



B2B Prime Services MENA limited

COMPLIANTS HANDLING PROCEDURES
(Summary Website)

REGISTER OF AMENDMENTS

Amendment No.	Date of Amendment	Section Amended	Amendment Description
1	Version Website	-	Version for Website

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1 COMPLAINTS HANDLING PROCEDURES MANUAL

1.1 Introduction to Complaints Handling

1.1.1 Complaints handling (dispute resolution) is an essential business practice that shows a Firm's commitment to being consistent, fair, and impartial when handling client's complaints. As a general statement, complaints are a feedback mechanism that provides the business with the opportunity to learn and improve its operations.

1.1.2 This Policy describes the mechanisms within B2B Prime Services MENA Limited ("the Firm") in relation to Complaints handling. This Policy is relevant to the size and nature of the financial services business conducted by the Firm and is approved by the Board of Directors.

1.1.3 The Compliance Officer will oversee the implementation of the Policy. This Policy will be reviewed at least annually.

1.2 Purpose

1.2.1 The Firm requires a Complaints Policy to provide a standardized process for handling, recording, and reporting client complaints, ensuring transparency and consistency. This Policy establishes a systematic approach to reviewing complaints both to enhance client service and satisfaction, and to improve overall business processes by identifying potential issues before they become systemic or reportable, thereby ensuring clients receive the best possible service and a clear, fair resolution process.

1.3 General Principles

1.3.1 All client complaints are handled promptly, seriously, and professionally. Complaints may be written or verbal and must be properly recorded. Staff must not admit liability, alter original documents, or discuss the matter with third parties. Mishandling a complaint may lead to escalation to the Regulator.

2 INTERNAL COMPLAINTS PROCEDURE RULES

2.1 Internal Complaints Procedures

2.1.1 The internal complaint-handling procedures within the Firm provide for the following:

- (a) Receiving complaints.
- (b) Responding to complaints.
- (c) Meeting any service standards in relation to complaints.
- (d) Referring complaints to other regulated financial institutions.
- (e) Investigation of complaints by a person of sufficient competence who was not directly involved in the subject of the complaint.
- (f) The person responsible for responding to a complaint has the authority to settle the complaint (including offering redress if appropriate) or has ready access to someone who has the necessary authority.

2.2 Receiving Complaints

2.2.1 When a complaint is received, the Firm acknowledges it promptly, reassures the client, and commits to providing either a resolution or an estimated timeframe within 24 hours. The matter is then documented and referred to the Compliance Officer.

2.2.2 The Compliance Officer records the complaint, informs Senior Management, and ensures appropriate actions and deadlines are set. Depending on the seriousness, complaints may be resolved quickly or may require further investigation, with an acknowledgement sent within 7 working days and resolution targeted within 60 days. Clients are kept informed throughout the process.

2.3 Investigating Complaints

2.3.1 Employees cannot investigate complaints that directly or indirectly affect them. Significant complaints that involve breaches of regulations or internal policy will be handled by the Compliance Officer in consultation with the relevant employee. If the matter impacts the Firm's reputation, legal counsel must be consulted and, where applicable, the Regulator will be notified.

2.3.2 During the investigation, employees are required to disclose all relevant facts, provide necessary documentation, and fully cooperate with the Compliance Department.

2.4 Settlement of Complaints

2.4.1 All complaints are investigated, and clients are informed of the outcome as soon as possible. If the Firm is at fault, it will issue an apology, correct the situation, and reimburse where appropriate. A final response, approved by the Senior Executive Officer and Compliance Officer, will always be provided in writing.

2.4.2 This response may accept or reject the complaint, or offer redress. If the client is not satisfied, the Firm will inform them of other available avenues such as external dispute resolution, arbitration, or the DIFC Court. If no reply is received within ten working days of the written response, the Firm may consider the complaint settled and resolved.

2.5 Client Redress

2.5.1 This Policy applies when the Firm receives a complaint from a client about the conduct of its regulated activities, and having considered the complaint, the Firm decides that redress is appropriate.

