



BancTrust Investment Bank Limited

External Complaints Policy

12/02/2025

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Document Information

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1. Purpose

This Policy details how BancTrust Investment Bank Limited (“BancTrust”) and any associated companies will deal with complaints when carrying out its business.

2. Scope and Applicability

This Policy covers all BancTrust operations in the UK, and any of its affiliates providing services to it. All relevant BancTrust staff have a requirement to ensure that complaints from clients or potential clients are properly handled.

BancTrust is a MiFID Investment Firm, authorised by the Financial Conduct Authority (“FCA”) and, as such, will act in accordance with the Complaints rules as defined in the FCA Handbook, which will take precedence over the requirements of this Policy.

3. What is a Complaint?

The FCA¹ describes a complaint as the following.

1. 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](#):
 - (a) Which alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience; and
 - (b) Either:
 - (i) To which article 26² of the [MiFID Org Regulation](#) applies; or
 - (ii) Which concerns the [equivalent business of a third country investment firm](#).

A complaint is a clear expression of dissatisfaction made orally or in writing from, or on behalf of, an actual or potential client or counterparty about BancTrust’s provision of financial services, failure to provide a financial service to the standard expected or issues relating to a particular trade.

A complainant can be a Professional client or Eligible counterparty. BancTrust does not deal with Retail clients. Eligible complainants can refer their complaints on to the Financial Ombudsman Service.

4. Responsibilities

4.1. Board and Compliance Responsibilities

- The BancTrust Board exercises oversight of the Firm’s complaint handling arrangements (including implementation of, and monitoring compliance with, the Complaints Policy).

¹ [MiFID complaint - FCA Handbook](#)

² [Article 26 Obligation to report transactions | European Securities and Markets Authority](#)

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- The Compliance Department is responsible for the development and implementation of the Complaints Policy, including complaint-handling.

4.2. Employee Responsibilities

All employees are expected to refer any verbal or written complaints to the Chief Compliance Officer at the earliest opportunity and to cooperate fully with the investigations.

4.3. General Responsibilities

Clients and potential clients can submit complaints free of charge. Complaints will be handled promptly, effectively and in an independent manner, obtaining additional Information as necessary.

BancTrust will always communicate with clients and potential clients clearly in plain language that is easy to understand and will reply to the complaint without undue delay.

BancTrust will assess fairly, consistently and promptly:

- The subject matter of the complaint.
- Whether the complaint should be upheld.
- What remedial action or redress may be appropriate; and
- Whether another party may be solely or jointly responsible for the matter alleged in the complaint.

Factors that may be relevant in the assessment of a MiFID complaint include the following:

- All the evidence available and the circumstances of the complaint.
- Similarities with other complaints received by BancTrust.
- Relevant guidance published by the FCA, other relevant regulators, the Financial Ombudsman Service or former schemes; and
- Appropriate analysis of decisions by the financial ombudsman service concerning similar complaints received by the Firm.

BancTrust will promptly comply with any offer or remedial activity, or redress accepted by the complainant. BancTrust will consider a complaint closed when it has issued a final response.

If a complaint is referred to the Financial Ombudsman Service, BancTrust will cooperate fully with the Financial Ombudsman Service and comply promptly with any settlement or awards made by it.

5. Timelines

On receipt of a complaint BancTrust will send the complainant a written acknowledgement within 24 hours (unless exceptional circumstances delay this) providing confirmation that it has received the complaint and is dealing with it.

BancTrust will ensure that the complainant is kept informed of the progress of the measures being taken for resolution of the complaint. BancTrust will write to complainants after four weeks if it has not reached a decision. BancTrust will issue a final response to the complainant within eight weeks and inform the complainant, if eligible, about their options for onward referral to the Financial Ombudsman Service.

If BancTrust resolves the complaint by close of business on the third business day following the receipt of the complaint then BancTrust will issue a final response to the complainant, advising that it considers the complaint as resolved and inform the complainant about their options for onward referral to the Financial Ombudsman Service. In these circumstances, there will not be a requirement to issue a holding letter or final response letter.

BancTrust may promptly forward the complaint in writing to another party if they have reasonable grounds to believe that the other party may be solely or jointly responsible for the matter alleged in the complaint. If a complaint is forwarded, BancTrust will inform the complainant promptly in a final response of why the complaint has been forwarded to another party and provide the complainant with the other party's contact details.

If BancTrust receives a forwarded complaint, the complaint will be treated as if BancTrust has received the complaint directly and the same time limits will apply from the date on which BancTrust has received the forwarded complaint.

6. Complaints Time Barring

If BancTrust receives a complaint which is outside the time limits for referral to the Financial Ombudsman Service, it may reject the complaint without considering the merits but will explain this to the complainant in its final response.

The Financial Ombudsman Service will not consider a complaint if the complainant refers it to the Financial Ombudsman Service:

- More than six months after the respondent sent the complainant its final response.
- More than six years after the event complained of.
- More than three years from the date on which the complainant became aware that he had cause for complaint.

7. Record keeping

BancTrust will keep a record of each complaint received and the measures taken for its resolution and retain that record for at least five years where the complaint relates to MiFID business or three years for all other complaints from the date the complaint was received.

8. Review of Policy

This Policy will be reviewed regularly, at least once a year, and amended as considered necessary in the event of changing circumstances or regulations.

9. Financial Ombudsman Service

Address: The Financial Ombudsman Service, Exchange Tower, London E14 9SR

Tel: 0800 023 4567 (free for most people ringing from a fixed line) or 0300 123 9123 (cheaper for those calling using a mobile) or +44 20 7964 0500 (if calling from abroad)

Email: complaint.info@financial-ombudsman.org.uk

Website: www.financial-ombudsman.org.uk

10. How to Make a Complaint

If you have a complaint in relation to BancTrust, please contact us by e-mail or by post as follows:

E-mail: compliance@banctrust.co.uk

Post:

Chief Compliance Officer
BancTrust Investment Bank Limited
8 Bishopsgate Level 36
London
EC2N 4BQ