

# ANTI-MONEY LAUNDERING POLICY

CREDIT GLORIOUS  
PROPERTY HOLDINGS LTD.  
COMPLIANCE DEPARTMENT

# COMPLAINT HANDLING POLICY

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# COMPLAINT HANDLING POLICY

## PREAMBLE TO THE COMPLAINT HANDLING POLICY

Welcome to the Complaint Handling Policy of Credit Glorious Property Holdings Ltd. As a company with a global presence and a commitment to excellence, we understand the importance of effective communication and the resolution of any concerns or issues that our clients, partners, and stakeholders may encounter.

This policy is crafted with the intent to provide a clear, fair, and efficient framework for handling complaints. It reflects our dedication to not only meet but exceed the expectations of those we serve. We believe that every piece of feedback is an opportunity to improve our services and strengthen our relationships.

Our operations across various regions, including Hong Kong, Sofia, Bulgaria, and Paris, France, are diverse and dynamic. This policy is designed to be inclusive and sensitive to the cultural and operational nuances of these regions while maintaining a consistent standard of complaint handling across our entire organization.

At Credit Glorious Property Holdings Ltd., we are committed to conducting our business with integrity, transparency, and respect for the individual. This Complaint Handling Policy is a crucial part of that commitment. We encourage all our stakeholders to engage with us openly and help us uphold the high standards we have set for ourselves.

## ARTICLE 1 - POLICY STATEMENT

At Credit Glorious, we pride ourselves on delivering high-quality services to our clients. We understand, however, that there may be occasions when our services do not meet our clients' expectations or our own high standards. Recognizing this, we are committed to addressing any issues promptly and effectively. Our Complaints Handling Policy is designed to ensure that all complaints are handled fairly, consistently, and wherever possible, resolved to the complainant's satisfaction. We view complaints as an opportunity to learn and improve for the future, as well as a chance to put things right for the person or organization that has made the complaint. Our policy is in full compliance with the Financial Conduct Authority (FCA) guidelines, reflecting our commitment to transparency, accountability, and continuous improvement in our service delivery.

### Principles of Complaint Handling

The Complaint Handling Policy of Credit Glorious Property Holdings Ltd. is grounded in the following principles:

- **Fairness:** Ensuring impartiality and objectivity in handling and resolving complaints.
- **Accessibility:** Providing a clear and straightforward email channel for lodging complaints.
- **Responsiveness:** Addressing complaints in a timely and efficient manner.
- **Transparency:** Keeping complainants informed about the status of their complaint and the steps involved in the resolution process.
- **Confidentiality:** Respecting the privacy of all parties involved and handling information sensitively.

## ARTICLE 2 – SCOPE

This policy applies comprehensively to all aspects of our operations and services. It covers complaints received about our financial services, consultancy activities, client interactions, and any other services provided by Credit Glorious. This includes, but

is not limited to, complaints regarding the quality of service, delays, client communication, staff conduct, billing, and the performance and suitability of financial products and advice provided. We ensure that all complaints are treated seriously and managed professionally, regardless of the nature or source of the complaint. This policy applies to all staff and representatives of Credit Glorious, who are expected to be familiar with this policy and to comply with its principles in their daily work.

## ARTICLE 3 – ACCESSIBILITY OF THE COMPLAINTS PROCESS

At Credit Glorious, we ensure that the process for making a complaint is straightforward and accessible to all our clients. Detailed information on how to lodge a complaint can be found on our website, clearly marked under the 'Client Support' or 'Contact Us' sections. Additionally, the procedure is outlined in all client agreements. To accommodate diverse needs, this information is available in multiple formats, including digital (on our website and via email communications), printed materials, and through direct verbal guidance via our customer support hotline. Clients with specific accessibility requirements can request information in alternative formats, such as large print or audio, ensuring inclusivity in our approach to client service. Complaints can be lodged exclusively via email to [complaint@creditglorious.com](mailto:complaint@creditglorious.com). Complainants are encouraged to provide detailed information about their concerns, including the nature of the complaint, dates, people involved, and any relevant documentation. Each complaint will be thoroughly investigated to understand the issue fully. This investigation may involve reviewing relevant documents, systems, and processes, and speaking with the staff involved. The aim is to establish a clear understanding of the facts and the root cause of the complaint.