2.5.2 The Firm must then:

- (a) Provide the client with fair compensation, financial or otherwise, for any acts or omissions for which it was responsible.
- (b) Give effect to any offer of redress accepted by the client.

2.6 Complaints involving other regulated financial institutions

2.6.1 If your complaint relates partly or entirely to another regulated financial institution, we may refer it to that institution. In such cases:

- We will inform you in writing and ask for your consent before sharing the complaint.
- If you agree, we will refer the matter and provide you with the contact details of the person responsible at that institution.
- We will continue to handle any part of your complaint that is not referred.
- Any transfer of personal data will be carried out in line with applicable data protection laws.

2.7 Resolved Complaints

2.7.1 The Compliance Officer, in conjunction with the Senior Executive Officer, will determine if it is appropriate for the complaint to be accompanied to the client or business partner by a particular staff member and in what format the final response will take. The Compliance Officer may consider this in conjunction with the Senior Executive Officer;

2.7.2 When resolved, the Compliance Officer will notify the Client that the complaint has been resolved, and the appropriate procedures have been followed and finalise the entry in the complaints register.

2.8 Employee Awareness

2.8.1 All employees will be made aware of the complaints handling procedures. Employees are required to confirm their understanding of this Policy, in conjunction with the Compliance Procedures Manual on an annual basis.

3 RECORDING, ANALYSING AND MONITORING

3.1 Recording Complaints

- 3.1.1 The All complaints we receive are recorded by our Compliance Officer in a Complaints Register.
- 3.1.2 The record includes details of the complaint, the complainant's name, who investigated it, all correspondence, and any steps taken to resolve issues or prevent recurrence.
- 3.1.3 Complaints are kept on record for at least 6 years. Complaints Register & Status

3.2 Complaints Report

- 3.2.1 Every complaint is tracked until resolutions.
- 3.2.2 Status "Open" means the complaint is still under review.
- 3.2.3 Status "Closed" means the complaint has been resolved or is deemed outside the

3.3 Compliance Reporting

- 3.3.1 The Compliance Officer reports complaints to the Board, either through standalone Complaint Reports or as part of compliance reporting.
- 3.3.2 These reports ensure remedial actions are taken promptly where required.

3.4 Analysis and Reporting

- 3.4.1 The Board reviews complaints to confirm proper handling and to identify any systemic or procedural issues.
- 3.4.2 Where necessary, the Compliance Officer escalates matters into the Breach Register and requests corrective measures to prevent recurrence.
- 3.4.3 Periodic reports, at least annually, are presented to the Board.

4 APPENDICES

4.1 Appendix 1 Complaints Register

Complaint No.	Date Registered	Send Acknowledgement	Date Acknowledgement	Client	Complaint Description	Resolution Details	External Action

4.2 Appendix 2 - Complaints Report Template - Sample

Number of Complaints for Period _____

Closed Cases _____

Outstanding Cases _____

Business Area(s) Impacted _____

Regulators Contacts: Yes / No

Key Details of Cases

Compliance Officer _____

4.3 Appendix 3 - Individual Complaints Report Template - Sample

Complainant _____

Date Reported _____

Complaint Details

Root Cause

Is this a control weakness involved?

Is this a systemic or likely to be a systemic issue? (Provide a reason why not):

If he was a missing or broken control, what has been or is being done to rectify the issue?

Compliance Officer: _____

4.4 Appendix 4 - Client Complaint Acknowledgement Letter

Date:

[Client Name]

[Client Address]

Dear _____

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

At B2B Prime Services MENA Limited our client 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 Compliance Officer, who will be investigating the situation, and we shall keep you apprised of the outcome as soon as possible. Please see the details of your complaint below:

- Name of the employee in charge:
- Contact: (phone number/email)
- Summary of the Complaint and internal handling procedures:
- Date of next update / expected resolution:

Once again, we wish to thank you for your continued support of B2B Prime Services MENA Limited, 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 way.