

Complaints Handling Policy

投诉处理政策

29 April 2022

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I. Introduction 引言

BCR Co Pty Ltd (hereinafter referred to as the “Company”) is private limited company incorporated in the British Virgin Islands, (Company No. 1975046), licensed and regulated by the British Virgin Islands Financial Services Commission – (License Number SIBA/L/19/1122), having its Registered address at Trident Chambers, Wickhams Cay, PO Box 146, Road Town, Tortola, British Virgin Islands. This Complaints Handling Policy (the “Policy”) establishes procedures for BCR Co Pty Ltd (“the Company”) to effectively manage and resolve complaints received from clients.

BCR Co Pty Ltd (以下简称“公司”)是在英属维尔京群岛注册的私营有限公司(公司编号 1975046), 其由英属维尔京群岛金融委员会颁发许可和进行管理 - (许可证编号 SIBA /L/19/1122), 注册地址位于 Trident Chambers, Wickhams Cay, PO Box 146, Road Town, Tortola, British Virgin Islands。本投诉处理政策(“政策”)是关于 BCR Co Pty Ltd (“公司”)有效管理和解决客户投诉的规程。

1. Control Objective 控制目标

This Policy’s objective is to maintain the confidence of the company’s clients when they have a complaint and, therefore, minimize the potential risk of damage to our reputation and reduce the risk of litigation by handling complaints from our customers or prospects in a timely, effective, and consistent manner.

本政策旨在当客户提出投诉时, 能够维护客户对公司的信心, 因此将损坏公司声誉的潜在风险降至最低, 并通过及时、有效和一致的方式, 处理客户投诉或可能的投诉, 从而减少诉讼风险。

2. Responsible Persons 负责人

The Compliance Officer of the Company is designated as responsible for complaints management function, namely the application of this policy, and to review this policy on a regular basis to ensure that it continue to comply with industry laws, regulations, guidelines and best practices and investigation. The Compliance Officer of the firm is also responsible to communicate this firm’s policy to all employees, officers, directors, representatives, and advisors of the firm.

公司的合规官员被指定为投诉管理部门的负责人, 即: 应用本政策, 及定期评审本政策, 以确保其持续符合行业相关法律、条例、指引、最佳实践和调查的要求。公司合规官员也负责将本公司的政策传达给所有员工、管理人员、董事、代表和顾问。

All complaints will be forwarded to the Compliance Officer, regardless of how they originate. The Customer Service (CS) Manager will screen all complaints and forwarded them to the relevant delegated person who will operate on behalf of the Compliance Officer and who are responsible for reporting any resultant action and the outcome to the Compliance Officer.

无论投诉来自何处, 应将其全部提交至合规官员。客服(CS)经理将对所有投诉进行筛查, 并将其转至相关的指派人员。由其代表合规官员进行处理, 并负责将具体措施和处理结果汇报至合规官员。

The Customer Service (CS) Manager is responsible for monitoring and reporting minor complaints to the Compliance Officer. The CS Manager shall maintain a record of all complaints that may be required to be produced at any time without notice. The record shall include information identifying the complainant, the reason for the complaint and the progress of the matter.

客服(CS)经理负责监查, 及将微小投诉报告至合规官员。同时, CS 应随时保持全部投诉的记录。该记录应包括投诉人、投诉原因和事件进程相关的信息。

The Board is responsible for handling serious complaints, working together directly with the Compliance Officer.

董事会将与合规官员直接协作，共同处理严重投诉。

II. Purpose 目的

1. The purpose of our Complaints Handling Policy is to:

我方的投诉处理政策旨在：

- i. Recognize, and protect customers' rights, including the right to comment and complain;
认可与保护客户的权利，其中包括发表意见和投诉的权利；
- ii. Provide an efficient, fair, and accessible mechanism for resolving customer's complaints;
为解决客户投诉提供有效、公平和可适用的机制；
- iii. Provide information to customers on the complaints handling process.
为客户提供有关投诉处理进程相关的信息。

III. Definitions

定义

1. Complaint means 'a genuine expression of dissatisfaction or concern regarding the Company's services, or the complaints handling process itself.' A complaint may be made by, fax, email, in writing and via the Company's website. Verbal complaints should be documented immediately by the employee who receives the complaint.

