



BLACKTOWER

FINANCIAL MANAGEMENT GROUP

Complaints Policy



**Blacktower Financial Management
(International) Limited**

1. Blacktower Financial Management International Limited (BFMI) take care to maintain high standards of service. When we become aware of a client's concern or unease, we will resolve the matter as quickly as possible and will handle the client's concern fairly and within a reasonable timescale.
2. As required by the Gibraltar Financial Services Commission rules, BFMI has a written complaints handling procedure and all employees, agents, representatives, and advisers are aware of the procedures and must act in accordance with this at all times.

3. Definition of a Complaint

A complaint is defined as:

Any oral or written expression of dissatisfaction, whether justified or not, from or on behalf of a person about the provision of, or failure to provide, a financial service or a redress determination which:

- a) Alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience, and
- b) Relates to
 - i. an activity of your firm, or any firm with whom your firm has some connection in marketing or providing financial services or products, which come under the jurisdiction of the Financial Ombudsman Services where available
 - ii. the provision of investment services to a client by an investment firm
 - iii. selling structured deposits to clients, or advising clients on them, where a sale or advice is provided by an investment firm.

4. If a client has a complaint arising from their relationship with Blacktower Financial Management (International) Limited and the products or services provided to them, the client should contact our complaints management function by either:

- a) sending an email to complaints@blacktowerfm.com
- b) sending a letter to Complaints Management, Blacktower Financial Management (International) Limited, Waterport Place, Floor 2, Unit 2.3, Europort Road, GX11 1AA Gibraltar.
- C) Completing the form via the website; www.blacktowerfm.com/international/complaints

5. Upon receipt of a complaint, the BFMI Complaints Team will use their best endeavors to resolve a concern as soon as possible. The Team will write to the client within five business days to acknowledge the complaint and let them know when we expect to be able to issue a full response.

6. When acknowledging a complaint, the Team may request further clarification where necessary from the client.
7. The Team will keep the client informed of the progress of the complaint investigation by writing to them again after four weeks if the complaint is not resolved by sending a final response letter.
8. A full investigation will be carried out using all records held on file, together with any relevant reports from other parties involved.
9. After eight weeks, if a final response letter (FRL) has not already been sent, we will issue:

A final response letter detailing the conclusion of our investigation and resolution of the complaint. The final response letter will also confirm that if a client remains dissatisfied with our final response, they may refer their complaint to the Regulator.

OR

A letter explaining the reasons why we are still not able to make a final response and indicating when we expect to be able to provide a final response letter.

10. If we receive a complaint that is not about us or our services, and assuming that we can identify the firm to whom the complaint should be addressed, we will take the following action:
 - We will forward the complaint to the firm involved and ask them to contact the client directly with their response.
 - We will enclose a copy of the client's original complaint letter to that firm.
 - We will write to the client to explain the above points and include the contact details of the relevant firm.
11. A complaint is considered closed when a final response letter is issued.
12. If the complainant feels that their complaint has not been resolved satisfactorily by Blacktower Financial (Management) International Limited, they may refer the matter to the:

Gibraltar Financial Services Commission, P.O. Box 940, Suite 3, Ground Floor, Atlantic Suites, Europort Avenue, Gibraltar.

The FSC has no statutory powers to neither undertake the role of an ombudsman in respect of complaints nor act as arbitrator in commercial disputes.