

## Complaints Handling Policy

## INTRODUCTION

Companies operating in the financial services industry are bound to have transparent, efficient and effective complaints handling processes and procedures. The ability of retail consumers to be able to complain to financial services providers is regarded as being of the utmost importance by regulators and the industry. This Complaints Handling Policy will analyse the regulatory requirements in relation to complaints handling and how these are transposed into procedures and into the day-to-day operations. This Policy is designed to provide guidance on the manner in which BOV Asset Management Limited receives, handles and resolves complaints, related to its products and services.

## PHILOSOPHY AND PURPOSE OF THE COMPLAINTS HANDLING POLICY

BOV Asset Management Limited (“BOVAM”) has established and implemented appropriate procedures and arrangements to ensure that it deals promptly and reasonably with investor complaints.

## WHAT IS A COMPLAINT?

A complaint is defined as an oral or written expression or statement of dissatisfaction made to the company, relating to the products and services it provides. This includes the complaints handling process itself, the speed and the quality of the response. BOVAM, however, understands that there could be other issues that can be considered as a complaint.

## WHO MAY COMPLAIN?

Any person, organisation or their representative who is dissatisfied with the company’s products or services, for any reason, may submit a complaint.

## COST

There will be no charge to the complainant for making a complaint.

## VISIBILITY

BOVAM’s Complaints Handling Policy is available on the Company’s website [www.bovassetmanagement.com](http://www.bovassetmanagement.com). A printed copy of these procedures may be forwarded upon request.

## HOW CAN A COMPLAINT BE REGISTERED?

### MAIL

A complaint may be registered in writing and mailed to the following address:

BOV Asset Management Limited  
Premium Banking Centre, 475  
Triq il- Kbira San Guzepp  
Santa Venera SVR 1011, Malta

### TELEPHONE

An oral complaint may be registered by calling on phone number +356 21227311 from Monday to Friday between 9am to 4.30pm. In the case of a complaint by telephone, in line with regulatory obligations, BOVAM will forward a written summary of the complaint to the complainant’s registered address. The complainant shall need to confirm that the

complaint summary represents a true and fair description of the complaint. Therefore, the complainant should execute the said summary and arranging for one copy of the summary to be sent back to BOVAM.

#### WHAT DETAILS SHOULD BE INCLUDED WHEN REGISTERING A COMPLAINT?

In order to assist BOVAM in investigating and resolving a complaint in the shortest time-frames possible, complainants are kindly requested to include the following information when registering a complaint.

- Name, address and register number;
- A clear description of the concern or complaint;
- Copies of any relevant documents that could support the complaint.
- Information and personal data provided in lodging a complaint, shall be treated in accordance with the Data Protection Act (Chapter 586 of the Laws of Malta).

The company reserves the right to provide information on complaints and complaints handling to the MFSA and, to alternative dispute resolution entity in the case that a dispute remains.

#### ACKNOWLEDGMENT OF COMPLAINTS

BOVAM is committed to issue an acknowledgment letter or e-mail within two working days of receipt of the complaint which is in line with regulations issues by the Malta Financial Services Authority.

#### RESPONSE TO A COMPLAINT

BOVAM is obliged to provide a response within the maximum period as stipulated by the MFSA of fifteen working days, however the company strives to respond to complaints within the shortest time possible. Any complaints received through email may be responded via the same medium however, when a communication contains sensitive or confidential information, replies shall be sent via registered mail.

#### RIGHTS OF THE COMPLAINANT DURING THE COMPLAINT PROCESS

##### What if our investigation takes longer than fifteen working days?

In exceptional cases, when the investigation of a complaint is not completed within fifteen working days from receipt of the complaint, BOVAM shall:

- i. inform the complainant about the causes of the delay;
- ii. provide an indication as to when the investigation is likely to be completed

In any event, the deadline for receiving the final reply shall not exceed thirty-five business days.

