

Complaints Handling Policy

1. Introduction

Green Crowd Limited ("Green Crowd") is committed to providing high quality crowdfunding services to all clients. We value feedback from our clients and recognise that effective complaints handling is an important part of delivering excellent customer service. This policy outlines our approach to handling complaints in a fair, timely and effective manner, in compliance with applicable regulations including Regulation (EU) 2020/1503 on European crowdfunding service providers for business and Commission Delegated Regulation (EU) 2022/2117.

1.1 Purpose

The purpose of this policy is to:

- Ensure that all complaints are handled fairly, consistently and promptly
- Identify and address any recurring or systemic problems
- Increase client satisfaction
- Comply with all relevant regulatory requirements

1.2 Scope

This policy applies to all complaints received from clients relating to Green Crowd's crowdfunding services, whether received verbally or in writing, and through any channel including in-person, telephone, email, website, or social media.

1.3 Definition of a Complaint

For the purposes of this policy, a complaint is defined as: "Any statement of dissatisfaction addressed to Green Crowd by one of its clients relating to the provision of crowdfunding services."

2. Key Principles

Green Crowd's complaints handling process is guided by the following key principles:

2.1 Customer Centricity

We put our customers at the heart of our complaints handling process. We listen to their concerns, treat them with empathy and respect, and strive to resolve their issues to their satisfaction.

2.2 Fairness and Objectivity

All complaints are investigated in an equitable, objective and unbiased manner. We ensure that complainants are not subject to discrimination or retaliation as a result of making a complaint.

2.3 Accessibility and Simplicity

Our complaints process is easily accessible and simple to understand. Information about how to make a complaint is clearly communicated to clients through multiple channels.

2.4 Responsiveness

We respond to complaints promptly and keep complainants informed about the progress of their complaint throughout the process.

2.5 Effectiveness

Our process aims to resolve complaints effectively by addressing the specific issues raised and providing appropriate remedies where warranted.

2.6 Continuous Improvement

We use complaints data to identify areas for improvement in our services and processes, and implement changes accordingly.

2.7 Compliance

Our complaints handling process complies with all relevant regulatory requirements, including those set out in Regulation (EU) 2020/1503 and applicable regulatory technical standards and guidelines.

3. Responsibilities

3.1 Board of Directors

The Board of Directors has overall responsibility for ensuring that Green Crowd has an effective complaint handling process in place. The Board will:

- Approve the complaints handling policy
- Ensure adequate resources are allocated to complaints handling
- Review regular reports on complaints handling
- Oversee the implementation of any changes resulting from complaints analysis

3.2 Senior Management

Senior Management is responsible for:

- Promoting a culture that values complaints and their effective resolution
- Ensuring the complaints handling process is implemented in accordance with this policy
- Providing adequate training to staff on complaints handling
- Reviewing complaints data and identifying trends or systemic issues
- Reporting to the Board on complaints handling performance

3.3 Compliance Function

The Compliance Function is responsible for:

- Maintaining the complaints handling policy and procedures
- Monitoring compliance with the policy and regulatory requirements
- Providing guidance to staff on complex complaints

- Conducting regular reviews of the complaints handling process
- Preparing reports for Senior Management and the Board

3.4 Complaints Handling Officer

The Complaints Handling Officer is responsible for:

- Overseeing the day-to-day operation of the complaints handling process
- Ensuring all complaints are logged and tracked appropriately
- Allocating complaints to appropriate staff for investigation and resolution
- Monitoring adherence to timelines for complaint resolution
- Escalating complex or high-risk complaints as necessary
- Maintaining the complaints log

3.5 All Staff

All staff are responsible for:

- Being aware of the complaints handling policy and procedures
- Identifying complaints and escalating them appropriately
- Cooperating fully with complaint investigations
- Treating complainants with courtesy and respect

4. Complaints Handling Procedure

4.1 Accessibility of Complaints Procedure

Green Crowd provides easy access to its complaints handling procedure and the standard complaint template on its website (www.greencrowd.ie/complaints). This information is clearly visible and easily accessible to all clients.

4.2 Languages

The complaints handling procedure and the standard complaint template are available in the respective languages used by Green Crowd for Key Investment Information Sheets (KIIS) and marketing communications.

4.3 Receiving Complaints

When you lodge a complaint with us, we believe it is best to deal with the issue as soon as possible and in the easiest and most direct way.