投诉指有关公司服务或投诉处理过程本身的不满意度或关注的真实表达。在此，可通过传真、电子邮件、书面方式或公司网站提出投诉。口头投诉可由收到投诉的员工立即以书面方式予以记录。

2. 'Complainant' means the person or organization making the complaint.

‘投诉人’指提出投诉的个人或组织。

3. 'Client' or 'Customer' means a person or organisation receiving, a service, or engaged in a business relationship.

‘客户’或‘用户’指接受服务，或参与业务关系的个人或组织。

4. Dispute means a customer's formal disagreement with the products and services of the Company which leads to some type of internal or external review or determination.

争议指用户对公司产品和服务的正式不认可，其造成某类内部或外部评审或判定。

IV. Commitment

承诺

1. We are committed to efficient and effective complaints management. Our commitment involves:

我方承诺开展有效的投诉管理。我方的承诺包括：

- i. encouraging an organizational culture that welcomes complaints as an opportunity to improve services
鼓励建立欢迎投诉的企业文化，以提升服务；
- ii. the development and maintenance of a computerized Complaints System to manage complaints;
开发和维持计算机化的投诉系统，对投诉进行管理；
- iii. the adoption and dissemination of this policy 'BCR Co Pty Ltd Complaints Handling Policy';
and
采用并宣传本政策，即：BCR Co Pty Ltd 投诉处理政策；及

- iv. Reporting information about complaints management in executive and Board reports.
汇报管理层与董事会报告中有关投诉管理的信息。

V. Fairness 公平

1. We recognize the need to be fair to both the complainant, the Company and employee against whom a complaint may be made.
我方意识到应确保投诉人以及被投诉的公司和员工均能够得到公平对待。
2. If a customer complains, we will:
如用户提出投诉，我方将：
 - i. treat the complainant with tact, courtesy, and fairness at all times;
始终以积极、礼貌和公平原则，接待投诉人；
 - ii. maintain appropriate confidentiality of the complaint at all times; and
始终对投诉内容进行妥善保密；及
 - iii. not victimize or harass the complainant because of any complaint he/she makes against us.
不得因投诉人对我方提出投诉，而对其进行迫害或骚扰。

VI. Resources 资源

1. We have resources committed to the handling of complaints by way of a customized, computerized Complaints Log System that is available only to the Compliance Officer and Customer Service Support for handling and monitoring the complaints.
我方用于处理投诉的资源有定制化和计算机化的投诉记录系统，其仅限合规官员和客服支持部门在处理与监控投诉时使用。

VII. Visibility of the complaints process 投诉过程的透明度

1. We promote the existence of our Complaints Handling Policy through posting this policy on our website.
通过在我方网站上发布本政策，对投诉处理政策进行宣传：

VIII. Procedure 程序

1. Filing Complaints
提交投诉
 - i. The clients willing to submit a complaint are advised to complete a Complaint Form and to send it to the Company through the following: Send an email with an explanation of the complaint to compliance@thebcr.com.
需要提出投诉的客户可填写投诉表，并通过下列方式，将其发送至公司：通过电子邮件，将投诉内容发送至 compliance@thebcr.com.
2. How your complaint will be handled
投诉处理方式