#### RIGHTS OF THE COMPLAINANT

If the complainant is unsatisfied with the company's reply or no agreement has been reached, the complainant has the right to refer the matter to the Office of the Arbiter for Financial Services by writing to:

The Office of the Arbiter for Financial Services, N/S in Regional Road, Msida, MSD 1920

Further information may be obtained through the official website: [www.financialarbiter.org.mt](http://www.financialarbiter.org.mt), Freephone (local calls): 8007 2366 and Telephone: (356) 21249245.

## Politika ta' Trattament tal-Ilmenti

## INTRODUZZJONI

Il-kumpaniji li jaħdmu fl-industrija tas-servizzi finanzjarji huma obbligati li jkollhom proċessi u proċeduri trasparenti, effiċjenti u effettivi għat-trattament tal-ilmenti. Il-kapaċità tal-konsumaturi li jilmentaw mal-fornituri tas-servizzi finanzjarji hija meqjusa importanti ħafna mir-regolaturi u mill-industrija. Il-Politika ta' Trattament tal-Ilmenti se tanalizza r-rekwiżiti regolatorji fir-rigward tat-trattament tal-ilmenti u kif dawn jiġu trasposti fi proċeduri u f'operazzjonijiet ta' kuljum. Dawn il-proċeduri huma mfassla biex jipprovdu gwida dwar il-mod kif il-BOV Asset Management Limited tircievi, tittratta u ssolvi l-ilmenti, relatati mal-prodotti u s-servizzi tagħha.

## IL-FILOSOFIJA U L-GĦAN TAL-POLITIKA TA' TRATTAMENT TAL-ILMENTI

Il-BOV Asset Management Limited ("BOVAM") stabbilixxiet u implimentat proċeduri u arrangamenti xierqa biex tiżgura li tittratta malajr u b'mod raġonevoli l-ilmenti tal-investituri.

## X'INHU ILMENT?

L-ilment huwa ddefinit bħala espressjoni jew dikjarazzjoni orali jew bil-miktub tan-nuqqas ta' sodisfazzjon li ssir lill-kumpanija, fir-rigward tal-prodotti u s-servizzi li tipprovdi. Dan jinkludi l-proċess tat-trattament tal-ilmenti nnifsu, il-veloċità u l-kwalità tar-rispons. Il-BOVAM madankollu tifhem li jista' jkun hemm sitwazzjonijiet oħra li jistgħu jitqiesu bħala ilment.

## MIN JISTA' JAGĦMEL ILMENT?

Kwalunkwe persuna, organizzazzjoni jew ir-rappreżentant tagħhom li mhuwiex sodisfatt bil-prodotti jew is-servizzi tal-kumpanija, għal kwalunkwe raġuni, jista' jippreżenta ilment.

## SPEJJEŻ

Min jagħmel l-ilment ma jeħel l-ebda spejjeż mill-Bank.

## VIŻIBILITÀ

Il-Proċedura ta' Trattament tal-Ilmenti tal-BOVAM hija disponibbli fuq il-websajt tal-Kumpanija: [www.bovassetmanagement.com](http://www.bovassetmanagement.com). Kopja stampata ta' dawn il-proċeduri tista' tintbagħat meta ssir talba għaliha.

## KIF JISTA' JIĠI RREGISTRAT ILMENT?

### BIL-POSTA

L-ilment jista' jiġi rreġistrat bil-miktub u jintbagħat bil-posta f'dan l-indirizz li ġej:

BOV Asset Management Limited  
Premium Banking Centre, 475  
Triq il-Kbira San Guzepp  
Santa Venera SVR 1011, Malta

### BIT-TELEFON

L-ilment orali jista' jiġi rreġistrat billi wieħed iċempel fuq in-numru tat-telefon: +356 21227311 mit-Tnejn sal-Ġimgħa bejn id-9am u l-4.30pm. Fil-każ ta' ilment bit-telefon, f'konformita mal-obbligi regolatorji, il-BOVAM se jibgħat sommarju bil-miktub tal-ilment fl-indirizz rreġistrat tal-

ilmentatur. L-ilmentatur huwa mitlub jikkonferma li s-sommarju jirrapprezenta deskrizzjoni vera u ġusta tal-ilment billi jiffirma kopja tas-sommarju tal-ilment u jibghata lura lil-BOVAM.

