



**MAPLES**  
GROUP

# Complaints Policy

**Maples Corporate Services (BVI) Limited**  
**MaplesFS (BVI) Limited**  
**MaplesFS Nominees 1 Limited**  
**MaplesFS Nominees 2 Limited**  
**MaplesFS Nominees 3 Limited**  
**MaplesFS Nominees 4 Limited**  
**MaplesFS Nominees 5 Limited**  
**MaplesFS Nominees 6 Limited**  
**SHR Corporate Services Limited**

**February 2022**



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# Document Versions

| Document number | Reviewed By | Approved By | Approval Date   |
|-----------------|-------------|-------------|-----------------|
| 69177671v1      | KQR/SJN     | RBM         | 9 February 2022 |
|                 |             |             |                 |

## Part 1

### Complaints Policy

In the following "Maples", "we", "us" and "our" mean Maples Corporate Services (BVI) Limited, a British Virgin Islands ("BVI") business company that holds a Class I Trust License issued by the Financial Services Commission and its licensed subsidiaries<sup>1</sup>.

Our aim is to provide a professional service at all times. If, however, you have a complaint about some aspect of the service that you receive you should let us know as soon as possible.

This procedure relates to services and products provided by Maples only.

#### 1 Introduction

The Regulatory Code 2013 (as amended) provides that Maples shall establish and maintain a complaints policy for the effective consideration and proper handling of any complaint, and, where appropriate, for appropriate remedial action to be taken. Maples shall also maintain a complaints register in which any complaints received shall be recorded together with details on how the complaint was or is being dealt with.

#### 2 Time limit for making complaints

- 2.1 It is important that you let us have your complaint in writing as soon as possible. This is so that we can investigate your complaint promptly and in the interests of fairness to all those concerned. In order for us to investigate your complaint please fill in a standard complaint form which we will supply to you on request (the "**Complaint Form**"). A copy of the Complaint Form is contained at Part 2 of this policy.
- 2.2 If we do not receive your completed Complaint Form within six (6) months of the specific matter you complain about, we may decide that we can no longer deal with it. In deciding whether to deal with a complaint which is more than six (6) months old, we will bear in mind the seriousness of the complaint and any exceptional circumstances that justify investigation of it.

#### 3 Making your complaint

- 3.1 Please note the following when making a complaint:
  - (a) the complaint should be made in writing on the Complaint Form. We will only commence formal investigation of a complaint once we have received a fully completed Complaint Form;
  - (b) please use the Complaint Form to explain the nature of the complaint as clearly and precisely as you can. You should return the completed Complaint Form to us within seven (7) days of the date on which it was sent to you; and

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<sup>1</sup> MaplesFS (BVI) Limited, MaplesFS Nominees 1 Limited, MaplesFS Nominees 2 Limited, MaplesFS Nominees 3 Limited, MaplesFS Nominees 4 Limited, MaplesFS Nominees 5 Limited, MaplesFS Nominees 6 Limited, and SHR Corporate Services Limited

- (c) we will acknowledge receipt of your complaint within five (5) working days of receipt of the completed Complaint Form.

#### **4 Investigation procedure**

- 4.1 The procedure that we will follow in investigating your complaint is as set out below.
- 4.2 Once your completed Complaint Form is received, an investigator (who will not be a person to whom your complaint relates) (the "**Investigator**") will be appointed and will write to you within ten (10) working days to let you know that he or she has been appointed.
- 4.3 The Investigator will carry out an investigation and will report on your complaint within thirty (30) working days after receipt of your completed Complaint Form. If the investigation is delayed, the Investigator will set a new date for completion of the investigation and will inform you of that date in writing. You should receive a response within a maximum of forty (40) working days from receipt of your completed Complaint Form.
- 4.4 During the course of the investigation, the Investigator may need to disclose the fact of your complaint and the details of it to:
  - (a) the persons(s) to whom your complaint relates;
  - (b) any person whom the Investigator considers may assist in any investigation of your complaint;
  - (c) our insurers; and
  - (d) the Financial Services Commission.

The Investigator will not however disclose the fact of your complaint or details of it to anyone else outside of Maples unless the Investigator determines that it is necessary to do so in the interests of a full and fair investigation.
- 4.5 The Investigator will not hear oral evidence in support of your complaint. Any request the Investigator may make for information and any response to such request will be made in writing and a record retained.
- 4.6 The Investigator's report will set out:
  - (a) the nature and scope of the investigation;
  - (b) the conclusion that the Investigator has reached on each matter of complaint and the reason(s) for such conclusions;
  - (c) if your complaint is found to be justified, proposals for resolving it.
- 4.7 The Investigator's report will be sent to you, to the Directors of Maples and to the person your complaint relates to. Unless Maples receives an indication from you that the response is unsatisfactory, we will be entitled to treat the complaint as settled after four (4) weeks from the date of delivery of the report.

