



# APAC CIB & WM Client Complaint Policy

<b>Owner entity *</b>	OE 11202259 - APAC			
<b>Co-owner entity (ies)</b>	N/A			
<b>Involved Process(es)*</b>	L1 - PR00013 After sales, Trades & Transactions	Select an item	Select an item	Select an item
<b>Involved Risk(s)*</b>	L1 - RIT0001 / L2 - RIT0023 / L3 - RE00147 Risk that clients complaints are not properly handled / L4RE00009 Risk that clients complaints are not properly handled	Select an item	Select an item	Select an item
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<b>Level *</b>	Level 3			
<b>Procedure type *</b>	1- Policy			
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<b>Scope of Application: Covered entity</b> (BU, BUG, OE, LE) *				
<b>Geographical Scope of Application: Applying entity</b> (region, territory) *	APAC			
<b>Geographical Scope of Application: Covered entity</b> (region, territory) *	APAC			
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<b>Regulatory text(s) / legal provision(s)</b>	N/A
<b>Control plan(s)/control (s) re. if any</b>	CPL0330 – Compliance LOD1 Generic Control Plan – Protection of Interests of Clients

\* *Mandatory fields*

\*\* *Mandatory fields when relevant: if the field is not completed, it means it is not relevant*

**All roles, responsibilities and tasks mentioned in this document are undertaken by BNP Paribas Employees without distinction of gender.**

## EXECUTIVE SUMMARY

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This document describes the client complaints management process, the roles and responsibilities of parties involved in the process, framework for monitoring and reporting, and continuous improvement.

## WHAT'S NEW?

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This renewal covers the following key changes:

- Review of policy for consistency and accuracy
- Integration of previously separate WM and 2S sections alongside GM, GB and ALMT
- Updated to reflect organisational changes
- Removal of redundant appendices



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## VERSION HISTORY

Version	Date	Status/Action
V1.0	31 <sup>st</sup> January 2020	Validated by Jean-Patrick Kaiser
V1.1 (Major Update)	2 <sup>nd</sup> July 2020	Included CDL APAC in scope
V1.1 (Minor Update)	19 <sup>th</sup> October 2020	Updated the Malaysia accessibility requirements in Appendix 1 to ensure that the complaint handling process is easily accessible to all customers. The accessibility requirements include publishing of information on how to make a complaint, details of the complaint unit, etc. The changes were coordinated by MY Compliance.
V1.1 (Minor Update)	1 <sup>st</sup> April 2021	There is an update of Indonesian regulation from OJK No.1/POJK.04/2014 to OJK No.1/POJK.04/2020. The corresponding reference in Appendix I: Territory-specific requirement for Indonesia has been updated accordingly. Also, there are new requirements in terms of the local reg reporting
V1.1 (Minor Update)	11 <sup>th</sup> November 2021	Include local specific requirements for Australia and New Zealand in Appendix 1
V2.0 (Major Update)	31 <sup>st</sup> January 2022	Main updates relate to MCC audit trail requirements, R&R of Business Conduct, reporting and business line specific updates (GB new organisation, removing WM India & WM China)
V2.1 (Minor Update)	15 <sup>th</sup> February 2023	Regulatory requirements update in Appendix 1: <ul style="list-style-type: none"> <li>• Hong Kong: updated the handling of final response and added a paragraph on the review mechanism</li> <li>• Malaysia: updated the PayNet requirements</li> </ul>
V3.0 (Major Update)	TBC	See What's New?

## DOCUMENT MAINTENANCE

The APAC Chief Conduct & Control Officer (CCCO), as owner of this policy, delegates responsibility for the maintenance of this document to the Head of the Transversal CCCO Team, as author. Maintenance of the Métier Complaint Contact ("MCC") contact list falls under the responsibility of the relevant regional business line CCCO. The policy will be stored in My Procedures (by CIB) and renewed at least every 24 months in keeping with the renewal date specified on the cover page.

For any amendments required before the next renewal date, Local Compliance (for territory-specific requirements) or MCC (for business line-specific requirements) should raise a request by email to APAC PROCEDURES MANAGEMENT. Such amendments do not impact the renewal date and are subject to:

- local validation of the impacted territories and/or businesses, coordinated by territory OPC or regional business line OPC, as applicable, and
- final validation by the APAC CCCO.





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## 1. PURPOSE OF THE POLICY

At both organisational and individual employee level, we are committed to listening to our clients, whether they express satisfaction, share negative feedback or submit complaints. Protecting clients' interests not only means complying with statutory and regulatory requirements, but also includes operating efficiently and business growth.

This document describes the procedure for management client complaints, roles and responsibilities of parties involved, framework for monitoring and reporting, and requirement for continuous improvement. Employees should always apply local regulations and standards (refer to Appendix 1) if these are more restrictive than the policy.

## 2. SCOPE

This procedure applies to the following Asia Pacific<sup>1</sup> (APAC) businesses, including all their activities, services, products and employees<sup>2</sup>:

- Corporate and Institutional Banking (CIB):
  - Global Markets (GM)
  - Securities Services (2S)
  - Global Banking (GB)<sup>3</sup>
  - Financial Institutions Coverage (FIC)
- Asset & Liability Management & Treasury (ALMT)
- Wealth Management (WM)

For business line specific application, refer to the following global / regional client complaints management procedures:

- GM: [Global Markets Complaints Management – Conduct Governance Procedure](#)
- GB: [DMA Client Complaints Management – Conduct Governance Framework](#)
- 2S: [Client Complaints Handling Corporate Policy](#)
- WM: [Client Complaints Handling](#) and WM APAC IN67 - Customer Complaints Handling

The management of complaints related to Designated Market Activities (DMA), including potential complaints related to DMA-related risks (market integrity, protecting customers' interests and professional ethics) follows the same guidance as covered by this policy.

Complaints related to outsourced activities, whether Group or external suppliers, are in scope. Stakeholders of outsourced suppliers should be included in the complaints management process.

Any activity not covered by the above businesses in any of the APAC territories may use this policy as guidance for complaints management.

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<sup>1</sup> Refer to Appendix 1 for Territory-specific requirements

<sup>2</sup> Employees include individuals on permanent or fixed term contracts, contractors, consultants, agency staff, and VIEs

<sup>3</sup> Including Loan Book



### 3. COMPLAINT DEFINITION

All in-scope businesses have operationally adopted the following definition for a complaint:

*A "complaint" denotes a declaration of dissatisfaction by an identified client. Requests for information, opinion, clarification, or service, as well as summons, are not complaints. A complaint may be formulated in writing in any form, for example letter, e-mail, social networks, forums, etc. A complaint may also be formulated orally, in which case it must be followed by a traceable document so it can be processed in the same way as a written complaint. Traceable documents include internal emails, logs, or escalation via other written documentation.*

The term "case" is used throughout this document in relation to incoming information to be assessed for constituting a client complaint.

### 4. ROLES AND RESPONSIBILITIES

The following actors are key to the set-up of an efficient complaints management process:

**Coverage / Relationship Manager (RM) / Client Services Management (CSM) / GM Sales**

- Responsible for all complaint-related communication with client, such as acknowledgement of receipt of complaint and intermediate and/or final responses
- All complaint-related communication with client requires pre-approval of the Métier Complaint Contact (MCC)

**All employees (including but not limited to RMs, Coverage, client facing, ITO, other Functions)**

- Potential direct contact with client to receive or detect potential complaints
- Gather required information for audit trail, liaising with line manager as necessary
- Forward potential complaint to the (MCC)

**Métier Complaint Contact (MCC)<sup>4</sup>**

- Primary contact with sufficient authority within the business line responsible for managing the client complaints process in respect of the business line's products or services<sup>5</sup>
- Consult with the 1<sup>st</sup> and 2<sup>nd</sup> lines of defence as needed
- Inform Territory OPC and the Territory COO upon the receipt of a potential complaint, and in addition for HK and SG, inform the regional OPC and COO of the relevant business line
- Where a potential complaint involves the local regulator, inform Territory Compliance
- Appoints, or ensure the appointment of (an) Issue Owner(s), if necessary, who will be responsible for investigation and action plan implementation
- Determine classification as a complaint, negative feedback or other
- For cases not classified as complaints: keep audit trail of classification decision in a shared, secure location accessible to relevant stakeholders (e.g. shared folder or shared mailbox)
- For cases classified as negative feedback: send back the case to the corresponding client facing team or the equivalent appropriate team to respond to the client

<sup>4</sup> Refer to Appendix 2 for guidelines on the appointment of MCCs. For 2S, MCC is specifically appointed within the CSM team. For WM, the MCC is known as the (Entity) Complaints Process Manager (CPM)



- For cases classified as complaints:
  - record the complaint in a workflow system<sup>6</sup> along with a description of the details of complaint, to evidence complaint logging
  - record updates in a workflow system when the complaint has been acknowledged and when intermediate and/or final responses to have been sent
- Accountable for workflow tasks to be completed by responsible parties and support the progress of the complaint flow
- Accountable for defining the population for training in their business line. Training delinquencies are dealt with through the normal mandatory training escalation process
- Contribute to the updating / development of training material as needed, *e.g.* complaints use cases
- Facilitate the escalation process within the business line, where necessary
- If a case requires reallocation to a different business line, confirm agreement with the receiving business line's MCC and Territory COO (original MCC remains owner until agreement confirmed)
- If the MCC becomes aware of potential, actual or perceived conflicts of interest for the MCC or another stakeholder, the MCC should escalate the case to Territory COO
- The MCC list is available at [Echonet > My Entity > APAC CIB & WM Client Complaint Policy](#)
- Where both primary and alternative MCCs are noted, alternative MCCs only take on responsibilities if the primary MCC is unavailable or a conflict of interest arises. Once an MCC is appointed, the MCC remains responsible for the client complaint process unless the responsibility is reassigned with the approval of the Territory COO

## LOD1 control & oversight for client complaints

- 2S: Control and oversight responsibility for complaints, for both the framework and case-by-case individual complaints, falls under CSM regionally. 2S OPC gets involved for "incidents that were identified via a client complaint", in which case OPC "should liaise with the head of client services in order to check consistency of information between the complaints databases and incident databases"<sup>7</sup>
- WM: complaint management, incident management, control and oversight are under WM APAC Conduct & Control
- GM: Regional GM OPC owns complaints management for individual complaints on a case-by-case basis. GM Conduct is responsible to review overall compliance with the GM complaints framework
- GB: Except for HK and SG, Territory OPC owns oversight of individual complaints on a case-by-case basis, including the proper involvement of the Regional Business Head, Regional GB OPC and other regional stakeholders. For HK and SG, Regional GB OPC owns oversight of individual GB-related complaints on a case-by-case basis. Regional GB OPC oversees the overall complaint management reporting for GB across the region and have to be informed for Client Complaint concerning GB APAC
- Validate quality and accuracy of complaint details provided by MCC and Issue Owner(s)
- Update investigation and resolution details in the workflow system / Excel
- Perform ex-post check that complaint acknowledgement and response are sent within stipulated timeframes
- If a client complaint leads to incident discovery, create a historical incident (HI) record in the HI logging system and update the complaint workflow system with the HI reference
- If an existing incident in HI logging system contains information that encompasses the new complaint, then update the complaint workflow system with this HI reference
- Transpose relevant information (such as investigation and resolution details) from HI logging system to the complaint workflow system
- Responsible for preparing and presenting reports at an aggregated level for the business line's Permanent Control Committee ("PCC") or equivalent
- Contribute to the updating / development of training material as needed, *e.g.* complaints