## ARTICLE 4 – CATEGORIES OF COMPLAINTS

To ensure effective and efficient handling of complaints, Credit Glorious categorizes them into distinct areas. This categorization helps in directing the complaint to the most appropriate team or department for resolution and aids in quicker and more effective handling.

- **Service Quality:** This category addresses any issues clients might have with the overall standard of service they receive from Credit Glorious. It includes, but is not limited to, complaints about delays, the quality of information provided, the ease of doing business with us, and the accessibility of our services.
- **Product Issues:** Here, we deal with concerns specifically related to the features, performance, or suitability of our financial products. This could include issues with product functionality, discrepancies in product descriptions versus actual performance, or concerns about the appropriateness of a product for a particular client need.
- **Staff Behavior:** This category is dedicated to complaints concerning the conduct, professionalism, or behavior of our employees or representatives. It encompasses issues such as perceived rudeness, lack of respect, inappropriate advice, or any other behavior that does not align with Credit Glorious's standards of professionalism and client service.

## ARTICLE 5 - COMPLAINT HANDLING PROCEDURE

Upon receipt of a complaint via email, the following steps will be taken:

- **Registration:** The complaint will be logged into our complaint management system with a unique reference number.
- **Acknowledgment:** The complainant will receive an email acknowledgment of their complaint, along with

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the reference number and expected timelines for resolution.

- **Assessment and Investigation:** The complaint will be assessed, and an appropriate investigation will be initiated. This may involve gathering additional information from the complainant or relevant staff members.
- **Resolution and Response:** After investigation, a resolution will be proposed. The complainant will be informed of the outcome and any actions taken or proposed via email.
- **Closure:** Once the complainant is satisfied with the resolution, communicated via email, the complaint will be closed in the system. If the complainant is not satisfied, the complaint may be escalated for further review.

## ARTICLE 6 – ESCALATION AND INDEPENDENT REVIEW

The escalation and independent review process is a critical component of Credit Glorious Property Holdings Ltd.'s Complaint Handling Policy, designed to provide an additional level of scrutiny and fairness. This process is activated when a complainant is not satisfied with the initial resolution of their complaint. The key elements of this process include:

1. **Initiation of Escalation:** If a complainant is dissatisfied with the initial response or resolution, they have the right to request an escalation. This request should be made via email to [complaint@creditglorious.com](mailto:complaint@creditglorious.com), clearly stating the reasons for dissatisfaction and any additional information or outcome desired.
2. **Escalation to Senior Management:** The escalated complaint will first be reviewed by a higher-level manager who was not involved in the initial complaint resolution. This manager will re-examine the complaint details, the steps taken during the initial investigation, and the rationale behind the initial decision.
3. **Independent Review Committee:** If the complainant remains unsatisfied after the review by senior management, the complaint can be forwarded to an Independent Review Committee. This committee will consist of members who are not directly involved in the operational aspects of the company, such as independent directors or external advisors, to ensure impartiality.
4. **Thorough Reassessment:** The Independent Review Committee will conduct a thorough reassessment of the complaint. This may involve a fresh examination of the facts, interviewing relevant parties, and reviewing documentation and correspondence related to the complaint.
5. **Recommendation and Final Decision:** Based on its reassessment, the Independent Review Committee will make recommendations for resolution. The final decision, taking into account these recommendations, will be communicated to the complainant. This decision is considered final within the company's internal complaint handling process.
6. **Transparency and Communication:** Throughout the escalation and independent review process, the complainant will be kept informed of the status of their complaint, the steps being taken, and the expected timelines for resolution.
7. **Documentation and Learning:** All stages of the escalation and independent review process will be documented in detail. Insights gained from this process will be used to improve the company's services and complaint handling procedures.

