



Complaint Handing Procedure

DATE	VERSION	DETAILS	SIGNATURE
03/06/2025	1.0	Complaints Handling Procedure To ensure all complaints from consumers are handled promptly, fairly, and in accordance with the CPC, thereby maintaining trust and transparency in our services.	C. McDermott
24/03/2026	1.1	Updated in accordance with revised CPC 2025	C. McDermott

As a financial broker operating in Ireland, it's essential to establish a comprehensive complaint handling procedure that aligns with the Consumer Protection Code (CPC) set forth by the Central Bank of Ireland. Below is Ethico Ltd's procedure to ensure complaints are managed effectively and in compliance with regulatory requirements.

1. Scope

This procedure is operated by the firm in relation to its financial services provided under the Consumer Protection Code 2025. This procedure applies to all employees and representatives of Ethico Ltd. involved in receiving, managing, or resolving consumer complaints.

Our objectives:

- To respond to complaints in a courteous, timely and fair manner.
- Take all reasonable steps to resolve any complaint with the consumer making the complaint.
- To endeavour to address the specific issues raised by our customers and, where appropriate, update our procedures to avoid re-occurrence of problems.
- To endeavour to achieve a situation where our customer feels we have addressed the complaint, but if he/she remains dissatisfied with the outcome of our efforts, to ensure that he/she is notified of the right to refer the matter to the Financial Services and Pensions Ombudsman (FSPO).

2. Complaints Handling Procedures

- a. The firm will establish and maintain a complaints file and all complaint records will be kept for six years from the end of the client relationship.
- b. Receiving Complaints
 - Oral Complaints: When an oral complaint is received, offer the consumer the opportunity to have it handled through this formal complaint process. The firm will investigate the complaint on the basis of our understanding of the issue.
 - The firm shall permit and facilitate submission of complaints in writing by post and by electronic means.
 - The firm will implement and maintain systems and controls to effectively track and manage the progress and resolution of complaints.
 - Written Complaints: All written complaints should be forwarded immediately to the designated complaints officer.
- c. Acknowledgement
 - Acknowledge each complaint in writing within five working days of receipt. This acknowledgment should include:
 - The name of the individual appointed as the complainant's point of contact.
 - An outline of the complaints handling procedure and notification.
 - The complainant can refer the matter to the Financial Services and Pensions Ombudsman (FSPO) if he/she is not happy with the outcome of our investigation, or if the matter has not been resolved within 40 working days, the anticipated timeframe within which the firm hopes to resolve the complaint. Contact details of the Financial Services and Pensions Ombudsman (FSPO) will also be provided.
 - The firm shall provide the consumer making the complaint, or the person making the complaint on the consumer's behalf, with a point or points of contact in relation to the complaint until the complaint is resolved or all steps of the firm's complaints handling procedures have been exhausted.
- d. Investigation
 - The appointed individual will conduct a thorough investigation of the complaint, ensuring all relevant facts are reviewed.

- We shall investigate the complaint as swiftly as possible and shall provide the consumer making the complaint with regular updates at intervals not greater than 20 working days.
- e. Resolution
 - Aim to resolve all complaints within 40 working days of having received the complaint.
 - After 40 working days has elapsed and the complaint is not resolved the, the complainant will be informed of:
 - The anticipated timeframe within which the firm hopes to resolve the complaint
 - The right to refer the matter to the Financial Services and Pensions Ombudsman (FSPO).
 - The contact details of the FSPO will be provided.
 - Within five working days of completing the investigation, the firm shall advise the consumer making the complaint on paper or another durable medium of:
 - The decision at the conclusion of the investigation including the reasons for that decision.
 - Where applicable, the terms of any offer or settlement being made to the consumer making the complaint.
 - Where the consumer has a right to refer the matter to the relevant ombudsman, the fact that the consumer may refer the matter to the FSPO and the contact details of the FSPO

Where it appears to the firm that the complainant is not satisfied with the outcome of our investigation, and where we feel that we cannot progress the issue further, we will immediately write to the complainant advising them of their right to refer the dispute to the Financial Services and Pensions Ombudsman (FSPO).

A senior manager will review the file before its conclusion and attempt to identify any procedures that can be implemented by our firm to avoid a repeat of the type of complaint received. Any new procedures will be immediately communicated to all staff and placed in the Written Procedures file.

The Compliance Manager is responsible for complaints in this firm.

3. Record Keeping

- a. Maintain an up-to-date log of all complaints, capturing:
 - Details of each complaint.
 - Dates received and resolved.
 - Summary of responses and actions taken.
 - Current status, especially if referred to the FSPO.
- b. Ensure comprehensive records are kept for each complaint, including all correspondence and documentation.

4. Analysis and Reporting

- a. 6 monthly analyses of complaint patterns to identify potential systemic issues.
- b. Escalate findings to senior management for review and action.

5. Consumer Awareness

- a. Make the complaints handling procedure readily available to consumers, both online and upon request.
- b. Ensure staff are trained to guide consumers on how to lodge a complaint and inform them of their rights, including the option to escalate unresolved complaints to the FSPO.

By implementing this procedure, Ethico Ltd commit to upholding the highest standards of consumer protection and regulatory compliance in our complaints handling process.