<sup>6</sup> Refer to section 5, sub-heading *Recording in client complaint workflow system*

<sup>7</sup> 2S Client Complaint Handling policy, section 4.10



use cases

- Support APAC Transversal CCCO team to facilitate training for newcomers / refresher for existing employees
- Contribute to the identification and collection of improvement opportunities and monitor implementation of short-term tactical, and/or long-term strategic, action plans
- Escalate cases indicative of significant or systematic failures to Compliance
- Contribute complaints data, controlled by the CCCO, for the reporting via the quarterly client complaints dashboard produced by the Transversal CCCO Team

## Issue Owner<sup>8</sup>

- Responsible for investigating the issue that gave rise to a case or complaint, including gathering facts, analysing root causes, consulting experts for input to the action plan, and providing investigation information in a timely manner to the MCC
- Responsible for defining, agreeing and implementing a short-term, tactical plan for addressing the issue or complaint, and if relevant, the long-term, strategic improvement plan for root cause resolution of the issue or complaint

## Compliance

- Provide explicit Compliance advice to jointly determine classification of cases as needed
- 2<sup>nd</sup> line of defence ("LoD2") independent challenge and control of the end-to-end complaints management process, ensuring PIC guidelines are adhered to
- Accountable and responsible for developing Compliance-specific training material
- Consulted party to LoD1-developed client complaints training
- Share responsibility with OPC to perform training for newcomers and refresher for existing employees
- Responsible for preparing and presenting reports at aggregated level for the Territory Compliance Committee ("TCC")
- Review periodic territory complaint report for territory-specific regulatory requirements

## Business Line Conduct

- **GM: Responsible for investigating and resolving conduct-related client complaints workflow**
- Determines whether any action plan is required specifically in relation to conduct-related complaints (general awareness, improvement of the framework, additional training)
- Consult with MCCs to determine if complaints are to be recorded or reported with an underlying Conduct root cause. In case of disagreement, the Conduct Officer's decision holds
- Advisor to the business for queries on business line-specific Conduct-related complaints
- Inform Human Resources of complaints related to employee conduct

## APAC Conduct

- Advisor to the business for queries on Conduct-related complaints at regional level
- Receives reports of complaints process deadline misses
- Escalate potential Compliance or Conduct-related complaints to Territory Head of HR

## Business COO / CCCO and/or Territory COO

- Business COO / CCCO to ensure the appointment of MCCs within their remit
- Territory COO to appoint / delegate an appropriate MCC to manage the complaints process if a complaint cannot be clearly attributed to a specified business line
- Informed party and point of escalation for oversight and support at business line and/or

<sup>8</sup> Issue Owner could be any team (with oversight from their relevant team management) depending on the nature of the complaint, such as operational issues, level of service, compliance and fraud, tool/system and pricing



territory level for their respective scope

- Review and approve long-term improvement plans to ensure root cause resolution
- Authorised to escalate disagreements on complaints to, or act on behalf of, Territory Head (see next section) in keeping with obligations in respect of local regulations

## Regional / Territory Head<sup>9</sup>

- Ensure resources and procedures are in place for identifying complaints and defining the complaints management process
- Ensure training is provided to employees in contact with clients or receiving clients' requests, to ensure adequate complaints identification and process management
- Review complaint cases and/or action plans upon request and contribute to the complaints management process as appropriate
- Informed of, or approve as appropriate, settlements related to justified complaints

## Legal

- Provide legal advice when consulted by the MCC or Issue Owner(s)
- Consulted party to draft or review client communication or settlement agreement
- Monitor legal developments, making it possible to keep the complaint procedures in line with changes in local laws
- Advisor in the complaint process to be able to analyse the grounds for the complaint at a legal level and take the necessary precautions in drawing up a response
- Handle complaints in a pre-litigation situation

## APAC Transversal CCCO team

- Contact for queries related to this procedure or the complaints management process
- Maintenance of this policy
- Maintain list of MCCs
- Client Complaints Workflow Tool maintenance
- Client Complaints Workflow Tool access rights maintenance
- Produce quarterly complaints dashboard, coordinating with CCCOs / OPCs as necessary
- Develop and maintain LoD1 client complaints training - [except for 2S & WM where business line-specific client complaints training maintained centrally](#)

## 5. COMPLAINTS MANAGEMENT PROCESS

The same principles and details apply for all business lines, even if these appear under different headings within individual business line client complaint procedures.

### Phase 1 – Receipt, Classification, Recording and Acknowledgement

#### ***Entry points and channels to receive complaint***

A client may express their dissatisfaction through any channel available to them:

- orally or in writing to their usual points of contact (RM, Coverage, front office, CSM, senior management, middle office, back office, product specialist, *etc.*), wherever their location
- to the management of BNP Paribas, the business line or entity
- through a generic email / phone number / fax number / address
- through a dedicated Senior Independent Escalation Body / Alternative Dispute Resolution

<sup>9</sup> E.g., Regional or Local Business Head, Coverage Head, Site Head, Head of Territory, Territory CEO, Head of Location, *etc.*





If the client expression of dissatisfaction is received orally, the person receiving it should formalise it in written format to ensure traceability.

All staff must immediately inform their line manager and the applicable MCC or their delegate upon receipt of a potential complaint. If in doubt, staff should consult with their line manager or MCC. Staff should not personally handle potential complaints received. Failure to report potential complaints received may result in disciplinary action being taken against the relevant staff.

Where a client lodges a complaint through a third party, the MCC should insist on written authorisation issued by the client to allow BNPP to engage directly with the third party on behalf of the client in respect of the complaint.

Entry points, including the Senior Independent Escalation Body / Ombudsman contact details if applicable, need to be communicated to the client in clear and comprehensive language at no charge, through the following, where applicable:

- agreements and contractual documentation (e.g., MiFID II pack, onboarding pack / account opening booklet)
- local BNPP website
- information posted / distributed within the branch
- marketing / sales brochures
- other relevant documentation

### ***Classification as complaint***

Neither staff nor their line manager should filter cases by its perceived degree of severity or negativity of potential complaints. Classification of a complaint is the responsibility of the MCC, in consultation with Compliance and/or Legal, or Business COO / CCCO and/or Territory COO, and other stakeholders, as necessary.

Where a potential complaint relates to the behaviour of an individual, Compliance, APAC Conduct, and HR must be consulted before the individual in question is informed. This control is to ensure that neither the Bank, nor its employees, are subject to allegations of “tipping off” in the context of potential regulatory breaches, internal or external fraud, or financial crime.

Complaints and information relating thereto, including the identity of the complainant, should be treated as confidential and employees in possession of such information should not disclose the complaint to any other employee or person other than to their line manager, or relevant MCC, OPC, COO / CCCO, Compliance or Legal responsible persons.

In the case of classification as negative feedback, the MCC shall forward the case to the responsible RM / Coverage Team / CSM Team to manage according to the business line practice for handling feedback, to ensure that negative feedback cases are followed up on.

### ***Recording in client complaint workflow system***

A SharePoint workflow system, [APAC CIB Client Complaint Workflow Tool \(CCWT\)](#) has been developed for the logging and processing of all complaints in APAC, **except for 2S and WM by choice of their own, where different tools are used: 2SWorkflow and Excel respectively**. “Relevant client complaint workflow system”, or simply “workflow system”, refers generically. The workflow tool should be permanently available to the MCC, Compliance and teams responsible for permanent and

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<sup>10</sup> A Senior Independent Escalation Body / Ombudsman is an external party that is independent from the Bank, such as the Hong Kong Financial Dispute Resolution Centre, FDRC in HK, Monetary Authority of Singapore, or FIDReC in SG



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periodic controls.





**Some business line specificities:** GB: Complaints are logged in the territory where they are received, irrespective of the location of the impacted department, the root cause department, the location of the client or the relevant Coverage team / RM. For example, if a HK-based client raises a complaint through India, the complaint should be logged in India. GM: Complaints are logged in the location where the service is provided or the product is offered. 2S: A complaint received in one location may concern another (e.g., received by a GSM in a “buying location” which is different from the “booking location”). In this case, the complaint should be logged in the location where the service has been delivered (“booking location”)¹¹. WM: Cross-border complaints will be handled according to the booking center, e.g. for a Hong Kong / Thailand-based RM with account(s) booked with WM SG, it is considered as WM SG complaint. However, if the complaint concerns WM TH operation and staff, WM TH will mainly perform the role of fact-finding / investigation¹².

Any person who is the subject of a complaint should not be involved in the complaints management process for that particular or related complaint.

Upon classification as a complaint, the MCC is required to log the new case in the relevant client complaint workflow system as soon as possible, but in any event no later than 3 business days after classification or receipt of the complaint by BNPP. Supporting documents should be retained to validate complaint receipt date. OPC will review the case in the workflow system to ensure the quality, accuracy and completeness of information recorded.

## ***Acknowledgement of complaint***

The RM / Coverage Team / CSM Team or, in consultation the MCC, a more senior manager (e.g. COO / CCCO, Regional Business Head, Head of Territory, Territory CEO or Coverage Head, is responsible for providing acknowledgement of receipt of the complaint to the client within 10 business days (in the absence of local regulations imposing a stricter timeline or specific business line policies) unless a response is issued to the client within this timeframe.

This acknowledgement should confirm by when the client will receive a final response, or a progress update if a final response cannot be issued by the due date. The acknowledgement should reference date of complaint receipt and channel used, and the name and contact details of the person or team in charge of providing feedback to the client regarding the complaint. 2S: It is not recommended to refer to escalation points in the acknowledgement unless local regulation stipulates otherwise.

The MCC and Coverage team (if relevant) shall have oversight over all client responses. The MCC shall record the acknowledgement in the workflow system. OPC will perform an ex-post check on whether the acknowledgement has been issued within the stipulated timeframe.

## **Phase 2 – Investigation and Resolution**

### ***Identification of issue owner(s)***

The MCC shall appoint (an) issue owner(s) whose name(s) shall be recorded in the workflow system.