8. **External Resolution Options:** If, after the independent review, the complainant is still not satisfied, they will be informed of any external bodies or regulatory agencies where they can seek further resolution, especially relevant in jurisdictions like the UK, Hong Kong, Bulgaria, and France.

## ARTICLE 7 – RECORD KEEPING AND REPORTING

Effective record keeping and reporting are essential components of Credit Glorious Property Holdings Ltd.'s Complaint Handling Policy. This ensures accountability, transparency, and the opportunity for ongoing improvement in service quality. The following steps outline the approach to record keeping and reporting:

1. **Comprehensive Record Keeping:** Every complaint received, along with all related communications, decisions, and actions taken, will be meticulously recorded in the company's complaint management system. This includes details such as the date of receipt, nature of the complaint, steps taken for resolution, and final outcome.
2. **Data Protection and Privacy:** In line with data protection laws, particularly relevant in jurisdictions like the UK and the EU, all personal information contained within complaint records will be handled with strict confidentiality and security, according to the GDPR Regulations, the Data Protection Act 2018, and to all the relevant applicable laws.
3. **Regular Reporting:** Periodic reports will be generated from the complaint management system. These reports will provide insights into the volume, nature, and status of complaints, highlighting trends and patterns that may require attention.
4. **Analysis for Improvement:** The data from these reports will be analyzed to identify common issues or recurring complaints, which can indicate systemic problems or areas needing improvement.
5. **Management Review:** Senior management will regularly review these reports to assess the effectiveness of the complaint handling process and to make informed decisions about necessary changes or enhancements.
6. **Transparency with Stakeholders:** Summarized reports may be shared with stakeholders, including regulatory bodies, to demonstrate the company's commitment to transparency and continuous improvement.

## ARTICLE 8 – CONFIDENTIALITY

To ensure the confidentiality and privacy of all parties involved in a complaint, in accordance with Credit Glorious Property Holdings Ltd.'s commitment to data protection and privacy.

### Confidential Handling:

- **Privacy Assurance:** All complaints will be treated with the utmost confidentiality. Information shared during the complaint process will be accessible only to those directly involved in resolving the complaint.
- **Restricted Access:** Access to complaint details will be strictly limited to relevant staff members who need the information to effectively address the complaint.

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## Data Protection Compliance:

- **Policy Adherence:** Handling of personal information will be in strict compliance with the company's Data Protection and Privacy Policy.
- **Regulatory Compliance:** All actions will adhere to applicable data protection laws and regulations, including GDPR in Europe and relevant local laws in Hong Kong, Sofia, and Paris.

## Secure Information Management:

- **Secure Systems:** Personal data related to complaints will be stored in secure, encrypted systems with controlled access.
- **Data Minimization:** Only the necessary amount of personal information required to resolve the complaint will be collected and processed.

## Anonymity Options:

- **Anonymous Reporting:** Where possible and appropriate, complainants will be given the option to file complaints anonymously.
- **Protection of Identity:** The identity of complainants will be protected and not disclosed without their consent, unless required by law or by judicial order.

## Staff Training on Confidentiality:

- **Awareness Training:** Staff of Credit Glorious Property Holdings Ltd. will receive regular training on the importance of confidentiality and data protection in the complaint handling process.
- **Best Practices:** Training will include best practices for maintaining confidentiality and securely handling personal information.

## Communication of Confidentiality Practices:

- **Transparency with Complainants:** Complainants will be promptly informed about how their information will be used and protected.
- **Clear Guidelines:** Clear guidelines on confidentiality will be provided to complainants at the outset of the complaint process.

