



# Citco Custody Limited Complaints Procedure

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**CITCO**

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## 1. Introduction

This document details Citco Custody Limited's ("CCL") policy on how the entity will deal with any complaints raised by clients in relation to the service that CCL provides to them. Although CCL's client base does not include retail clients, the requirements issued by the MFSA under R1-2.3.1 of the Investment Services Rules for Investment Services Providers, Part B1: Rules Applicable to Investment Services Licence Holders which qualify as MiFID Firms, and Appendix 16 (Complaints Handling) have been adopted to ensure effective and transparent procedures for the reasonable and prompt handling of complaints received from clients are established, implemented and maintained.

This procedure should be used by you, if you are a client of CCL. It clearly details the processes and timescales that we will follow to ensure that complaints are handled in a timely, thorough and fair manner.

## 2. How to make a complaint

Complaints and expressions of dissatisfaction can be highlighted to us in a variety of ways either in writing (letter, e-mail) or via a phone call.

Your complaint should be made to your relevant client relationship manager who ordinarily would co-ordinate your complaint response. However if it is more appropriate, a complaint can also be made to their line manager or the Malta Compliance team.

## 3. How we will handle your complaint

Complaints will ordinarily be co-ordinated by the relevant client relationship manager, or if required by an independent client relationship manager who has not been involved in the issues that you have complained about.

All complaints should within one working day of the receipt be reported to relevant senior management and also Group Compliance.

We will acknowledge your complaint within three business days<sup>1</sup>. This communication to you will include a summary of what we have interpreted the cause of the complaint to be and the name of the person dealing with the complaint. Where possible this communication may also provide details of how we have addressed and closed off the complaint and that we consider the issue to be resolved.

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<sup>1</sup> MFSA Investment Services Rules for Investment Services Providers Part B Standard Licence Conditions - Appendix 16 [2.07(a)]

If we are unable to investigate and address the complaint within these three days we will confirm that we need to undertake a more detail complaint analysis. In these cases a substantive final written response following a full investigation will be sent to you within 8 weeks<sup>2</sup>. If our investigation is still not completed within 8 weeks, we will inform you of this fact within 7 business days<sup>3</sup> from the end of the 8 week period and provide further information about the causes of delay and an indication of the predicted completion date. All correspondence to you will have been agreed by compliance and the investigating manager prior to issue.

Our response will also include a notification to you that you have the right not to accept the outcomes of our review if you believe that we have not investigated the case appropriately. You should notify us in writing within 8 weeks that you do not accept the outcome. We will deem the complaint case to be settled in 8 weeks if no written reply to the contrary is received from you.

If at any time you are not satisfied with the progress of the investigation, or when providing a final decision that does not fully satisfy your demands, the matter may be referred by yourselves to the Arbiter for Financial Services by visiting the website; <https://financialarbiter.org.mt/en/Pages/Home.aspx>.

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<sup>2</sup> MFSA Investment Services Rules for Investment Services Providers Part B Standard Licence Conditions - Appendix 16 [2.07(a-iii)]

<sup>3</sup> Ibid