

# Training for Financial Institutions

## Complaints and Appeals Policy

### Contents

<b>A. COMPLAINTS POLICY AND PROCEDURES</b> .....	<b>2</b>
1. Introduction .....	2
2. General Guidelines for Complaints Handling .....	2
3. Submitting a Complaint .....	2
3.1 Informal Resolution of Complaint.....	2
3.2 Formal Resolution of Complaint.....	3
4. Complaints Register .....	3
<b>B. APPEALS POLICY AND PROCEDURES</b> .....	<b>3</b>
1. Introduction .....	3
2. Grounds for an Appeal .....	4
3. Appeals Procedure .....	4
4. Approval Process.....	4

## A. COMPLAINTS POLICY AND PROCEDURES

### 1. Introduction

This policy outlines the management process undertaken by Waystone Compliance Solutions (Singapore) Pte Ltd. (the “Company”) for reviewing and responding to complaints or appeals in a timely, fair and transparent manner.

The purpose of the complaints policy is to ensure that, as far as possible, complaints are dealt with and resolved in a timely manner. Complaints may be raised verbally or via in writing.

The Company believes that if a participant wishes to make a complaint or register a concern, they should find it easy to do so.

It is the Company’s policy to welcome complaints and look upon them as opportunity to learn, adapt and improve services. This procedure is intended to ensure that complaints are dealt with properly and that all complaints or comments from participants are taken seriously.

The procedure is not designed to apportion blame, but rather to ensure that the Company is able to continuously improve its services and levels of customer service and satisfaction. The Company ensures that there are sufficient platforms to facilitate complaints and that the process is easy to follow, fair and sensitive to both staff and the complainant.

### 2. General Guidelines for Complaints Handling

It is essential that Company attend promptly and fairly to all complaints. Each complaint, whether justified or not, should be fairly and thoroughly investigated and rectified within a reasonable time frame.

The following high level rules must be remembered at all times: -

- Company employees may not investigate feedback against themselves
- Company employees must not be drawn into a slanging-match with person who lodged the complaint.
- Company employees must not without proper authority, say anything to the person who lodged the complaint that could be used against the Company as an admission of liability.
- No verbal confirmation or explanation is allowed with media or any regulatory bodies, unless authorised by the Company

### 3. Submitting a Complaint

A participant who wishes to raise a formal complaint should do so by contacting the Company at [compliancewcss@waystone.com](mailto:compliancewcss@waystone.com) by email or send a letter to:

Waystone Compliance Solutions (Singapore) Pte. Ltd., 6 BATTERY ROAD, #17-06, SINGAPORE 049909.  
All complaints should contain the following key information:

- Details of complaint; and
- The form of resolution or redress desired

#### 3.1 Informal Resolution of Complaint

Informal management of feedback, which is normally the verbal complaint to the administrative staff of the respective department and can be taken as minor problem, will be attempted / resolved on the same day

as it is received before escalation to Complaint/ Grievance or Written Complaint/ Grievance (major problem).

### 3.2 Formal Resolution of Complaint

If complaints are unresolved on the same day (i.e., complainant is not satisfied with the resolution by the respective) the Participant will be required to submit a formal complaint in writing.

Participants will receive an acknowledgement of complaint received within five business days of receipt of complaint. Complaint will be investigated, and resolution will be provided to participant within 15 business days. Where not possible to adhere to the timeline or where further investigation is required, Company will provide a written reply to participant and provide an update of when a resolution can be expected.

If resolution is accepted and no further action is required, a final letter of conclusion will be furnished to participant to close the complaint and the complaint register will be updated accordingly. Company will discuss the feedback and complaint with the management team to draw learning points.

In the event that the participant and the Company are unable to resolve a dispute or grievance amicably after going through the procedure, either party may approach the Small Claims Tribunals (SCT) or through their own legal counsel.

CPE Contact Details:

Telephone: 6512 1140

Email: [CPE\\_CONTACT@cpe.gov.sg](mailto:CPE_CONTACT@cpe.gov.sg)

## 4. Complaints Register

Once the investigation is complete and the complaint resolved, the Company will respond to the participant and complete the Complaints Register. The Register will contain at least the following information: -

- Reference number
- Name of Participant
- Name of complainant (if different from customer concerned)
- Date of complaint
- Details of complaint
- Amount involved (if applicable)
- Date of Acknowledgement Letter
- Manner of resolution and/or conclusion

## B. APPEALS POLICY AND PROCEDURES

### 1. Introduction

The policy here sets out the process for handling appeals concerning assessments conducted by the Company. For any complaints or issues related to the trainings provided by the Company, participants should reach out to the Company as per the procedures described above.

Company will treat all complaints seriously and will deal with them pro-actively. Where, however, an appeal is shown to be frivolous, or motivated by malice, disciplinary action may be taken against the complainant.

The procedure below can only be used when there are eligible grounds for doing so and may not be used simply because the participant is dissatisfied with the outcome of his/ her assessment or other decisions concerning their participation in the training programs conducted by the Company.

## 2. Grounds for an Appeal

Participant may make an appeal on the following grounds:

- a) There exist circumstances affecting the participants' performance which, for good reason, the Company may not have been made aware when the decision was taken and which might have had a material effect on the decision
- b) There has been material administrative error or procedural irregularity in the assessment process
- c) There is evidence of prejudice or bias or lack of proper assessment on the part of one or more of the examiners

An appeal which questions the academic or professional judgment of the trainers or any other employees of the Company who are tasked to assess the participant's performance or professional competence will not be permitted.

## 3. Appeals Procedure

Participants may initiate a formal appeal in writing and submit to the Company within 20 days of notification of the result or decision.

All appeals must be submitted to [compliancewcss@waystone.com](mailto:compliancewcss@waystone.com)

Participants must submit with the appeal any other documents he or she wishes to be considered in the appeal. These include:

- Course outcomes/ evaluations
- Written academic decisions
- Statement of remedy sought after

## 4. Approval Process

All appeals are reviewed and assessment by the Appeals Committee which consists of the training program creator, the examiner, and the CEO of the Company.

Based on its initial review, the Company may return an appeal to the participant for further information or clarification. If the appeal is returned for further information or clarification, the participant must submit the requested information or revision within 10 business days for the appeal to be heard.

Upon review of the initial or resubmitted appeal, the Company may determine that there are no grounds for the appeal in accordance to paragraph 2 above and rejects the appeal.

The Company shall convey a decision not to hear an appeal within 5 business days of receiving the initial or resubmitted appeal.

If the appeal is accepted, the Company shall notify the participant in writing the successful outcome of the appeal and take steps to rectify the assessment outcome within the next 20 days.

All appeal records will be maintained and reviewed to ensure actions have been put in place to prevent reoccurrence of complaints.