### X'DETTALJI GĦANDHOM JIĠU INKLUŽI META JIĠI RREĠSTRAT ILMENT?

Bħala għajnuna għall-BOVAM biex tinvestiga u ssolvi l-ilment fl-anqas żmien possibbli, l-ilmentaturi huma ġentilment mitluba jinkludu din l-informazzjoni li ġejja meta jirreġistraw l-ilment:

- L-isem, l-indirizz u n-numru tar-reġistru;
- Deskrizzjoni ċara tat-tħassib jew ilment;
- Kopji ta' kwalunkwe dokumenti rilevanti li jstgħu jsostnu l-ilment.

L-informazzjoni u d-data personali pprovduti biex jitressaq ilment, għandhom jiġu ttrattati skont l-Att dwar il-Protezzjoni tad-Data (Kapitolu 586 tal-Liġijiet ta' Malta). Il-kumpanija tiriserva d-dritt li tipprovi informazzjoni dwar l-ilmenti u l-immaniġġjar tal-ilmenti lill-MFSA u, għal entità alternattiva għas-soluzzjoni tat-tilwim fil-każ li tibqa' tilwima.

### RIKONNOXIMENT TAL-ILMENTI

Il-BOVAM hija impenjata li toħroġ ittra jew posta elettronika ta' rikonoxximent fi żmien jumejn ta' xogħol minn meta tirċievi l-ilment li jkun konformi mar-regolamenti maħruġa mill-Awtorità għas-Servizzi Finanzjarji ta' Malta.

### RISPONS GĦALL-ILMENTI

Il-BOVAM hija obbligata tipprovi rispons fi żmien il-perjodu massimu stipulat mill-MFSA li huwa ta' ħmistax-il ġurnata, madankollu l-Kumpanija tħabrek biex twieġeb għall-ilmenti fl-anqas żmien possibbli. Kwalunkwe ilment li jasal permezz tal-posta elettronika jista' jingħata tweġiba permezz tal-posta elettronika wkoll, madankollu fejn kwalunkwe komunikazzjoni jkun fiha informazzjoni sensittiva jew kunfidenzjali t-tweġibiet għandhom jintbagħtu permezz tal-posta reġistrata.

### ID-DRITTIJET TAL-ILMENTATUR MATUL IL-PROCESS TAL-ILMENT

#### X'jiġri jekk l-investigazzjoni tagħna ddum aktar minn ħmistax-il ġurnata?

F'każijiet eċċezzjonali fejn l-investigazzjoni ta' ilment ma tispiċċax fi żmien ġimagħtejn minn meta jasal l-ilment, il-BOVAM għandha:

- i. tiforma lill-ilmentatur dwar il-kawżi tad-dewmien;
- ii. tipprovi indikazzjoni ta' meta l-investigazzjoni aktarx li tintemm

Fi kwalunkwe każ, id-data ta' skadenza biex tintlaqa' t-tweġiba finali m'għandhiex teċċedi ħamsa u tletin jum ta' xogħol.

### ID-DRITTIJET TAL-ILMENTATUR

Fil-każ fejn l-ilmentatur ma jkunx sodisfatt bit-tweġiba tal-Kumpanija jew ma jkun intlaħaq l-ebda ftehim, l-ilmentatur għandu d-dritt jirreferi l-kwistjoni lill-Uffiċċju tal-Arbitru għas-Servizzi Finanzjarji bil-miktub f'dan l-indirizz:

L-Uffiċċju tal-Arbitru għas-Servizzi Finanzjarji, N/S in Regional Road, Msida, MSD 1920

Aktar tagħrif jista' jinkiseb permezz tal-websajt uffiċjali: [www.financialarbiter.org.mt](http://www.financialarbiter.org.mt), Freephone (sejħiet lokali): 8007 2366 u Telefon: (356) 21249245