Customer, on request.
- An employee who receives a Complaint from a Customer (unless the Complaint is resolved by close of business on the next business day) will provide the Customer automatically with a copy of the Complaint handling procedures.
- the Bank will clearly display in its Office a notice indicating that it is covered by the Client Dispute Resolution Scheme.
- the customer has the right to access the Customer Dispute Resolution Scheme which is maintained by the QFCRA if not satisfied with how the complaint was dealt with and wants to take it further.

6.2. Complaints Register:

6.2.1. Each Business Unit shall have a copy of the Complaint Form which shall be submitted to the Compliance department. The complaint form must at least clearly indicate the following:

- Nature of the Complaint
- Name of the Complainant
- Name of the individual who investigated the Complaint
- Any correspondence in relation to the Complaint
- Date of Complaint
- Complaint Receipt Confirmation
- Action Taken
- Complaint Closed Date

The Compliance department will keep a record of the Complaints register.

6.3. Receiving Complaints:

6.3.1. Customers may raise a complaint in person at the Bank, via the Call Centre (+974 4448 3333), via email (complaints@leshabank.com) or via letter/mail.

6.3.2. When an Employee receives a written or "serious" verbal complaint, he/she must immediately send it to the CRM.

6.3.3. The CRM will analyze the situation. If it can be resolved easily, the Employee involved will immediately respond to the Complainant (in consultation with the CRM) by close of business on the next business day after the day on which the Complaint was received. Such complaints shall be recorded in the Customer/Shareholder Complaints Log. In case recurrence of the same complaint identified, it shall be considered as NC and shall be recorded in NC & Corrective Action Report (LB-IMS-M-FRM-08) and follow all the necessary actions stated in Non-Conformance & Corrective Actions Procedure (LB-IMS-M-03) until the closure of NC.

- 6.3.4. If the Complaint cannot be solved on the next business day, the CRM or the Employee (depending on the situation) shall send an acknowledgement letter to the Complainant within 5 business days to acknowledge receipt of the Complaint and that the Bank will endeavor to address the situation and provide the final response within 30 days - see sample letter in Appendix 1. NC and shall be recorded in NC & Corrective Action Report (LB-IMS-M-FRM-08) and follow all the necessary actions stated in Non-Conformance & Corrective Actions Procedure (LB-IMS-M-03) until the closure of NC
- 6.3.5. The acknowledgement must:
- a- give the name and job title of the individual who is handling the Complaint for the Bank; and
 - b- give details of the Bank's internal complaint-handling procedures.
- 6.3.6. The acknowledgement may be combined with a final response if the Bank can provide the response within 5 business days after the day the Complaint is received.
- 6.3.7. In any conversation with a Complainant, the Employee should take care to remain polite and to avoid making any comments which could damage or be detrimental to the Bank's position in case of any ensuing dispute. The Head of Compliance shall report all complaints to Senior Management during the management review meeting as an input.

6.4. Investigating Complaints:

- 6.4.1. No Employee shall investigate a Complaint that has direct or indirect implication to him or herself.
- 6.4.2. For every registered complaint, a root cause analysis shall be performed and a corrective action plan shall be developed. The details of action & closure shall be recorded in the NC & Corrective Action Report (LB-IMS-M-FRM-08).
- 6.4.3. Any Complaint that is material and has resulted in a breach of regulations or internal policy will be investigated or resolved by the Head of Compliance in consultation with the Senior Management.
- 6.4.4. If it has an impact on the Bank's reputation, internal or external legal counsel must also be consulted.
- 6.4.5. The Employee must disclose all facts, produce the necessary documents and cooperate with the Compliance Department and the CRM.
- 6.4.6. Every Complaint must be investigated, resolved, and respond promptly.
- 6.4.7. As a general guide, depending on the seriousness of each complaint, it must be investigated and responded to the Complainant in accordance with this Policy.
- 6.4.8. On a very exceptional basis, if an investigation cannot be completed within 30 days, the Head of Compliance shall send an apology letter to the complainant with

- (a) reasons of the delay and to ask for an extension of time (which should not exceed 30 days).
- (b) if the Complainant is eligible to apply under the Customer Dispute Resolution Scheme, informs the Complainant that the Complainant may apply under that scheme if dissatisfied with the delay.

6.4.9. Until the Complaint is resolved, all communications with the Customer in respect of the Complaint must be referred to the Head of Compliance and the CRM.

6.4.10. During the investigation, full cooperation is required from all employees, including the production of any relevant documents that may support the case.

6.5. Responding to Complaints and Services Standards:

6.5.1. This policy applies if a complaint has not been resolved by close of business on the next business day after the day on which it is received,

6.5.2. If the Bank has referred part of the complaint to another authorized firm, the Bank must comply with this policy in relation to the part of the complaint that was not referred.

6.5.3. Within 5 business days after the day on which the complaint is received, the Bank must give the complainant an acknowledgement in a durable medium. The acknowledgement:

- Must be approved by the Senior Management and Head of Compliance,
- Must give the name and job title of the individual who is handling the complaint for the Bank; and
- Must give details of the Bank -handling procedures.

6.5.4. The acknowledgement may be combined with a final response if the Bank can provide the response within 5 business days after the day the complaint is received.

