

RIVERSIDE TRUSTEES LIMITED COMPLAINTS POLICY

HOW TO FILE A COMPLAINT

Riverside Trustees Ltd (“RTL”) is committed to provide the best service to our customers.

A complaint is defined as a justified oral or written expression of dissatisfaction, on behalf of, a person about the provision of, or failure to provide, a service that relates to trust company business carried on by RTL, which alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience.

To file a complaint, clients of RTL should be provided with the form below to inform us by email compliance@riversidetrustees.sg, or write to us at:

Riverside Trustees Limited, One North Bridge Road, #06-12, High Street Centre, Singapore 179094. Attn: Compliance Department.

All client complaints must be acknowledged within 3 working days and clients are to be updated on any findings OR any delays with a view for resolution within a reasonable timeframe. We reserve the right to request for more information to aid in investigations.

COMPLAINTS FORM

Complainant Name: (Underline Last Name)	
Date of Complaint:	
Delivery Method of Complaint	By Email / Phone / Letter:
Client email & Handphone Nos.	Email HP Nos
Client Ref Code	
Associated Trust or other entity of Complainant	
Summary of Complaint	
Supporting documentation and any other relevant documents (please attach):	
Signed by Complainant Date	

RIVERSIDE TRUSTEES LIMITED

COMPLAINTS POLICY

1. Definition

1.1. A complaint is:

an 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 service that relates to trust company business carried on by RTL, which alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience.

2. Eligible Complainants

- 2.1. In order for a complaint to be treated as a formal complaint under this policy, it must be made by a person who is considered “eligible” by virtue of being a customer, former customer, prospective customer or other person to whom a fiduciary or contractual obligation is owed by RTL.
- 2.2. Other service providers, lawyers, agents, or appointees (unless expressly making the complaint on behalf of an eligible complainant as defined above) who have not directly suffered material loss, distress or inconvenience, will not be considered to be eligible complainants for the purpose of this policy, but must still be handled appropriately, professionally and with due regard to RTL’s reputation.

3. Fee Complaints

- 3.1. Complaints about fees will only be considered as formal complaints for the purpose of this policy if they allege any of the following:
 - 3.1.1. The level of fees charged was not in accordance with the service agreement (or otherwise as agreed between the complainant and RTL) and/or Terms of Business;
 - 3.1.2. Fees have been charged for services that have not been agreed;
 - 3.1.3. Fees have been charged for services provided inadequately or not at all.
- 3.2. Complaints regarding the level of fees charged, but which were otherwise allowed for in the service agreement, will not be regarded as formal complaints.

4. Clarification of Potential Complaints

- 4.1. Occasionally RTL will receive a communication where some dissatisfaction is being expressed, but where the matter being complained about isn’t clearly specified or where it is not clear that the individual wishes to make a complaint.

- 4.2. In such circumstances the individual will be replied to and given the option of making a formal complaint, and if so to clarify the matter being complained about. Should that individual decline to make a formal complaint then the steps detailed in this policy need not be followed, although due consideration will still be given to addressing the matters raised by the individual.

5. Oversight of Handling Complaints

- 5.1. Any complaint received will be handled fairly, impartially, and promptly by Senior Management i.e. RTL Client Director and Compliance Officer. Any attempt by an employee to hide or interfere with a complaint in any way will result in disciplinary action.
- 5.2. Complaints will be independently reviewed and a Client Director will decide who the appropriate person is to investigate the complaint. Any complaint that names an employee as a subject or cause of a complaint will not be investigated by that employee.
- 5.3. Any time spent on investigatory work and communication in relation to a complaint will not be charged where time charges are applicable.
- 5.4. The complainant will be kept informed of the progress of their complaint, including where investigations may be delayed due to the need to obtain additional information, and with details of any actions proposed to resolve their complaint.
- 5.5. Any decisions made following an investigation, whether that decision is to propose a remedy, provide compensation or otherwise to not uphold the complaint, will be communicated to the complainant in a clear and professional manner. Where a complaint is not upheld the reasons for that decision will be fully explained to the complainant.

6. Resolution of Complaints

- 6.1. A complaint will be considered to be resolved when:
- 6.1.1. the complainant confirms that the decision made by RTL is satisfactory;
 - 6.1.2. the complainant withdraws the complaint during the investigation period;
 - 6.1.3. where a complaint is not upheld, no further response is received from the complainant after a period of thirty days following the communication of that decision.
- 6.2. Where a complaint is not upheld but the complainant has communicated that they are not satisfied with the decision, the complainant will be advised of their right to take legal advice and seek redress through the courts, and the complaint will be considered to be unresolved for the purpose of this Policy.

7. Monitoring & Managing Complaints

- 7.1. Any complaint received will be notified to Compliance as soon as possible. Copies of all communications with the complainant specifically relating to the complaint will be provided to Compliance.

- 7.2. Compliance will maintain a Register of Complaints to contain details of all complaints received, correspondence received, the conclusion of the investigations and decisions made, and a record of any agreed compensation or compromise.
- 7.3. if the complaint is rejected due to valid reasons, this rejected case should also be recorded in the Complaints Register.
- 7.4. Compliance will report complaint statistics and progress on resolved & unresolved complaints and corresponding reasons to the Board.

COMPLAINTS PROCEDURES

- 1. Complainant to use written complaint form sent to compliance@riversidetrustees.sg which will be copied by the Compliance Officer to the relevant Client Director.
 - 1.1. The relevant Client Director should send an acknowledgement receipt of the complaint to complainant within 3 working days specifying that RTL is aware of the complaint and will be conducting investigations and provide an update within 30 days with a view to resolve the problem.
- 2. If RTL needs more information or more time for investigation, we will update the complainant and request for more time to investigate further.
- 3. The relevant Client Director and Compliance Officer will decide who should investigate the complaint, considering any potential conflict of interest the investigator may have if they are involved in the subject matter of the complaint.
- 4. The Compliance Officer may discuss progress and findings with the Client Director. On conclusion of the investigation the findings must be presented to the Client Director who will decide the appropriate course of action required to resolve or reject the complaint and any compensation or other financial offer that may need to be made.
- 5. The response must be in writing and must detail any action being taken to resolve the complaint and, if the complaint is not upheld, it must clearly state the reasons for its rejection. Such complaints are to be written in the Complaint Register with evidence to specify complaint is rejected, resolved or unresolved with corresponding reasons and compensations.
- 6. The response should be sent by a Client Director and should include a paragraph to the effect that if RTL does not receive an acceptance of their decision on the complaint and any compensation offered within thirty days, RTL will consider the complaint closed. A copy of the response must be provided to Compliance to be registered in Complaints Register.
- 7. Should a complainant not be satisfied with the decision the complainant must be advised of their right to take legal advice and seek redress through the courts, and the complaint will be considered to be unresolved.
- 8. Progress reports must be made as required, but no more than one month apart. Every effort must be made to resolve the complaint within three months of receipt.

9. Compliance must be provided with updates and copies of any ongoing communications that discuss the complaint or subsequent investigation as it takes place.

COMPLIANCE

1. On receipt of a Complaint Notification Form Compliance will:
 - 1.1. log the complaint in the complaints Register;
 - 1.2. consider if a PII notification is required;
 - 1.3. consider if a notification to the MAS is required should a pattern of complaints be identified.
2. Compliance will add details of subsequent communications relating to the complaint as well as any reported progress or reasons for delays in progress to the relevant record in the complaints register;
3. Should a complaint not be resolved within three months of date of receipt, Compliance will consider its regulatory obligations to MAS in terms of notification of the Complaint and any progress made to date.