### ***Investigation***

The issue owner should analyse the complaint and its root causes through fact finding and provide investigation results to the respective OPC who will record it in the workflow system.

All complaints relating to internal or external fraud, employees misconduct, internal process and control systems, legal, regulatory or compliance issues must be investigated in conjunction with the

<sup>11</sup> 2S Client Complaint Handling policy, section 3.2.2

<sup>12</sup> WM APAC IN67 Customer Complaints Handling, section 2



Regional Investigation Team. Fraud should be reported to both Inspection Générale according to the [“Procedure for Reporting Incidents and Frauds to the Inspection Générale”](#) and Anti-Fraud team of RISK ORM according to the [“Group Global Policy for Preventing, Detecting and Managing Fraud”](#).

If a client complaint leads to incident discovery, LOD1 control & oversight of the failing party should record the HI in the HI logging system and follow the incident management process. The HI reference should be entered into the relevant client complaint workflow system and the investigation and resolution details recorded in the HI logging system should be updated in the client complaint workflow system. While incidents should be validated within 90 days, care should be taken to process complaints within 30 business days (2 months: [as standard for 2S](#), and for [complex cases for WM](#)) (or shorter depending on local regulations).

[It is important to ensure that any open position resulting from the operational incident is immediately identified and its consequences addressed without delay. Compensating a client to resolve a contentious complaint is considered to be an operational risk incident that has to be declared.](#)

## ***Resolution and action plans***

The **Issue Owner** is responsible for **defining, agreeing and implementing action plans**: short-term, tactically for addressing the issue or complaint, and if relevant, the long-term, strategic improvements for root cause resolution of the issue or complaint. The Issue Owner should consult with the MCC and OPC as necessary.

The **MCC** is responsible for **managing the client complaints process** through to resolution. If complaint relates to a service provider, the MCC should involve the designated officer from the service provider to contribute to the complaints management process.

**OPC independently ensures** both the complaints management process is followed properly, and that the action plan is delivered. OPC should receive evidence and documents supporting complaints investigation and resolution, and perform a quality review before validation in the complaints workflow system.

## **Phase 3 – Response & Closure**

### ***Settlement***

Business line management will, together with the Head of Territory, Territory COO, MCC and Legal (where appropriate), assess the results of the review or investigation and decide whether the complaint is justified. Redress may not involve financial compensation and may simply entail an apology. Where financial redress is appropriate, it should aim to provide the complainant with fair compensation for any acts or omissions for which BNPP was responsible. Approval of redress, including the amount of any financial settlement, if appropriate, lies with the Regional Business Head, who will inform the Head of Territory / Territory CEO.

### ***Communication to client***

Depending on the nature, root cause and impact of the complaint, the MCC will engage experts (including Compliance, Conduct, Legal, as required) to define the client communication in terms of:

- **Frequency**, respecting the limits set forth in the PIC policy
- **Content**, which may follow a standard template for straightforward complaints
- **Escalation**, if the client considers the response is not satisfactory

If the complaint has potential regulatory, legal or reputational implications, client communications should be reviewed by Territory Head of Compliance, Head of Territory and/or Legal prior to issuance. Responses shall follow the language chosen or used by the complainant.



With every intermediate<sup>13</sup> and/or final response issued, the MCC must record such action in the workflow system, and store all relevant documentation in a dedicated, secure shared drive. OPC will perform an ex-post check on whether client responses are sent within stipulated timeframes.

## Closure

The MCC closes the complaint in the complaints workflow system. The complaint can be closed if the client confirms the case closed, or the client did not contest the response or provided further indication of dissatisfaction within 30 business days (2S: 2 months) of issuance of the final response.

Where a verbal indication of acceptance by the client is received, written confirmation should be sought whenever possible. If the verbal acceptance is given over a recorded line, a record of the conversation should be retained according to each business line's requirements. A written audit trail noting the time, date, parties involved in the conversation, content relating to the verbal acceptance and, if possible, telephone number, should be provided to the MCC, and the MCC will share such details with the respective OPC for independent validation.

Where the complainant refuses to accept the proposals for closure of the complaint, the MCC and Compliance must be informed, and further actions determined on a case-by-case basis, involving the Regional Business Head as necessary.

After the case is closed, all relevant documentation should be stored in a dedicated, secure shared drive as an audit trail, including documentation related to:

- Initial complaint
- Analysis of the complaint and its root causes
- Composition of the team of resolution experts
- Resolution action plan
- All relevant communication sent to the client, with dates clearly identifiable
- All relevant communication received from the client, with receipt dates clearly identifiable
- Terms of the settlement agreement, if applicable

The archiving duration requirement (for both MiFID and non-MiFID complaints) is for 7 years from the date on which the complaint was resolved<sup>14</sup>.

## Escalation

The MCC, or LOD1 control & oversight, should report complaints deadline misses to the Regional Business COO, Territory COO, Head of Territory, Territory Head of Compliance and Regional Head of Conduct. Further, complaints with the following non-exhaustive set of characteristics should be escalated to the relevant 2<sup>nd</sup> line of defence:

- Referred to BNPP by a regulator, mediator or ombudsman
- Related to potential regulatory breaches
- Related to potential compliance risks (e.g. financial crime, fraud, etc.)
- Related to potential misconduct (e.g. compliance or regulatory breaches, leakage of confidential information, unfair pricing, misselling, conflicts of interests, or violation of clients' interests)
- Potential legal impact (e.g. client pursuing legal action against BNPP or a case under legal privilege)
- Potential reputational impacts on another BNPP location and/or entity
- If a complaint (including complaints addressed directly to members of the bank's executive committee) could have reputational repercussions on another location and/or Group entity,

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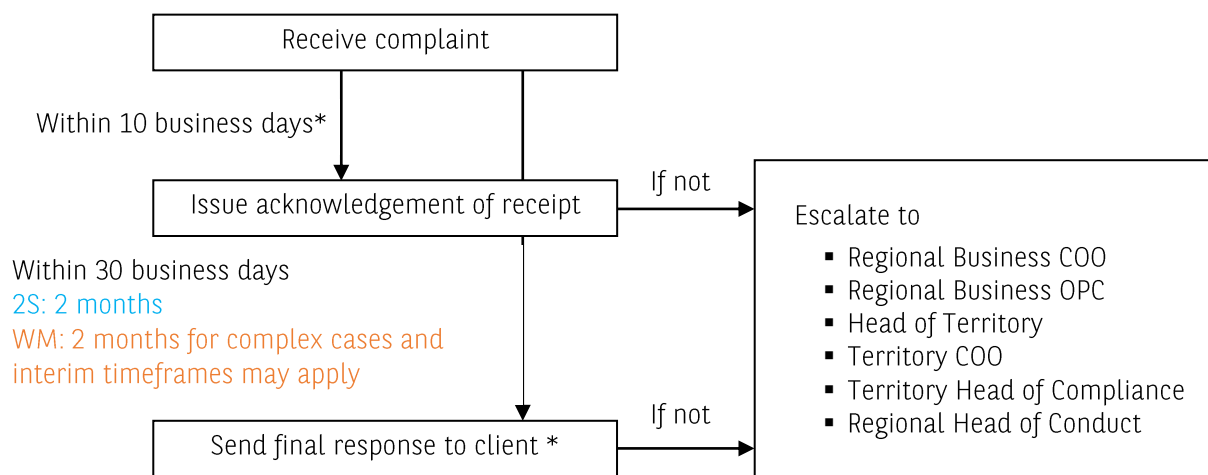
<sup>13</sup> Refer to Appendix 1: Territory-specific requirements on intermediate response

<sup>14</sup> Refer to Appendix 1: Territory-specific requirements on record keeping / retention



local compliance should escalate the information to the regional business line Compliance / protection of clients' interests' responsible officer (PICRO) and the local conduct correspondent

Additionally, complaints related to potential compliance risks or misconduct should also be escalated to the Regional Head of Conduct and Territory Head of HR.



\* Local regulations apply where these impose stricter timeframes

## 6. REPORTING AND GOVERNANCE

### Reporting

The following guidelines relate to the quantitative statistics and qualitative analysis to be presented at committees. The responsible party for the committee may customise the report according to the committee requirements as necessary.

- 1) Quantitative statistics
  - # of complaints in last five quarters across business lines / territories
  - # of communication deadline breaches
  - # of ageing complaints (with status "Open" over 30 or 60 days)
  - # of conduct-related complaints
  - # of complaints transformed into commercial gestures or incidents
- 2) Qualitative review per business line
  - Root causes
  - Analysis of business impact
  - Analysis of communication deadlines breaches and ageing complaints
  - Highlight of conduct-related complaints and unsubstantiated complaints
  - Cases representing significant risk or legal or regulatory issues
  - Cases indicative of significant or systematic failures

### Governance

Reporting should be made to the relevant territory/regional business line Permanent Control Committees (or equivalent, e.g. [Core for GM](#), [regional WM Asia Complaint Committee or Conduct & Control Committee for WM...](#)) and Territory Internal Control Committees (TICCs). Regional LOD1 control & oversight may reach out to Territory OPC or the relevant MCC in the preparation and presentation of such reports. Additionally, Conduct-related complaints shall be reported to the relevant business line Conduct & Ethics Boards and at the APAC Conduct Board.



Regional LOD1 control & oversight to check with relevant CCCO whether any additional reporting which may be required for complaints related to DMA activities, depending on the governance defined for respective business lines.

## 7. AWARENESS AND TRAINING

Business line and territory management must ensure training is provided to their employees who may be in contact with clients to enable employees to identify potential complaints received and duly follow the complaints management process. Training content should cover client complaints awareness and operational workflow, and include reference to use cases. Client complaints training should be classified as mandatory training with a minimum annual frequency. At the discretion of the business, and in consultation with the OPC and Compliance, client complaints training may be allocated to new joiners.

MCCs are responsible for defining the population of employees within their business line. For functions and ITO, the Transversal CCCO team is responsible for defining the training population.

## 8. CONTINUOUS IMPROVEMENT

Quality indicators should be used to assess the efficiency of the complaints process and improve the products, processes, services and organisational structures. In addition to the quantitative and qualitative reporting listed in the section titled "Reporting and Governance", the following further information could be considered:

- client surveys measuring client satisfaction with the management of their complaints
- analysis of complaints by theme
- analysis of complaints by reason of dissatisfaction
- deep dive and trend analysis of root causes

Weaknesses or improvement opportunities should be addressed through specific self-identified action plans (SIAPs) to be tracked at relevant governance committees.

## 9. EXTERNAL WEBSITES FOR APAC

All external websites accessible by clients should include contact details for clients to raise potential complaints. Specific requirements on what kind of contact details should be provided are subject to local regulations. Please refer to Appendix 1 for the local regulations of respective Territory.