6.5.5. A final response is to be approved by the Senior Management and Head of Compliance, and must:

- Must be in a durable medium,
- Must do one of the following:
 - Accept the Complaint and, if appropriate, offer redress,
 - Offer redress without accepting the Complaint,
 - Reject the complaint and give reasons for rejecting it; and
 - If the complainant is eligible to apply under the customer dispute resolution scheme:
 - (a) Must inform the complainant that, if the complainant is dissatisfied with the response, the complainant may apply under that scheme, but must do so within 4 calendar months after receiving the response; and
 - (b) Must give the contact details for the scheme.

- 6.5.6. If the Bank has not given the Complainant a final response at the end of 4 weeks after the day on which the complaint is received, the Bank must give the Complainant a response as instructed by the CRM or Head of Compliance, in a durable medium, explaining why it has not been able to resolve the Complaint and indicating when it will contact the Complainant again about the Complaint.
- 6.5.7. If the Bank has not given the Complainant a final response at the end of 8 weeks after the day on which the Complaint is received, the Bank must give the Complainant a response as instructed by the Senior Management or Head of Compliance, in a durable medium, that:
- Explains that the Bank has not been able to give a final response, gives reasons for the further delay and indicates when the Bank expects to give a final response; and
 - If the Complainant is eligible to apply under the Customer Dispute Resolution Scheme, informs the Complainant that the Complainant may apply under that scheme if dissatisfied with the delay.
- 6.5.8. If the Bank received the Complaint on a day that is not a business day, or on a business day after close of business, the Complaint is taken to have been received by the Bank on the next business day.
- 6.5.9. A reference number shall be assigned to each complaint and documented in Customer/ Shareholder Complaints Log. Customers can quote this number when making a follow-up.

6.6. Close-out

- 6.6.1. Once the customer accepts the complaint resolution as a conclusion of the root cause analysis, the complaint shall be closed out and the same shall be recorded in NC & Corrective Action Report (LB-IMS-M-FRM-08).
- 6.6.2. The status of the complaint (NC) shall be recorded in the Customer/ Shareholder Complaints Log.
- 6.6.3. The status of complaints (i.e., number of complaints received, number of complaints closed within proposed timelines etc., results of complaints analysis) shall be reviewed in the Management Review meetings.

6.7. Analysis of Complaints for Systemic Weaknesses:

- 6.7.1. The CRM must regularly (at least annually) undertake an appropriate analysis of the patterns of Complaints, including investigating whether the Complaints indicate an isolated issue or a more widespread issue for customers.

6.7.2. The results of the analysis must be submitted to the Senior Management and the ARCC. Head of Compliance shall report the results of the analysis to the top management during the management review meeting.

6.7.3. The CRM must also analyze Complaints that it receives against intermediaries (whether in the QFC or in another jurisdiction) in relation to products that the intermediaries have distributed on the behalf the Bank, to enable the Bank to assess the complete customer experience and identify any issues that need to be addressed.

6.8. Referring Complaints to Other Firms

6.8.1. If the Bank is satisfied on reasonable grounds that another authorized firm within QFC may be solely, jointly or partly responsible for the act or omission alleged in a complaint made by a customer, it may refer all or part of the complaint to the other firm. Senior Management should decide whether or not such complaints should be referred to another firm.

6.8.2. When referring complaints, the following guidelines should be followed:

6.8.2.1. Make any referral to the other authorized firm promptly, but no later than five (5) business days after the day it became satisfied that the other authorized firm may be solely, jointly or partly responsible for the act or omission the subject of the complaint.

6.8.2.2. Make a referral using a durable medium.

6.8.2.3. Inform the complainant in writing, in the final response or otherwise, about the referral and the other firm's contact details; and

6.8.2.4. Unless it is satisfied that the other firm may be solely responsible for the act or omission the subject of the complaint, continue to comply with the requirements of the Bank Complaint Handling procedures in relation to the complaint.

6.8.2.5. If the Bank receives a complaint referred to by another authorized firm, the complaint is regarded to have been made directly to the Bank by the customer; and to have been received by it when the referral was received

6.9. Quarterly Reporting about Complaints:

6.9.1. the Compliance Department in coordination with member of CRM and Business Units, must make a quarterly register of complaints and report to the QFCRA about Complaints.

6.9.2. The report must be in the format directed by the QFCRA by notice from time to time.

7. Records:

The following records are maintained through this procedure:

- Customer/ Shareholder Complaints Log LB-IMS-M-FRM-08
- NC & Corrective Actions Report: LB-IMS-M-FRM-08

Appendix 1 - Client Complaint Acknowledgement Letter

Date:

Reference Number: [#]

[Client Name]

[Client Address]

Dear _____

Thank you for your [*letter / fax / email*] dated _____ expressing your comments to our products and services.

At Lesha Bank, our client's satisfaction always comes first and lies at the core of our business and client servicing philosophy. As such, we appreciate your sharing your feedback with us and for allowing us the opportunity to address it immediately.

We have already discussed the matter you raised with our Head of Compliance who will be investigating into the situation, and we shall keep you apprised of the outcome as soon as possible.

Once again, we wish to thank you for your continued support to Lesha Bank, and we wish to reiterate our commitment to continually improve our service quality and standards to our valued clients like yourself. You are most welcome to channel your feedback to us at any time through letter, telephone, fax, email or in person.

Please do not hesitate to contact us should you have further queries on the above, or if we can be of service to you in any other ways.