- i. Upon receipt of a client complaint, the Company will register the complaint directly to our Complaints Log System, giving it a unique reference number. The unique reference number will be communicated to the complainant on our initial response letter within a reasonable time, and generally within 7 business days of receipt of the complaint. The unique reference number should be used in all future contact with our Company.
当收到客户投诉时，公司将投诉直接登记到投诉记录系统中，并给予其唯一参考编号。在合理期限内，一般为收到投诉起 7 个营业日，会在我方的初次回复函中，将该唯一参考编号告知投诉人，以便在未来，可通过该唯一参考编号，与公司展开所有联系。
- ii. We shall then thoroughly examine all complaints, our procedures for handling complaints are ruled to be fair and unbiased. We will then review the complaint and determine whether there is enough sufficient information to proceed with resolving it. We may ask you for further information or clarification.
随后，我方将对所有投诉进行核查。在此，我方将确保投诉处理程序的公平公正。我方将评审投诉，并确定是否有足够信息，用于解决投诉。我方可能向你方询问更多信息或说明。
- iii. We aim to resolve any complaint within 30 days from the date on which we received your complaint. This may not always be possible, as sometimes the complexity of the complaint may require more time to investigate fully. If we are unable to resolve your complaint within 30 days of receipt, we will contact you to explain why we are not able to resolve your complaint and give you an indication of when we will make further contact.
我方将尽力在收到投诉起的 30 天内予以解决。然而，鉴于某些投诉的复杂性，可能需要更多时间去调查。如我方无法在收到投诉起的 30 天内予以解决，我方会与你方联系，说明原因，并告知你方进一步联系的时间。
- iv. In the unlikely event that your complaint has not been resolved within three months of original receipt, we will send you a letter explaining why we have still not resolved your complaint and provide you with an expected finalization timeframe. The Company shall immediately inform the Commission of the complaint and shall the complainant, if he wishes, shall inform the Commission directly of his complaint and/or take any other relevant actions (including arbitration and/or court procedures).
在极少数情况下，即：自最初收到投诉起三个月内，无法解决投诉，我方将会向你方致函，告知仍无法解决投诉的原因，并提供预期的最终解决时间。公司应立即将投诉情况通知委员会，并且如投诉人愿意，可直接将投诉情况告知委员会和/或采取任何其它相关措施（包括仲裁和/或法院诉讼程序）。
- v. Our final response will advise of our findings and, where appropriate, what action is being taken to resolve the matter. We will address the subject matter of your complaint, and where the complaint is upheld, we will offer a resolution that is consistent with treating all our customers fairly.
我方的最终回应包括调查结果以及适用的解决方案。我方将设法解决投诉主题事项，并依照公平处理用户投诉的原则，提供解决方案。
- vi. If you contact us during our investigation and the member of staff handling your complaint is not available, then another member of our team will be able to help you.
如在我方调查期间，受理投诉的员工无法接听你方的电话，我方会指派其他员工为你方提供帮助。

3. Appealing a decision – external review

上诉决定– 外部审核

- i. When providing a final decision that does not fully satisfy the complainant's demands, we will notify the complainant in writing with a thorough explanation of our position on the complaint and set out the complainant's option to maintain the complaint e.g., through the Commission or the relevant Courts.

如投诉人对最终处理结果不满意，我方会以书面方式，向投诉人详细说明我方关于投诉的立场，并且投诉人有权通过其它方式，例如：委员会或相关法院，继续提出投诉。

IX. Charges 收费

1. Complainants shall be able to file complaints and receive the above procedures for complaints free of charge.
在依照上述程序处理投诉时，不会向投诉人收取任何费用。

X. Employee training and counselling 员工培训和辅导

1. Where a complaint is made about an employee, whether it is about the employee's general manner or about the employee providing wrong information, and after investigation if we consider the complaint is justified, the employee will be provided with training and/or counselling.
当投诉某一员工时，无论是关于其一般行为方式或提供错误信息，经调查后，如我方认为投诉是正确的，将对员工进行培训和/或辅导。

XI. Information of the relevant authorities 相关管理部门信息

1. Financial Services Commission
金融服务委员会
 - i. Website: <https://www.bvifsc.vg/>
网站: <https://www.bvifsc.vg/>
 - ii. Telephone Number: 284-494-1324 or 284-494-4190
电话号码: 284-494-1324 or 284-494-4190
 - iii. Address: Pasea Estate, P.O. Box 418, Road Town, Tortola, VG 1110, British Virgin Islands
地址: Pasea Estate, P.O. Box 418, Road Town, Tortola, VG 1110, British Virgin Islands

XII. Storage of complaint records 投诉记录的保存

1. The Company shall maintain all complaints or grievances for a minimum period of seven years. Records of all complaints will be retained in our Complaints Log System, for confidentiality, monitoring, and evaluation purposes. Access to the complaint's records will be restricted to authorised staff only.
公司将对所有投诉内容保存至少七年。所有投诉记录将被留存在我方的投诉记录系统中，以便保密、监控和评估。在此，仅限授权员工访问投诉记录。

XIII. Review 评审

1. The Complaints Handling Policy will be reviewed at regular intervals to ensure it meets the needs of the Company and its customers by the Compliance Officer and will be approved by the Board of Directors of the Company.
合规官员将对投诉处理记录进行定期评审，并经公司董事会批准，以确保其符合公司要求。