## **5 Significant Complaints**

5.1 Maples may deem your complaint to be a significant complaint ("**Significant Complaint**") if it alleges:

- (a) a breach of regulatory enactment;
- (b) bad faith, malpractice or impropriety on the part of Maples or one of its directors, employees or agents;
- (c) the repetition or recurrence of a matter previously complained of (whether significant or otherwise); or
- (d) that you have suffered, or may suffer, financial loss that is material in relation to your financial circumstances.

5.2 A complaint shall not be treated as significant if it relates to a minor clerical error.

5.3 Any Significant Complaints must be disclosed to the Financial Services Commission.

5.4 If your Significant Complaint is unsettled for longer than three months you may inform the Financial Services Commission directly of your complaint:

Financial Services Commission  
Pasea Estate  
P.O. Box 418  
Road Town, Tortola, VG 1110  
British Virgin Islands

## **6 Confidentiality**

6.1 All persons to whom your complaint is disclosed pursuant to this procedure will be required to keep your complaint and the details of it, and all conversations, written communications and documents relating to it, confidential.

## Part 2

### Complaint Form

Please use this form if you want to make a complaint about services provided by Maples Corporate Services (BVI) Limited and/or its licensed subsidiaries<sup>2</sup>.

Before completing this form, please read Part 1, Maples complaints policy (the "**Complaints Policy**").

Please send this Complaint Form (when completed) to the Compliance Officer at Maples Corporate Services (BVI) Limited at Ritter House, PO Box 173, Road Town, Tortola, VG1110, British Virgin Islands.

| <b>1. Details of the person making the complaint</b>   |        |
|--|--------|
| Title:   |        |
| Full name:   |        |
| Address:   |        |
| Email address:   |        |
| Telephone number:  |        |
| Are you a client?  | YES NO |
| <b>2. If you are making this complaint on behalf of someone else</b>   |        |
| <i>Please complete this section, giving your details. Please also attach a letter of authority signed by the person on whose behalf you are complaining.</i> |        |
| Title:   |        |
| Full name:   |        |
| Address:   |        |
| Email address:   |        |
| Telephone number:  |        |
| Our reference:   |        |
| Please state the capacity in which you are making this complaint:  |        |
| <b>3. Name of the Maples person to whom your complaint relates (the "Person")</b>  |        |
| Please give the name of the person(s):   |        |
| <b>4. Name of the BVI Company that Maples is Registered Agent to which your complaint relates</b>  |        |
| Company Name(s):   |        |

<sup>2</sup> MaplesFS (BVI) Limited, MaplesFS Nominees 1 Limited, MaplesFS Nominees 2 Limited, MaplesFS Nominees 3 Limited, MaplesFS Nominees 4 Limited, MaplesFS Nominees 5 Limited, MaplesFS Nominees 6 Limited, and SHR Corporate Services Limited

|  |     |    |
|--|-----|----|
| <b>8. Date of matter complained about</b>  |     |    |
| On what date did the matter you are complaining about take place? If you are complaining about a series of matters, please give the date of each matter you are complaining about: |     |    |
| <b>9. Complaints that are more than 6 months old</b>   |     |    |
| If the matter you are complaining about happened more than 6 months ago, please explain why there has been a delay in making your complaint:                                       |     |    |
| <b>10. Facts and matters giving rise to your complaint</b>   |     |    |
| Please state briefly the facts and matters which give rise to your complaint. Please continue on a separate sheet, if necessary.   |     |    |
| <b>11. Your complaint</b>  |     |    |
| Based upon the facts and matters set out above, what is the essential nature of your complaint? Please continue on a separate sheet, if necessary.                                 |     |    |
| <b>12. Resolving your complaint</b>  |     |    |
| How would you like your complaint to be resolved?  |     |    |
| Explanation:   | YES | NO |
| Apology:   | YES | NO |
| Reduction or refund of fees:   | YES | NO |
| If you have ticked 'Reduction or refund of fees', please explain the basis upon which you are seeking a reduction or refund:   |     |    |



|   |  |
|---|--|
| <p>If none of the above applies, please specify how you would like to resolve your complaint:</p> |  |
|---|--|

**Declaration**

I / we:

- (a) have read the Complaints Procedure before completing this form;
- (b) have completed all sections of this form;
- (c) agree that this form and any documents and information which I have provided or shall in the future provide for the purposes of or in the course of the investigation of my complaint may be disclosed as set out in the Complaints Procedure.

The information given in this form is accurate and complete.

| Individual     |  |
|----------------|--|
| <b>Signed:</b> |  |
| Full name:     |  |
| Date:          |  |

| Entity                |  |
|-----------------------|--|
| <b>Signed:</b>        |  |
| Full name:            |  |
| Position:             |  |
| Date:                 |  |
| For and on behalf of: |  |