## Review and Audit:

- **Regular Audits:** We conduct regular audits to ensure compliance with confidentiality and data protection practices.
- **Policy Review:** We regularly review and update our confidentiality practices to align with evolving data protection laws and best practices.

## Breach Response:

- **Incident Management:** In the event of a confidentiality breach, a defined incident response plan will be activated.
- **Notification Procedures:** Complainants will be notified in accordance with legal requirements and company policies in the event their personal data is compromised.

## ARTICLE 9 – FEEDBACK AND CONTINUOUS IMPROVEMENT

The feedback and continuous improvement aspect of the policy focuses on leveraging complainant feedback to enhance the complaint handling process:

1. **Soliciting Feedback:** After the resolution of a complaint, feedback will be sought from the complainant regarding their experience of the complaint handling process. This may be done through surveys, emails, or direct communication.
2. **Analyzing Feedback:** The feedback received will be analyzed to understand the complainant's satisfaction level and to identify any areas for improvement in the process.
3. **Implementing Changes:** Based on the feedback and analysis, necessary changes will be implemented to improve the complaint handling process. This could involve training staff, updating procedures, or enhancing communication strategies.
4. **Regular Policy Review:** The Complaint Handling Policy will be reviewed at regular intervals to ensure it remains effective and relevant. This review will consider changes in the company's operational environment, feedback from complainants, and best practices in complaint management.
5. **Adapting to New Challenges:** The company will remain adaptable to new challenges, such as changes in regulatory requirements or evolving customer expectations, ensuring that the complaint handling process is always aligned with current best practices and legal standards.

## ARTICLE 10 – STAFF TRAINING AND SUPPORT

To ensure all staff members at Credit Glorious Property Holdings Ltd. are well-equipped and supported to handle complaints effectively and in accordance with the company's standards, the following comprehensive training and support framework is established:

### Comprehensive Training Programs:

- **Content:** Training will cover the Complaint Handling Policy in detail, focusing on procedures for receiving, recording, and resolving complaints. This will ensure a consistent approach across the company.
- **Frequency:** Training will be conducted annually, with additional sessions following any significant policy updates. This ensures that all staff are up-to-date with the latest procedures and policy changes.
- **Inclusive Approach:** Training will be inclusive, ensuring all staff, regardless of their role, understand their part in the complaint handling process. This approach recognizes that effective complaint handling is a company-wide responsibility.

### Skill Development:

- **Focus Areas:** Training will emphasize essential skills such as communication, empathy, problem-solving, and conflict resolution. These skills are crucial for effective and empathetic engagement with complainants.
- **Methodology:** Interactive methods like role-playing, case studies, and group discussions will be used. These methods help staff apply theoretical knowledge in practical, real-world scenarios.
- **Continuous Skill Enhancement:** Ongoing workshops and seminars will be organized to continually enhance these skills, ensuring staff are equipped to handle evolving complaint scenarios.

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## Regular Updates:

- **Ongoing Learning:** Staff will receive regular updates on policy changes, regulatory requirements, and best practices in complaint handling, ensuring continuous learning and adaptation.
- **Responsive Training:** Training content will be updated in response to new challenges, feedback, and industry trends, keeping the staff abreast of the latest developments in complaint handling.

## Role-Specific Training:

- **Customization:** Training will be tailored to different roles, with additional modules for managerial staff on handling escalated complaints and decision-making processes.
- **Specialized Modules:** For roles directly involved in complaint handling, specialized modules will be developed to address specific challenges and responsibilities they face.

## Supportive Environment:

- **Internal Support:** A dedicated team or resource person will be available for consultation on complex complaints, providing guidance and support.
- **External Expertise:** Access to external experts for guidance on unique or challenging cases, ensuring that staff have the resources they need to handle complex situations.
- **Peer Support:** Encourage a culture of peer support and knowledge sharing among staff, fostering a collaborative environment for handling complaints.

