Penco Capital Wealth Advisory Limited

Complaints Handling Procedure

Version:	Date:	Prepared by:	Approved By:	Next Review by:
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1. Introduction

Penco Capital Wealth Advisory Limited trading as Penco, Which Mortgage ('the Company') is authorised by the Central Bank of Ireland as an Investment Intermediary under the Investment Intermediaries Act, 1995; is registered as an Insurance Intermediary under the European Union (Insurance Distribution) Regulations, 2018; and is authorised under Regulation 30 of the European Union (Consumer Mortgage Credit Agreements) Regulations, 2016 to engage in the business of being a Mortgage Intermediary. As such, the Company is a regulated entity that undertakes regulated activities.

In terms of Chapter 10 of the Consumer Protection Code 2012 ('the Code'), the Company must have in place a written procedure for the proper handling of complaints. The procedures set out herein provide guidelines to the implementation of best practice in handling of complaints to the satisfaction of the Code, and apply to all employees of the Company whose roles entail directly dealing with customers of the Company.

The Company aims to provide the best possible service to its customers at all times, however, in the event that a customer is dissatisfied with the service provided and makes a complaint, it is the policy of the Company to:

a) Respond to such complaint in a courteous, timely and fair manner.

b) Endeavour to address the specific issues raised by the customer and, where appropriate, update our procedures to avoid re-occurrence of the issues.

c) Endeavour to achieve a situation where our customer feels we have adequately addressed the complaint.

2. Responsible Persons

The Company's Compliance Function is responsible for overseeing the implementation of these procedures throughout the Company and for developing related guidelines or training, if applicable.

3. Complaints Handling Procedure

Where a customer ('complainant') of the Company has made a complaint and the complaint has been resolved to the complainant's satisfaction within five business days of lodging the complaint, the procedure below need not be applied. A record of the resolved complaint must, however, be kept.

The Company adopts the following procedure in respect of complaints by our customers:

a) The Company will establish and maintain a complaints file and all complaints records will be retained for a period of six years.

b) Where the Company receives an oral complaint, we will offer the complainant the opportunity to have the complaint treated as a written complaint.

c) The Company will provide the complainant with the details of the Compliance Function (i.e. Compliance@penco.ie) who will be the complainant's point of contact in relation to the compliant until it is resolved or cannot be progressed any further.

d) The Company will investigate the complaint on the basis of our understanding of the issue.

e) The Company will acknowledge, in writing, each complaint within 5 business days of receipt.

f) The Company shall investigate the complaint as swiftly as possible, and the complainant will receive an update on the complaint in intervals of not greater than 20 days starting from the date on which the complaint is made.

g) The Company will endeavour to investigate and resolve the complaint within 40 business days of having received the complaint. Where the 40 business days have lapsed and the complaint is not resolved, the complainant will be informed of the anticipated timeframe within which the Company aims to resolve the complaint.

h) Within 5 business days of the completion of the Company's investigation of the complaint, the Company shall furnish the complainant with a written report indicating:

    1. The outcome of the investigation;
    2. Where applicable, the terms of any offer or settlement being made;
    3. That the complainant can refer the matter to the Financial Services and Pensions Ombudsman ('FSPO'); and
    4. The contact details of the FSPO.

i) Where it appears to the Company that the complainant is not satisfied with the outcome of the investigation, and where the Company is of the view that it cannot progress the issue further, the Company will immediately write to the complainant advising them of their right to refer the dispute to the FSPO.

j) The head of the department in which the complaint arose and the Compliance Function will review the file before its conclusion and endeavour to identify any procedures that can be implemented by the Company to avoid a repeat of the type of complaint received. Any new procedures will be immediately communicated to all employees and added to this Complaints Handling Procedure.

4. Complaints Log

The Company shall maintain an up-to-date log of all complaints from customers (**Appendix A**). The complaints log must contain the following information:

a) Details of each complaint;
b) The date the complaint was received;
c) A summary of the Company's response(s), including dates;
d) Details of any other relevant correspondence or records;
e) The action taken to resolve each complaint;
f) Confirmation that the 5 day acknowledgement letter was sent to the complainant;
g) Confirmation of 20 day update letter to the complainant;
h) Confirmation of sending 40 day final response letter to the complainant;
i) The date the complaint was resolved; and
j) Where relevant, the current status of the complaint which has been referred to the FSPO.

5. Review

This procedures document will be reviewed from time to time to ensure it is appropriate and at least every 2 years.

Appendix A

PENCO INSURANCES LIMITED
COMPLAINTS LOG

Penco Insurances Limited must endeavour to investigate and resolve a complaint within 40 business days of having received the complaint.

No.	Client ref.	Details of Complaint								
		Date received	Details of complaint	Summary of responses given and dates updates were issued	Action taken to resolve complaint	5 day Acknowledgement Letter	20 day Update Letter	40 day Final Response Letter	Date Complaint was resolved	Status of complaint referred to Ombudsman