## APPENDICES

### APPENDIX 1: TERRITORY-SPECIFIC REQUIREMENTS

Employees should always apply local regulations and standards if they are more restrictive than the policy. The following pages provide a summary of the territory-specific requirements.

For more details and updates on territory-specific requirements, contact your local compliance officer or refer to your local complaints document.

#### **Australia and New Zealand**

##### Local specific requirements

##### **Client Entry points**

Clients can lodge complaints by contacting:

Relationship Manager,

Desk Head or

BNP Paribas contact person.

Alternatively, the client contacts our complaints handling team via email and phone:

[dl.au.client.complaints@au.bnpparibas.com](mailto:dl.au.client.complaints@au.bnpparibas.com)

+61 2 9619 6333

##### **Complaints Processing Deadlines**

Client complaints need to be acknowledged within 24 hours from when the complaint was received. Acknowledgement must be sent in writing and email is acceptable.

##### **Response**

A final response is required to be provided to the complainant in writing, within a maximum timeframe of 30 calendar days after the date the complaint was received by BNP Paribas.

##### **Regulator**

Australian Securities Investment Commission (ASIC) regulates registered companies, financial markets, and providers of financial services and credit services.

ASIC has requirements for client complaints, defined under:

Regulatory Guide 271 Internal Dispute Resolution (RG271) (including reporting obligations);

Regulatory Guide 274 Product Design and Distribution Obligations (RG274); and

Regulatory Guide 277 Consumer Remediation (RG277).

ASIC requirements also mandate financial firms to be a member of the Australian Financial Complaints Authority (AFCA).

AFCA is Australia's external dispute resolution body established for consumers (retail and small business (< 100 staff)) who are unable to resolve complaints with financial firms.



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## China

### Local specific requirements

### Entry points and channels

Channels for complaint handling, such as a compliant hotline, Internet address, and mailing address, shall be published in conspicuous positions of bank business premises and official websites. A complaint hotline must be set up.

Clients can refer to below contact details:

- Client's assigned Relationship Manager, Desk Head; or
- BNPP China compliance department via:
  - Complaint Hotline: +86 21 2896 2529 (9:00am-6:00pm, Monday to Friday)
  - Complaint E-mail: PRC\_Complaints@asia.bnpparibas.com
  - Complaint Correspondence:  
BNP Paribas (China) Limited-Compliance Department  
17/F, 479 Lujiazui Ring Road, PUDONG New District,  
Shanghai, P.R.C.

Upon receiving complaints via this channel, China Compliance will escalate to management and forward to the relevant business MCC for their handling as appropriate who will initiate the client complaint handling process.

### Complaints processing deadlines

If a final response to the complainant can be given within 10 business days from the date of receipt of the complaint, the acknowledgement may be combined with the final response.

In other cases, either one of the following responses must be given to the complainant in writing within **15 days** from the date of receipt of the Complaint:

- a final response which either accepts the Complaint (and offers redress where appropriate) or offers redress without accepting the Complaint or rejects the Complaint and gives reasons for doing so;
- If the final decision is to either offer redress without accepting the Complaint or reject the Complaint, the subject Complaint is not deemed as effective Complaint.;
- an intermediate response explaining why we are not in a position to give a final response, giving reasons for the delay and indicating when a final response can be expected;

For complex cases, the time limit for such responses may be extended to 30 days and another 30 days for especially complex circumstances or for other special reasons with approval of senior management (CEO or COO).

### Record keeping

Records will be kept by the bank for a minimum period of 7 years from the date of receipt of the complaint.





### **Handling complaints referred by regulators etc.**

Complaints made directly to market regulators and authorities and other complaint handling organisations will be handled in accordance with this procedure.

### **Local regulatory reporting**

- If the local procedure has any changes, the new version should be submitted to NAFR within 10 business days;
- If there is any change to the list of responsible persons for complaint management, the Bank should submit the updated version to NAFR within 5 business days.
- If there is any complaint referred by regulators to the Bank, a report is to be submitted to NAFR before 10th of every month on the handling progress;
- Annual complaint report submitted by Jan 31<sup>st</sup> every year;
- In case of a major consumer complaint, the relevant situation shall be reported to the NAFR through the NAFR reporting system within 24 hours from the time of its occurrence. If new circumstances arise or additional information is required, the report shall be continued within 24 hours and no later than 72 hours. Definition for major consumer complaints shall include the following:
  - 1) consumer complaints arising from major natural disasters, safety accidents, and public health incidents, among others;
  - 2) mass complaints of common consumer complaints filed by 20 or more complainants by interviews;
  - 3) other major complaints recognized by the NAFR and its local offices.





## Hong Kong

### Local specific requirements

#### **Classification as complaint**

Complaints may be made anonymously. Note that clients may lodge their complaints through third parties, in such cases, clients should issue a letter to BNPP authorizing their third parties to handle the complaint on their behalf.

This Clients Complaints policy should not be applied to trading or settlement disputes that are dealt with in the normal course of business. Notwithstanding this, if there is a reasonable expectation that the dispute will prove irresolvable in the normal course of business or is likely to become complaint, this policy should be applied and the client is encouraged to express their concerns in writing.

#### **Entry points and channels**

Clients can refer to below contact details:

- Client's assigned Relationship Manager, Desk Head; or
- Complaint Handling Officer (published on HKMA/SFC Websites)

In case where a client wishes to make a complaint to the Complaint Handling Officer, staff should advise the client to contact the designated official contacts published on the HKMA/SFC websites. Contacts of the Complaint Handling Officers as published on [HKMA/SFC websites](#).

Upon receiving complaints via this channel, HK Compliance will escalate to management and forward to the relevant business MCC for their handling as appropriate who will initiate the client complaint handling process.

#### **Handling complaints referred by regulators etc.**

Complaints made directly to market regulators and authorities and other complaint handling organisations will be handled in accordance with this procedure.

Complaints referred by the HKMA must be investigated and results of the investigations, together with copies of all responses to and correspondences with the complainant, will be submitted by Compliance to the HKMA, normally within 30 days from the date of receipt of the letter from the HKMA referring the complaint.

#### **Complaints handling process and deadlines**

Stipulated under Section 13 of the Code of Banking Practice and Section 2.3 of the Hong Kong Monetary Authority ("HKMA") Supervisory Policy Manual on Complaint Handling Procedures, complaint procedures should be made available to clients and other interested parties. In view of this, staff members must provide Appendix A which summarises our complaint handling procedures, upon clients' request or when acknowledging clients' complaints.

Written acknowledgement must be sent to the complainant within **7 calendar days** upon receipt of the complaint. Appendix B outlines a suggested template for this acknowledgement.

If a final response to the complainant can be given within 7 calendar days from the date of receipt of the complaint, the acknowledgement may be combined with the final response.



In other cases, either one of the following responses must be given to the complainant in writing within **30 calendar days** from the date of receipt of the complaint:

- a final response
- that set outs:
  - the allegation(s) or concern(s) raised by the complainant;
  - results of the AI's follow-up including investigation of the complaint;
  - whether the bank (i) accepts the matters complained (and offers redress where appropriate); (ii) offers redress without accepting the matters complained; or (iii) rejects the matters complained and gives reasons for doing so; and
  - that in the event the complainant can provide to the bank new, relevant and objective information supporting the allegation(s), the complaint would be re-evaluated. (If considered more appropriate this particular point could be included as an additional note rather than in the body of the final response.)
- Note: For complainants who are individuals, sole proprietors or small enterprises<sup>15</sup>, they should be informed of their rights to make a complaint to the FDRC. Suggested wording to be incorporated in the final response: "We are a member of the Financial Dispute Resolution Scheme ("FDRS") for managing and resolving disputes administered by the Financial Dispute Resolution Centre Limited ("FDRC"). Please be reminded that if you are not satisfied with our reply above, you have right to refer your complaint to the FDRC.";
- an intermediate response explaining why we are not in a position to give a final response, giving reasons for the delay and indicating when a final response will be expected;

For complex cases, where resolution of a complaint is unlikely to be done within 60 calendar days of receipt, Compliance should be consulted in order to consider whether such has implications under local regulations.

## Review mechanism

If the complainant raises further enquiries and/or dissatisfaction about the complaint handling result, the AI concerned should review the complainant's enquiries to see if there is new objective information to support the allegation(s) and provide further response to the complainant within reasonable time.

## Resolution of complaints

Complaints logged in the workflow tool involving 'Legal & Compliance' will require the Legal or Compliance will be consulted. For legal related matters, OPC will inform the Legal department to resolve the complaint.

Stipulated under Section 13 of the Code of Banking Practice and Section 2.3.2 of the Hong Kong Monetary Authority ("HKMA") Supervisory Policy Manual on Complaint Handling Procedures, complaint procedures should be made available to clients and other interested parties.

Responses and correspondence with clients shall be made in the language chosen or used (Chinese

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<sup>15</sup> Implementation of the Terms of Reference for Financial Dispute Resolution Centre in relation to Financial Dispute Resolution Scheme for Small Enterprises is effective from 1 July 2018.

Small Enterprise means a limited company or a partnership, and in accordance with its latest financial year end statement has: (1) an annual turnover not exceeding HK\$50 million; and (2) gross assets not exceeding HK\$50 million; and (3) not more than 50 employees in Hong Kong.

If a limited company is a subsidiary company or a holding company (in accordance with the definitions used in the Companies Ordinance (Cap. 622)) within a group, the group's consolidated figures will be used. For overseas incorporated enterprises, same criteria apply.



or English) in accordance with the language of the complaint.

Where the complainant refuses to accept the proposal for closure of the complaint, the Complaint Handling Officer and the Métier Complaints Contact must be informed and further actions are to be determined on a case by case basis, including but not limited to the submission/referral of such complaint to the Treasury Markets Association ("TMA") (for financial instruments covered by the TMA Code of Conduct and Practice only).

## Ombudsman - Financial dispute resolution centre ("FDRC")

Complainant should be informed of their right to go to the FDRC to resolve the complaint if the complaint concerned is related to services provided to individual client, sole proprietor or small enterprise and is of monetary nature.

The maximum claimable amount under the FDRS is HKD 1,000,000.



The subject matter of a complaint should be properly reviewed before responding to the complainant. When the subject matter of the complaint relates to other clients or raises issues of broader concern, steps should be taken to investigate and remedy such issues, notwithstanding that the other clients may not have filed complaints with BNPP and/or the FDRC.

The FDRC service is offered at a charge to both the complainant and financial institutions under a "pay-as-you-use" principle. Please refer to the FDRC's rules and procedures for the fee schedule and other matters in relation to the operation of FDRC.