## Performance Feedback:

- **Recognition:** Staff performance in complaint handling will be a criterion in performance reviews, with recognition for exceptional handling, encouraging a high standard of service.
- **Constructive Feedback:** Emphasize constructive feedback to encourage continuous improvement in complaint handling skills, fostering a culture of learning and development.

## ARTICLE 11 – COMMUNICATION OF THE POLICY

To ensure the Complaint Handling Policy is effectively communicated and accessible to all stakeholders, Credit Glorious Property Holdings Ltd. adopts a comprehensive communication strategy:

### Internal Communication:

- **Channels:** The policy will be disseminated through various internal channels, including emails, the company intranet, staff meetings, and training sessions. This multi-channel approach ensures that all staff members are consistently informed and reminded of the policy.
- **Induction:** New employees will be introduced to the policy as part of their onboarding process. This ensures that from the onset, they understand the company's commitment to effective complaint handling.
- **Ongoing Reminders:** Regular reminders and highlights of key policy aspects will be shared internally. This may include periodic newsletters,

intranet updates, or dedicated segments in team meetings, reinforcing the importance of the policy in daily operations.

### Accessibility to Clients and Partners:

- **Availability:** The policy will be published on the company's website, ensuring easy access for clients and partners. It will also be included in client welcome packs as part of the onboarding process for new clients.
- **Request Basis:** The policy will be made available upon request for clients and business partners, ensuring that anyone who needs to understand our complaint handling process can easily obtain the information.
- **Proactive Sharing:** The policy will be actively shared with both new and existing clients and partners during meetings, through direct communications, and in client newsletters. This proactive approach ensures that all stakeholders are aware of how complaints are managed.

### Public Availability:

- **Visibility:** The policy will be accessible on the company's website and prominently displayed in customer service areas. This ensures that anyone interacting with our services can easily find and understand our complaint handling procedures.
- **Corporate Literature:** Credit Glorious will include the Complaint Handling Policy in annual reports, brochures, and other public documents, ensuring widespread awareness among a broader audience.

### Language and Clarity:

- **Clarity:** The policy will be written in clear, unambiguous, and simple language, making it easy to understand for all readers.
- **Translations:** To cater to our diverse client base in Hong Kong, Sofia, and Paris, the policy will be available in multiple languages, ensuring cultural sensitivity and accessibility.

### Regular Updates:

- **Review Cycle:** The communication strategy for the policy will be reviewed annually and updated as necessary to reflect any changes in the policy or the company's operations.
- **Stakeholder Information:** All stakeholders, including staff, clients, and partners, will be informed about significant changes to the policy. This will be done through direct communications, updates on the company website, and through internal and external publications.

## CONCLUSION OF THE COMPLAINT HANDLING POLICY

As we conclude this Complaint Handling Policy, Credit Glorious Property Holdings Ltd. reiterates its unwavering commitment to maintaining the highest standards of service and integrity. This policy is a testament to our dedication to transparency, fairness, and responsiveness in addressing the concerns and complaints of our clients, partners, and stakeholders.

We recognize that effective complaint handling is not just about resolving individual issues but is integral to our continuous improvement and customer satisfaction. By adhering to the principles and procedures outlined in this policy, we aim to strengthen our relationships with clients and partners, enhance

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our operational efficiency, and uphold our reputation as a responsible and responsive organization.

This policy will be subject to regular review and revision to ensure that it remains relevant, effective, and aligned with the latest legal requirements and best practices. We encourage all employees, clients, and partners to familiarize themselves with this policy and to contribute to its successful implementation.

In closing, Credit Glorious Property Holdings Ltd. assures all stakeholders that every complaint will be treated with the seriousness it deserves, handled with the utmost professionalism, and resolved in a timely and satisfactory manner. We believe that through this policy, we can turn challenges into opportunities for growth and continue to build a company that not only meets but exceeds the expectations of those we serve.

Thank you for your trust and cooperation in making our complaint handling process a model of excellence and effectiveness.