Staff should make honest and diligent disclosure before mediators and/or arbitrators in connection with the FDRC and render all reasonable assistance to the FDRS.

Any determination or settlement of a complaint in connection with the FDRS (including the details of the determination or settlement) should be provided to the Securities and Futures Commission ("SFC") if so requested by the SFC. BNPP may request that the FDRC provides on our behalf certain specified information directly to the SFC including the Agreement to Mediate, the Mediated Settlement Agreement, the Mediation Certificate, the Notice to Arbitrate and the Arbitral Award.

## Response to client

<p>APPENDIX A</p> <p>SUMMARY OF OUR COMPLAINT HANDLING PROCEDURES</p> <p></p> <p>HK_Appendix A Summary Complaint I</p>	<p>APPENDIX B</p> <p>SUGGESTED TEMPLATE FOR ACKNOWLEDGING COMPLAINTS</p> <p></p> <p>HK_Appendix B Acknowledgment of C</p>
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## India

### Local specific requirements

#### **1. BNPP India bank branch**

##### **Entry points and channels**

The Bank shall prominently display at the branches:

- a. The names of the officials who can be contacted for redressal of complaints, together with their direct telephone number, fax number, complete address (not Post Box No.) and e-mail address, etc., for proper and timely contact by the customers and for enhancing the effectiveness of the redressal machinery;
- b. The name and other details of the concerned Nodal Officer appointed under the "Reserve Bank - Integrated Ombudsman Scheme, 2021 and as per Reserve bank of India circular on Strengthening of Grievance Redress Mechanism in Banks dated 27th January 2021".

The Bank shall also display on the Bank's website:

- a. The name, complete address, telephone / fax number, email address, etc., of the Principal Nodal Officer prominently in the portal of the bank preferably on the first page of the web-site so that the aggrieved customer can approach the bank with a sense of satisfaction that she / he has been attended at a senior level.
- b. The names and other details of the officials at their Head Office / Regional Offices/Zonal Offices who can be contacted for redressal of complaints including the names of the Nodal Officers / Principal Nodal Officers;
- c. The names and other details of the Bank's CMD / CEO and also Line Functioning Heads for various operations to enable customers to approach them in case of need, if necessary.

##### **Complaints/suggestions box**

Complaints/suggestions box should be provided at each office of the bank and compliance should be monitored by the branch manager. Further, at every office of the bank a notice requesting the customers to meet the branch manager may be displayed regarding grievances, if the grievances remain unredressed.

##### **Complaint book/register**

Complaint book with perforated copies in each set has to be provided, so designed as to instantly provide an acknowledgement to the customers and an intimation to the Métier Complaint Contact.

A copy of the complaint is required to be forwarded to the concerned Métier Complaint Contact along with the remark of the Branch Manager within a time frame.

All bank's branches should maintain a separate complaints register for entering all the complaints/grievances received by them directly or through the Central Office. These registers should be maintained irrespective of the fact whether a complaint is received or not in the past.

The complaints registers maintained by branches should be scrutinised by the concerned Manager from the Central Office during his periodical visit to the branches and his observations/comments recorded in the relative visit reports.



## Complaint form

A complaint form, along with the name of the Principal Nodal Officer for complaint redressal, should be provided in the homepage of the Bank's website to facilitate complaint submission by customers.

The complaint form should also indicate that the first point for redressal of complaints is the bank itself and that complainants may approach the Banking Ombudsman only if the complaint is not resolved at the bank level within a month.

Similar information shall be displayed in the boards put up in all the bank branches to indicate the name and address of the Banking Ombudsman. In addition, the name, address and telephone numbers of the Principal Nodal Officer to whom complaints can be addressed shall also be given prominently.

## Complaints processing deadlines

A final response / redressal to the complainant is expected to be sent within 30 days. Further, it is also necessary that the customer is made aware of his rights to approach the concerned Banking Ombudsman in case he is not satisfied with the bank's response. As such, in the final letter sent to the customer regarding redressal of the complaint the Bank should indicate that the complainant can also approach the concerned Banking Ombudsman. The details of the concerned Banking Ombudsman should also be included in the letter. The response shall have the following minimum characteristics:

- It must be in writing (e-mail is acceptable);
- It must be in English language

As a requirement from the Reserve Bank of India, where the complaints are not redressed within one month, the concerned branch should forward a copy of the same to the concerned Nodal Officer under the Banking Ombudsman Scheme and keep him updated regarding the status of the complaint. This would enable the Nodal Officer to deal with any reference received from the Banking Ombudsman regarding the complaint more effectively.

As per the requirement of the securities market regulator –SEBI (Securities and Exchange Board of India), the Merchant Bankers, Brokers, Custodians, DDPs are required to Publish Investor Charter and Disclosure of Complaints on their websites. The complaints details must be updated monthly. The charter and format have been uploaded on the BNP Paribas India Website, by BPSS team and Investment Banking Teams, respectively through Brand and Communications team.

## Principal Nodal Officer

Under the Banking Ombudsman Scheme, a Principal Nodal Officer is to be appointed. The Principal Nodal Officer should be of a sufficiently senior level, not below the rank of a General Manager. The Principal Nodal Officer shall be updated of the status of the complaint to able to deal with any reference received from the Banking Ombudsman regarding the complaint in question.

The name and address of the Principal Nodal Officer may also be forwarded to the Chief General Manager, Consumer Education and Protection Department, Reserve Bank of India, Central Office, 1st Floor, Amar Building, Sir P.M. Road, Mumbai - 400 001

In BNP Paribas India, the Principal Nodal Officer is the Head of Branch Operations.

## Disclosure of complaints

The Bank shall disclose the brief details regarding the number of complaints along with their financial results. This statement should include all the complaints received at all branches in India.

As per RBI guidelines, the Bank shall disclose the following brief details along with their financial



results:

**Summary information on complaints received by the bank from customers  
and from the OBOs**

Sr. No		Particulars	Previous year	Current year
Complaints received by the bank from its customers				
1.		Number of complaints pending at beginning of the year		
2.		Number of complaints received during the year		
3.		Number of complaints disposed during the year		
	3.1	Of which, number of complaints rejected by the bank		
4.		Number of complaints pending at the end of the year		
Maintainable complaints received by the bank from OBOs				
5.		Number of maintainable complaints received by the bank from OBOs		
	5.1.	Of 5, number of complaints resolved in favour of the bank by BOs		
	5.2	Of 5, number of complaints resolved through conciliation/mediation/advisories issued by BOs		
	5.3	Of 5, number of complaints resolved after passing of Awards by BOs against the bank		
6.		Number of Awards unimplemented within the stipulated time (other than those appealed)		

Note: Maintainable complaints refer to complaints on the grounds specifically mentioned in BO Scheme 2006 and covered within the ambit of the Scheme.

**Top five grounds of complaints received by the bank from customers**

Grounds of complaints, (i.e. complaints relating to)	Number of complaints pending at the beginning of the year	Number of complaints received during the year	% increase/decrease in the number of complaints received over the previous year	Number of complaints pending at the end of the year	Of 5, number of complaints pending beyond 30 days
1	2	3	4	5	6
Current Year					
Ground - 1					
Ground - 2					
Ground - 3					
Ground - 4					



Ground - 5					
Others					
Total					
Previous Year					
Ground - 1					
Ground - 2					
Ground - 3					
Ground - 4					
Ground - 5					
Others					
Total					

Note: The master list for identifying the grounds of complaints is provided in [Appendix 1](#).

The bank shall place the detailed statement of complaints and its analysis on their web-site for information of the general public at the end of each financial year.

## Reporting of complaints

The Reserve Bank of India requires reporting of quarterly / annual data of complaints through CIMS – centralised information management system: [https://www.rbi.org.in/scripts/BS\\_Listofallreturns.aspx](https://www.rbi.org.in/scripts/BS_Listofallreturns.aspx)

211	Return on Complaints	Data on customer complaints	Quarterly & Annual	CEPD	All Commercial Banks	<a href="#">Email Intimation to Banks</a>	21 kb	CIMS
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**The template prescribed by SEBI for updating complaints details on a monthly basis on the website is as follows.**





## A. Data for the Month ending -

S.No	Received from	Pending at the end of the last month	Received during the month	Resolved during the month*	Total Pending at the end of month **	Complaints Pending > 1 month	Average Resolution time^ (in days)
1	Directly from Investors						
2	SEBI (SCORES)						
3	Stock Exchanges (if relevant)						
4	Other Sources (if any)						
5	<b>Grand Total</b>						

## B. Trend of Monthly disposal of complaints for the Financial Year-

SN	Month	Carried forward from previous month	Received during the month	Resolved during the month *	Pending at the end of the month **
1	April 2021				
2	May 2021				
	.....				
12	March 2022				
	<b>Grand Total</b>				

\* Inclusive of complaints of previous months resolved in the current month.

\*\* Inclusive of complaints pending as on the last day of the month.

^ Average Resolution time is the sum total of time taken to resolve each complaint in days, in the current month divided by total number of complaints resolved in the current month.

## C. Trend of Annual (FY) disposal of complaints (For 3 years on rolling basis)-

SNo	Year	Carried forward from previous year	Received during the year	Resolved during the year	Pending at the end of the year
1	2019-20				
2	2020-21				
3	2021-22				
	<b>Grand Total</b>				

## 2. BNP Paribas Securities India Private Limited ("SIPL")

Below are the local regulatory requirements:

- SIPL must have a complaints e-mail id for customer complaints
- SIPL shall display the link to the complaints e-mail id on its website
- SIPL shall display the customer complaints e-mail id on the contract notes issued to the clients for the transactions executed for them
- SIPL shall display the customer complaints e-mail id on the periodic statement of accounts issued to the clients for the transactions executed for them.
- SIPL shall display the mandatory contact information for investor grievances / complaints on its notice board near the entrance to its registered office, where the trading terminals are located.





- SIPL shall maintain a Client Complaints Register as per local regulatory requirements. The internal Client Complaints Log book contains all the required fields
- SCORES portal: The Securities and Exchange Board of India ("SEBI") has a system for processing of complaints through the SEBI Complaints Redress System ("SCORES") portal (<http://scores.gov.in>) – a web based centralized system to capture investor complaints against SEBI registered market participants. Any complaints relating to the stockbroking business will be forwarded to SIPL through the platforms of the respective stock exchanges. Any complaints received on the SEBI SCORES platform must be resolved within a reasonable period, but not later than 15 calendar days.
- SIPL must submit the details of complaints received on a monthly basis, to NSE
- SIPL must publish the below information on its webpage:
  - SEBI Investor Charter for stockbrokers
  - Basic details such as SEBI registration number, registered address of Head Office and branches if any
  - Escalation Matrix
  - Names and contact details of Key Managerial Personnel including the Compliance Officer
  - Procedures for opening an account, filing a complaint on designated Email ID, and finding out the status of the complaint, etc.
- SEBI reduced the timeline for redressal of investor grievances by various market participants, to 21 calendar days. The SIPL local L3 complaints policy has a more stringent timeline for redressal of investor complaints i.e. within 15 calendar days
- SEBI has streamlined the existing dispute resolution mechanism in the Indian securities market by establishing a common Online Dispute Resolution Portal ("ODR Portal"). This portal will facilitate online arbitration and conciliation for disputes between market participants and their clients.
- SIPL must display the investor complaints data on its website in the below format

## Investor complaints data - monthly disclosure

Data for the month ending 31st July 2023

Sr. no.	Received From	Carried forward from previous month	Received during the month	Resolved*	Total Pending**	Pending at the end of the month (Pending for <= 3 months)	Pending at the end of the month (Pending for > 3 months)	Average Resolution time *** (in days)
1	Directly from investors	0	0	0	0	0	0	0
2	SEBI (SCORES)	0	0	0	0	0	0	0
3	Stock exchanges	0	0	0	0	0	0	0
4	Other sources (if any)	0	0	0	0	0	0	0
	<b>Grand Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

\*Inclusive of complaints of previous months resolved in the current month, if any.

\*\*Inclusive of complaints pending as on the last day of the month, if any.

\*\*\*Average Resolution time is the sum total of time taken to resolve each complaint in days, in the current month divided by total number of complaints resolved in the current month.



## Trend of monthly disposal of client complaints

Sr. No.	Month	Carried forward from previous month	Received	Resolved*	Pending**
1	April, 2023	0	0	0	0
2	May, 2023	0	0	0	0
3	June, 2023	0	0	0	0
4	July, 2023	0	0	0	0
	Grand Total	0	0	0	0

\*Inclusive of complaints of previous months resolved in the current month.

\*\*Inclusive of complaints pending as on the last day of the month.

## Trend of annual disposal of client complaints

SN	Year	Carried forward from previous year	Received during the year	Resolved during the year*	Pending at the end of the year**
1	2017-18	0	0	0	0
2	2018-19	0	0	0	0
3	2019-20	0	1	1	0
4	2020-21	0	0	0	0
5	2021-22	0	0	0	0
6	2022-23	0	0	0	0

\* Inclusive of complaints of previous years resolved in the current year

\*\* Inclusive of complaints pending as on the last day of the year



## Indonesia

### Local specific requirements

#### Complaints processing deadlines

The following timeframes shall prevail for the Complaints Handling:

- Verbal Complaints must be followed up on and handled within 5 business days. If the complaint cannot be resolved within 5 business days, consumer is to alter the complaint to written; or
- Written Complaints must be followed up on and handled within 20 business days, with extension of 20 business days available. If the Bank needs more time to resolve the complaint, Client must be notified the extension before the first 20 business days period is ended.

#### Objection of response

Consumers are entitled to object the relevant response from the Bank by submitting new documents and the objection must be settled within 20 business days.

#### Dispute resolution

In the event of Consumers and/or Consumer Representatives are dissatisfied and reject the response offered by the Bank, then the Complaint will be officially designated as a dispute and the following conditions will apply:

1. The Bank will be obliged to inform Consumers of both the relevant judicial and alternative dispute settlement mechanisms;
2. The dispute must be settled in accordance with the dispute settlement clause set out in the underlying agreement and/or document for the financial transaction in question; and
3. The alternative dispute settlement mechanism must be pursued through the listed Alternative Dispute Resolution Institutions in accordance with Regulation of the OJK No. 61/POJK.07/2020 on Alternative Dispute Resolution Institutions for the Financial Services Sector.

#### Local regulatory reporting

PT Bank BNP Paribas Indonesia (BNPPI) shall report the customer complaint handling and resolution in quarterly basis (with the exception on Fund Transfer) to the Otoritas Jasa Keuangan (OJK) and Bank Indonesia (BI) and the reports are:

1. Customer Complaint Handling and Resolution report to Bank Indonesia via Antasena;
2. Customer Complaint Handling and Resolution report on Cash and Withdrawal to BI (nil report as BNPPI does not provide cash services). The submission is through mailing; ;
3. Customer Complaint Handling and Resolution report to OJK via SIPEDULI platform ;
4. Customer Complaint Handling and Resolution report on Fund Transfer via mailing. The submission for this report is monthly basis.

The Bank is also required to arrange the Annual Publication on Complaint Handling, which state the number of complaints handled by the Bank per completion status, using Appendix I of SEOJK No.17/SEOJK.07/2018.

In reference to article 26 of regulation no 18/POJK.07/2018 concerning Consumer Complaint Handling in Financial Services on the restriction for the appointment of compliance as Complaint Handling function, the tasks associated with complaint handling including the reporting for internal purposes shall not be performed by Compliance. In the event a report is required for internal committee purposes, compliance will compile the report produced by the complaint handling unit / complaint handling owner and presented to the committee.

PT. BNP Paribas Sekuritas Indonesia

- 1) The Company and/or customer will input the complaints, its handling and resolution via Aplikasi Portal Perlindungan Konsumen/Consumer Protection Portal (APPK) of OJK.
- 2) Customer Complaint Handling and Resolution report to OJK via SIPEDULI platform on quarterly basis, at the latest on the 10th of the following month after each quarter.



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## Japan

### BNP Paribas Securities (Japan) Limited

Local specific requirements

Please refer to the below local policies.

- [My Procedures \(by CIB\) - CPLL3-01030-EN-Rules regarding the Handling of Client Complaints \(AE\)](#)
- [My Procedures \(by CIB\) - CPLL3-01053-EN-Rules regarding Dispute Settlement \(SE\)](#)

### BNP Paribas, Tokyo Branch

Local specific requirements

Please refer to the below local policies.

- [My Procedures \(by CIB\) - CPLL3-01030-EN-Rules regarding the Handling of Client Complaints \(AE\)](#)
- [My Procedures \(by CIB\) - CPLL3-01052-EN-Rules on Handling of Resolution and Settlement of Disputes Etc](#)



## Malaysia

### Local specific requirements

#### Accessibility

BNP Paribas Malaysia must publish information on how to make a complaint, and its complaint handling procedures, and make the procedures easily available to customers. This information must at least be displayed prominently in BNP Paribas Malaysia premises and website.

Details of the complaints unit (including the name, department, dedicated customer service telephone number and e-mail address of its dedicated officers) must be displayed in BNP Paribas Malaysia's website. Bank Negara Malaysia's website will also display the details of the complaints unit of each financial service provider.

Any changes to the details of the complaints unit must be updated soonest. In this regard, in addition to updating its website, BNP Paribas Malaysia is also required to inform Bank Negara Malaysia (BNM) of any changes to the details of the complaints unit at the following address:

Pengarah  
Jabatan Komunikasi Korporat  
Bank Negara Malaysia  
P.O. Box 10922  
50929 Kuala Lumpur

Client Services shall ensure that the relevant information as outlined above is made available and updated as and when required. As the single point of contact for BNP Paribas Malaysia on BNM's website, Client Services will help to disseminate the complaints received to Métier Complaint Contact ("MCC") for their onward actions. MCC is required to work together with OPC to ensure that the complaint received is being managed as per the process stated in this policy. Compliance shall ensure that the accessibility requirements as laid down by BNM are fulfilled.

#### Complaints processing deadlines

Management and processing of complaints must be sufficiently effective to ensure that response times do not exceed the prescribed timelines.

Where possible, written acknowledgement should be sent by the Métier Complaints Contact to the complainant within **5 working days** of receipt of the complaint. The response should acknowledge receipt of their complaint and summarise when the complainant will receive a progress update.

As per BNM, the customer must be informed of the decision no later than **14 days** from the date of receipt of the complaint. However, if the case is complicated or involves complex issues that require further investigation, BNP Paribas must inform the customer in writing on reasons for the delay and the need for additional time to resolve the complaint. In total, a decision on the complaint must be conveyed to the customer not later than **30 days** from the date the complaint was first lodged.

Where a decision cannot be made within the 30 days due to the need to obtain material information or document from a third party (e.g., medical, forensic or police investigation reports), BNP Paribas must follow up with the relevant third party for the information / document required, and provide updates on the progress of the case to the customer at least on a monthly basis. Once complete information / document are received, the financial service provider must finalise its investigation and inform the customer of its decision within **14 days**.



For PayNet-related complaints, BNP Paribas Malaysia shall investigate and resolve customer queries and complaints in accordance with any BNM guidelines as well as the Retail Operational Procedures issued by PayNet. Where the Retail Operational Procedures stipulate more stringent requirements or higher standards than existing BNM guidelines, BNP Paribas Malaysia is required to meet the higher standards. Written acknowledgement should be sent by the Métier Complaints Contact to the complainant within the stipulated timeline stated in the relevant BNM guidelines or the Retail Operational Procedures. The response should acknowledge receipt of the complaint and summarise when the complainant will receive a progress update.

## Record keeping

Under the Malaysia Limitation Act 1953, the requirement is to retain documents for duration of 6 to 7 retention years.

## Local regulatory reporting

### i) Bank Negara Malaysia

BNM requires all financial institutions to report the number of client complaints on a monthly basis as part of the Operational Risk / Orion reporting, and on a semi-annual basis as part of a specific reporting dedicated to client complaints.

For the purpose of Orion Reporting, BNM requires financial institutions to classify client complaints into 13 different categories. Products, Fees & Charges, Operations, Services and Sales & Marketing, as detailed in the below table:

BNM Category	BNM Definition of Category
Terms and Conditions	Complaints relating to any part of a RE's terms and conditions of products and services, including: i) Provisions in the contract do not take financial consumers' interests into account; ii) Unfair exclusion or limitation of the RE's liability for its negligence or failure to carry out instructions or errors; iii) Unfair exclusion or limitation of financial consumers' right to take legal action in the event of non-performance or inadequate performance of the RE's contractual obligations; iv) Termination of any financial agreements unilaterally by the RE without any valid reason or reasonable notice to financial consumers; or Contract terms result in significant imbalance to the detriment of the financial consumer.
Fees & Charges	Complaints relating to the fees and charges imposed on financial consumers, including: i) High or excessive fees and charges, including legal fees; ii) Non-disclosure of fees and charges (includes non-disclosure of variations to fees and charges); iii) Wrongful or inaccurate fees and charges imposed in relation to any product or service; or iv) Fees charged by a merchant without consent of the financial consumers.



Operational	Complaints relating to any part of the RE's operations including: i) Freezing/opening/closing of accounts; ii) Loss of banks documents/security documents/registration cards; iii) Proceeds not received, where RE need to refund the balance/excess of money to customer; iv) Difficulty of reversing transactions; or v) Refuse to provide security documents/registration cards.
Disputes	Complaints relating to the following: i) Dispute on billing transactions; ii) Dispute on interest and outstanding balance; iii) Dispute on redemption sum or loan settlement; iv) Dispute on fixed deposit placements; v) Dispute on cheque related matters; vi) Dispute on CCRIS report; or vii) Dispute on non-receipt of bank documents.
Debt Recovery issues	Complaints relating to any parts of RE's collection activities including: i) Unfair practice of going after guarantor instead of borrower; ii) Harassment by reposessor/collection staff/outsourced debt collection agent or any authorised representative; iii) Dispute on foreclosure/ repossession action; or iv) Bankruptcy related issues.
Customer Services	Complaints relating to any part of a RE's customer service including: i) Delay in responding or no response to financial consumers' queries or requests; ii) Delay in clearing or processing disbursement or release of documents; iii) Unprofessional or rude behaviour of staff or authorised representative; iv) Closing/relocation of branches; v) Insufficient / inaccurate information; or vi) Non-display of consumer related information at branch / e-channels.



Marketing and Sales	<p>Complaints relating to any part of a RE's marketing and sales process, including:</p> <ul style="list-style-type: none"> <li>i) Misrepresentation or misleading statements in advertisements, brochures, illustrations or any other materials used for marketing and sales purposes;</li> <li>ii) Misrepresentation or mis-selling by staff of the RE or any of its authorised representatives;</li> <li>iii) Forced selling, including compulsory product bundling;</li> <li>iv) Wrongful advice or information during sales process or at any time prior to the purchase of a banking product or service;</li> <li>v) Failure to provide financial consumer with required information and documents pertaining to the product and services offered by the RE at the point of sales;</li> <li>vi) Failure to request required documents pertaining to the product and services applications from financial consumers; or</li> <li>vii) Failure to conduct suitability assessment, where the suitability assessment refers to an exercise carried out by the RE. This exercise would entail the RE gathering necessary information in order to form a reasonable basis for the RE's recommendation</li> </ul>
Fraud and Scams	<p>Complaints relating to fraud and scams including:</p> <ul style="list-style-type: none"> <li>i) Unauthorised withdrawal or transaction;</li> <li>ii) Fraudulent application or cloned cards;</li> <li>iii) Cheque forgery;</li> <li>iv) Phishing scams; or</li> <li>v) Malwares affecting usage of internet/mobile banking facilities.</li> </ul>
Fraud and Scams	<p>Complaints relating to fraud and scams including:</p> <ul style="list-style-type: none"> <li>vi) Unauthorised withdrawal or transaction;</li> <li>vii) Fraudulent application or cloned cards;</li> <li>viii) Cheque forgery;</li> <li>ix) Phishing scams; or</li> <li>x) Malwares affecting usage of internet/mobile banking facilities.</li> </ul>
Safeguarding of customer information	<p>Complaints relating to the management of data and financial consumers' information that include any violations of secrecy provision, data protection laws or guidelines including:</p> <ul style="list-style-type: none"> <li>i) Using a financial consumer's information for purposes other than the one(s) that the financial consumer has consented to;</li> <li>ii) Unauthorised leaks of financial consumers' information; or</li> <li>iii) Staff negligence or error by bank staff or system in sending financial consumer's information or documents to the wrong party either verbally or in writing (e.g. e-mails, letters, fax).</li> </ul>
Channel Related	<p>Complaints relating to any of a RE's delivery channels including:</p> <ul style="list-style-type: none"> <li>i) Faulty ATM or ATM did not dispense money;</li> <li>ii) Faulty cash or cheque deposit machine;</li> <li>iii) Transactions through e-channels did not go through;</li> <li>iv) Incorrect recording or dispense of amount;</li> <li>v) System offline;</li> <li>vi) Non issuance of receipt/slips for deposits/withdrawals made at</li> </ul>





Abandoned Project	Housing	Complaints relating to the financing of houses involved in abandoned projects including but not limited to the following: i) RE's imprudence or negligence in processing and disbursing funds to housing developers; ii) Legal actions taken against borrowers affected by abandoned housing projects; or iii) High or additional interests, penalties or fees imposed on borrowers on home loans affected by abandoned housing projects
Access to financing		Complaints relating to but not limited to the following: i) Restructuring or rescheduling; ii) Reduction/termination of credit facility; iii) Rejection of credit application; or iv) Request for new or additional credit facility.
Others		Refers to reporting on stockbroking, other investment bank's and all other complaints not specified in any of the above categories.

This monthly reporting is done as part of Orion Operational Risk reporting that covers a broad range of KPI-KRI indicators. On a monthly basis (by M + 10), Client Services shall provide the previous months complaints statistics – number of client complaints per BNM category – to OPC team who centralizes and reports all the required indicators via the Orion system of BNM.

The second report required by BNM is the submission of Statistical Report of Complaints Statistics by all Financial Institutions on a semi-annual basis. The submission of Statistical Report of Complaints Statistics is performed by the appointed Complaints Statistic Statistical Officer of BNP Paribas Malaysia Berhad.

For the purpose of this semi-annual reporting, the Complaints Statistics report shall be submitted by FI to BNM via the Integrated Submission Platform at <https://statsmart.bnm.gov.my/statsmart/> which is a web-based application set-up by the Bank. The FI shall download the Excel template provided by the Bank via the Integrated Submission Platform.

## ii) PayNet (formerly known as MyClear)

PayNet requires all participants to report the number of client complaints on a monthly basis as part of PayNet initiative to verify and assess Participants' compliance to the relevant PayNet rules. List of the reporting requirements on customer query, complaint and dispute are as follows (non-exhaustive list). Please refer to other PayNet's Participation Rules or Operational Procedures for other products which are applicable to BNP Paribas Malaysia in regard to reporting requirements.

### Reporting Requirements on Customer Query, Complaint and Dispute:

- Operational Procedures for JOMPAY - BNP Paribas Malaysia is required to report to [NBPS@paynet.my](mailto:NBPS@paynet.my) with the detailed listing of all customer query, complaint and dispute on the 7<sup>th</sup> of every month.
- Operational Procedures for FPX - BNP Paribas Malaysia is required to report to [ebizfpx@paynet.my](mailto:ebizfpx@paynet.my) with the detailed listing of all customer query, complaint and dispute on the 7<sup>th</sup> of every month
- Overlay Service Procedures for DuitNow (V1.2) - BNP Paribas Malaysia is required to report to [rpp@paynet.my](mailto:rpp@paynet.my) with the detailed listing of all customer query, complaint and dispute on the 7<sup>th</sup> of every month.



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Also, all participants are required to adhere to the SLA for addressing customer complaints as stipulated by PayNet in the respective PayNet's Participation Rules or Operational Procedures.

PayNet also stipulates the requirements on dispute management between PayNet and Participants to ensure all the disputes are managed on a timely basis and in accordance to the relevant PayNet requirements as stipulated in the respective PayNet's Participation Rules or Operational Procedures.

BNP Paribas Malaysia shall always refer to the latest PayNet's Participation Rules or Operational Procedures and to comply with the requirements on dispute management between BNP Paribas Malaysia and customer, other participants as well as PayNet.



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## **South Korea**

### **BNP Paribas Seoul Branch**

#### Local regulatory reporting

- Seoul Branch requires to publicly announce the number of client complaints on a quarterly basis as part of Publication of Management set forth by the Banking ACT and relevant regulations.

#### Obligation to Explain

- When Seoul Branch staff solicits an ordinary financial consumer to conclude a contract or when an ordinary financial consumer requests explanation, he/she should explain complaint filing and/or dispute resolution procedures concerning financial products to the ordinary financial consumer in a manner that the ordinary financial consumer can understand, in accordance with the ACT on the Protection of Financial Consumers and relevant regulations.
- When explaining, Seoul Branch staff should provide a written explanation necessary including contact information to the ordinary financial consumer and shall obtain confirmation that the ordinary financial consumer understands the explanation by requesting the ordinary financial consumer to affix his or her signature or print his or her name and affix his or her seal, by tape-recording oral statements of the ordinary financial consumer, or by other methods prescribed by Presidential Decree.

### **BNP Paribas Securities Korea**

#### Local specific requirements

#### Compliant Supplementation\*

- If BNPP Securities Korea (the company) finds the document related to complaint or the assertion of the petitioner to have a significant flaw, the company may demand the petitioner for supplementation due within 7 days, which may change due to petitioner's request.
- If the petitioner fails to deliver the requested supplementation or if the request for supplementation is not answered twice, then the complaint is deemed to be withdrawn and can be concluded internally within the company.  
(\*refers to Sec KR's Financial Consumer Protection Standards, Article 10)



#### Complaints processing deadlines

Written acknowledgement must be sent to the complainant within **7 business days** upon receipt of the complaint. The letter should acknowledge receipt of their complaint and summarise when the complainant will receive a progress update. The acknowledgement letter should include the name and contact details of the person handling the complaint.

A written interim or final response shall be provided to the complainant in writing within **14 business days** from the date of receipt of the complaint.

If a final response cannot be given within 14 business days, an interim reply, explaining the reason for the delay and indicating when the final response will be expected, must be sent to the complainant. After the interim reply, the final response to the complainant should be provided within **30 business days** from the receipt of the complaint. If a final response is not possible within 30 business days due to the complexity of the complaint, a holding reply, explaining the delay and indicating when a finalized response will be expected, is required.

The customer may complain directly to MAS or copy MAS in their complaint. For such cases, MAS should be kept updated of the progress of the complaint, including acknowledgement and resolution.

Between confirmation of receipt and response, the client must be kept informed at appropriate intervals of the progress made with the processing of their complaints, never leaving them uninformed. The clients must be advised in the event of any special circumstances preventing the Business, Territory or Entity from complying with their deadline commitments.

As soon as the resolution of a complaint is unlikely to be possible within 8 weeks of receipt, Compliance should be consulted immediately in order to consider whether such has implications under local complaints regulation.



## Taiwan

### Local specific requirements

### Entry points and channels

For Taiwan Branches, clients can refer to below contact details:

- Client's assigned Relationship Manager, Desk Head; or
- Contact information of complaint supervisory officer (published on FSC Websites)
- At the request of FSC, the following contact information of complaint supervisory officer is published on FSC website. Upon receiving complaint via this channel, the case would be forwarded to relevant business MCC for further handling by following APAC Client Compliant Policy and TW Instruction Note TW 0034 for Wealth Management.

	Bank
Name	Ms. Nicole Wu
Tel	8758-3101
Fax	8758-3102
Email	<a href="mailto:tw.compliance@asia.bnpparibas.com">tw.compliance@asia.bnpparibas.com</a>

### Complaints processing deadlines

Either one of the following responses must be given to the complainant in writing within **30 calendar days** from the date of receipt of the Complaint:

- a final response which either accepts the Complaint (and offers redress where appropriate) or offers redress without accepting the Complaint or rejects the Complaint and gives reasons for doing so. For complainants who are qualified as the "Financial Consumer" as stipulated in the "Financial Consumer Protection Act", they should be informed of their rights to make a complaint to the Financial Ombudsman Institution (FOI). Suggested wording to be incorporated in the final response is "Following the Financial Consumer Protection Act, please be reminded that if you are not satisfied with our reply below, you may, within 60 days after receiving this reply, apply to the Financial Ombudsman Institution (the "FOI") to institute an ombudsman case.";
- an intermediate response explaining why we are not in a position to give a final response, giving reasons for the delay and indicating when a final response can be expected;

For complex cases, where resolution of a complaint is unlikely to be done within 8 weeks of receipt, Compliance should be consulted in order to consider whether such has implications under local regulations.

### Financial ombudsman institution ("FOI")

The complainant, if qualified as the "Financial Consumer" as stipulated in the "Financial Consumer Protection Act", should be informed of their right to go to the FOI to resolve the complaint if the complaint is related to a civil dispute between a Financial Consumer and a financial services enterprise over a product or service.

Staff should make honest and diligent disclosure before mediators and/or arbitrators in connection with the FOI and render all reasonable assistance to the FOI.



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BNP Paribas Taiwan has expressed a willingness to abide by the dispute handling procedures of this Act by prior written consent and, therefore, shall accept the decision made by the FOI that requires it to make payment to a Financial Consumer less than NTD 1.2 million for investment products and services and less than NTD 120,000 for non-investment products and services.

An ombudsman statement that has been approved by a court of law shall have the same force as a final and irrevocable civil judgement, and the parties to the dispute shall not again institute legal proceedings in connection with the ombudsman case, nor shall it file a complaint or apply to institute an ombudsman case under the Financial Consumer Protection Act.

### **Handling complaints referred by regulators etc.**

Complaints made directly to market regulators, Financial Supervisory Commission, and other complaint handling organisations will be handled in accordance with this Policy and TW Instruction Note TW 0034.

### **Local regulatory reporting**

The FSC requires all financial institutions to report the relevant information (types, numbers and settlement amounts) of client complaints on a monthly basis.



## **Thailand**

### **Local specific requirements**

#### **Thailand CIB**

##### **Reporting requirements for complaint related to bond trading activities which is applicable to BNP Paribas, Bangkok branch**

According to Notification of the Board of Directors of the Thai Bond Market Association dated 12 March 2008, any client complaint related to trading activities of debt instruments must be reported to Thai Bond Market Associations (ThaiBMA) and The Securities and Exchange Commission (Thai SEC) requires that client complaints must be within the following timeframe;

- Reported to ThaiBMA within 10 days after receiving
- Reported to ThaiBMA within 15 Business days after final solutions

#### **Thailand Wealth Management**

##### **Thai SEC's regulations on Complaint handling process is applicable to Wealth management business in Thailand under BNP Paribas Securities (Thailand) Limited ("BNPP SEC TH")**

According to the SEC Notification No. SorThor. 26/2562 re: Details of the Business Operators' Complaint Handling, as amended ("SEC Notification No. 26/2562"), BNPP SEC TH is subject to the following requirements for handling complaints.

##### **Steps of complaint handling**

Under Clause 2 of the SEC Notification No. 26/2562, BNPP SEC TH is required to:

- (ii) receive complaints from the clients. If such complaints are made verbally, BNPP SEC TH shall record the complaints into writing and have them certified by the clients before commencing the resolution process;
- (ii) inform the clients the estimated time that BNPP SEC TH would use to determine or resolve their complaints from the date in which BNPP SEC TH receives such complaints;
- (iii) promptly resolve the problem in relation to the complaints. If the complaints are in relation to the operation of BNPP SEC TH 's agent (if any), BNPP SEC TH shall forward such complaints to the agent for the agent to determine and resolve the problem;
- (iv) if the problem is not successfully resolved within the estimated time informed to the clients under (ii) above, update its progress to resolve such problem to the Clients before the end of the estimated time and keep updating the clients regarding such progress until the problem is successfully resolved;
- (v) notify the client when the complaint has reached its conclusion within 7 days after a resolution has been reached; and
- (vi) inform the clients that, if BNPP SEC TH does not take proper action with respect to the complaints, the clients have the right to enter into an arbitration or other dispute resolution process in relation to such complaints.

If the complaints have been made with the SEC, and the SEC has forwarded them to BNPP SEC TH, BNPP SEC TH is also required to resolve the problems mentioned in the complaints according to the process in (ii) - (vi) above.

As mentioned above, BNPP SEC TH must keep records of the complaints along with other relevant evidence and documents for at least 2 years from the conclusion of the complaint.

##### **Reporting requirements for complaint handling**

BNPP SEC TH is required to conclude the number and details of complaints it received, with the complaints categorized into different groups, and present such information to its board of directors or designated committee. BNPP SEC TH is also required to submit such information and the relevant evidence to the SEC quarterly, within 15 days from the last date of each quarter via the SEC's online portal.



## **Vietnam**

### **Local specific requirements**

#### **Settlement of indemnification to clients**

After the final response has been issued to client, within maximum 05 business days, BNPP Vietnam shall reimburse to such client upon mutual agreement with client as well as applicable laws for the incurred losses without client's fault and/or out of force majeure cases as agreed in the account opening terms and conditions.

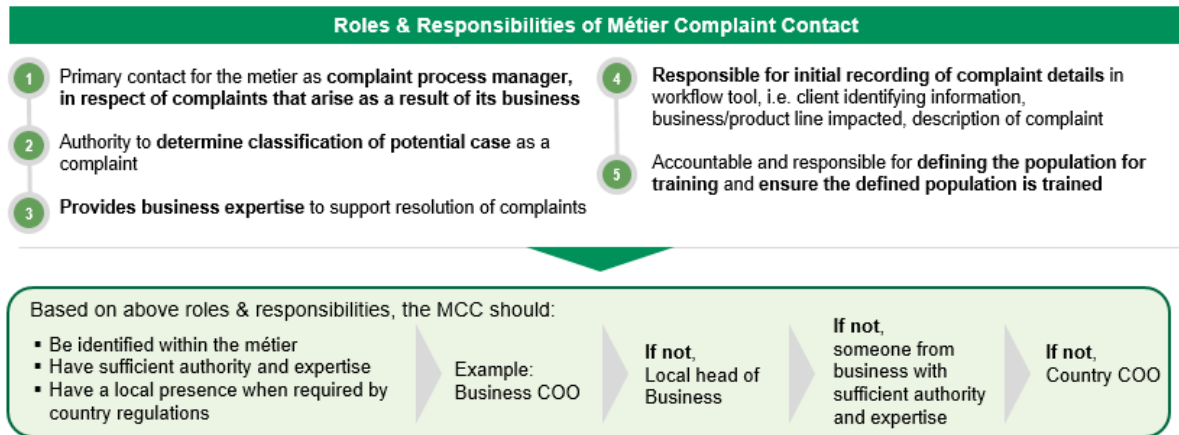
#### **Criminal-signal suspicion from the complaints**

During the course of investigate the complaints, if there is any signal of criminal involved, BNPP Vietnam is responsible to notify competent authorities in-charge of criminal prosecution and State bank of Vietnam. The same notification in writing should be sent to client about the status of handling their complaint. In this stage the complaints will be processed by such competent authorities. Within 15 business days of receipt the conclusion from competent authorities that there is no criminal detected, BNPP Vietnam shall agree with client how to resolve such result of complaint investigation.

If no mutual agreement can be reached between BNPP Vietnam, clients and any related party, the dispute shall be treated under applicable laws on dispute settlement



## APPENDIX 2: GUIDELINES TO APPOINT MÉTIER COMPLAINT CONTACT (MCC)





## APPENDIX 3: INDICATORS TO IDENTIFY A REPORTABLE COMPLAINT

### INDICATORS

Examples of indicators which can help to identify a reportable complaint:

- Statement of dissatisfaction related to any potential **breach of law or regulation**
- Statement of dissatisfaction related to the **repetition** of the same issue, or multiple issues
- **Escalation** within the internal organisation of the client / request for escalation within BNPP's organisation
- Statement of dissatisfaction and **request for a formal response / remediation action plan**
- The root cause of service disruption/failure expressed by the client **requires investigation/is not resolvable in the normal timeframe of business / operations.**

### OUT OF SCOPE

- Ordinary request for information, advice or clarification
- One-off mere negative statement on BNPP service/product
- One-off statements of dissatisfaction related to **operational issues that are resolvable promptly in the normal timeframe of business / operations with no material impact on the client**
- Clients'/counterparties' comments or remarks relating to minor hiccups or occasional and temporary malfunctioning of systems



## APPENDIX 4: CIB PIC TAXONOMY (GUIDELINE)

Complaint Category	Complaint Type
System	System - tool, application, platform, interface, etc - not accessible / malfunctioning
	System - tool, application, platform, interface, etc - not user friendly
	System - tool, application, platform, interface, etc - excessive response time
Operation	Operational - operation / transaction not processed
	Operational - operation / transaction processed with delay
	Operational - operation / transaction incorrectly processed
	Operational - problem with reporting
Organisation	Organizational - problem with our internal organisation / governance
Commercial	Commercial - lacking staff resources / availability
	Commercial - staff lacking knowledge or expertise
	Commercial - relationship / service level problems
	Commercial - inappropriate / abusive behaviour
Product, Service, Performance	Product / Service / Performance - lack of product / unsatisfactory product
	Product / Service / Performance - unsatisfactory performance / not delivering as agreed
	Product / Service / Performance - inappropriate advice
Fraud	Fraud - internal fraud
	Fraud - external fraud
Compliance	Compliance - failure in fair treatment / fair execution
	Compliance - market manipulation
	Compliance - improper selling / improper suitability / sales inappropriateness
	Compliance - information or disclosures incomplete / unclear / misleading / inappropriate
	Compliance - abusive / inappropriate pricing
	Compliance - unfair discrimination by product or service
	Compliance - breach of confidentiality / leak of confidential information
	Compliance - conflict of interests
	Compliance - transaction / account blocked for financial security reason
Legal / Risk	Legal / Risk - regulatory breach
	Legal / Risk - contract clauses unbalanced / unclear
	Legal / Risk - no authorised signatory
	Legal / Risk - breach of terms of engagement / fiduciary duty
	Legal / Risk - data protection failure
Other	Other