Complaints may be received through various channels including:

- By telephone: 01 912 0345
- By email to info@greencrowd.ie
- Via our website contact form
- By post to our registered address: Enterprise House, O'Brien Road, Carlow, R93 Y0Y3

When a complaint is received, the following information should be gathered:

- Full name and contact details of the complainant
- Details of the complaint including dates, amounts, and specific issues
- Any relevant documentation
- The complainant's desired outcome

We aim to resolve your query at the first contact, if possible. If this is not possible, we endeavour to resolve your complaint within 10 working days.

If you are unhappy with our response, you can request an escalation of the complaint which can only be made via the abovementioned channels.

4.4 Recording Complaints

All complaints will be recorded in the central complaints log within one business day of receipt. The complaints log is maintained by the Complaints Handling Officer and includes the following information:

- Date complaint received
- Complainant name and contact details
- Summary of the complaint
- Staff member responsible for handling
- Current status
- Actions taken
- Date resolved
- Outcome

A template of the complaints log is attached as Appendix B.

4.5 Acknowledging Complaints

We will acknowledge all complaints in writing within 5 working days of receipt. The acknowledgement will include:

- Confirmation of whether the complaint is admissible
- Name and contact details of the person handling the complaint
- Our understanding of the nature of the complaint
- Expected timeframe for resolving the complaint

If a complaint is deemed inadmissible, we will provide the complainant with a clear explanation of the reasons for the inadmissibility.

4.6 Investigating Complaints

Upon receipt of an admissible complaint, we will:

1. Assess whether the complaint is clear and complete.

2. If the complaint is unclear or incomplete, promptly request any additional information or evidence necessary for proper handling.
3. Gather and examine all relevant evidence and information regarding the complaint.
4. Keep the complainant duly informed about any additional steps taken to handle the complaint.
5. Reply to reasonable information requests made by the complainant without undue delay.

All complaints will be investigated thoroughly and objectively by staff with appropriate competence who were not directly involved in the subject matter of the complaint. The investigation will:

- Review all relevant documentation
- Interview relevant staff members
- Analyse applicable policies and procedures
- Consider any similar previous complaints
- Assess whether the complaint indicates any systemic issues

4.7 Resolving Complaints

We aim to resolve all complaints within 10 business days of receipt. If a complaint cannot be resolved within this timeframe, we will:

- Inform the complainant of the reasons for the delay
- Provide an estimate of when the complaint will be resolved
- Continue to update the complainant every 10 business days until the complaint is resolved

When resolving a complaint, we will:

- Address all points raised by the complainant
- Provide a clear explanation of our decision
- Ensure consistency with previous decisions on similar complaints, or provide an objective justification for any deviation
- Offer fair and appropriate redress where warranted
- Implement any actions required to resolve the complaint

4.8 Final Response

Once a final decision has been reached, we will provide the complainant with a written final response which will include:

- A summary of the complaint
- The results of our investigation
- Our final decision, addressing all points raised in the complaint
- Details of any offer of redress or remedial action
- Information on available remedies if the complainant is dissatisfied with the outcome, including how to refer the complaint to the Financial Services and Pensions Ombudsman

4.9 Communication with Complainants

All communications with complainants will be:

- In clear and plain language that is easy to understand
- In writing, sent by electronic means or, upon the complainant's request, in paper form
- In the same language in which the complaint was filed, provided it is one of the languages in which we offer our KIIS documents or marketing communications

4.10 Complaints Referred by Regulatory Bodies or Ombudsman

For complaints referred to us by regulatory bodies such as the Central Bank of Ireland or the Financial Services and Pensions Ombudsman, we will:

- Acknowledge receipt to the regulatory body within 5 business days
- Investigate the complaint thoroughly as outlined above
- Provide a full response to the regulatory body within 20 business days, including all relevant documentation
- Implement any required actions promptly
- Update our internal records and complaints log accordingly

5. Monitoring and Reporting

5.1 Ongoing Monitoring

The Complaints Handling Officer will monitor the progress of all open complaints on a daily basis to ensure they are being handled in accordance with this policy and regulatory requirements.

5.2 Management Information

The following management information will be produced quarterly and reviewed by Senior Management:

- Number of complaints received
- Types of complaints
- Average time to resolve complaints
- Number of complaints upheld
- Details of any compensation paid
- Identification of any trends or systemic issues

5.3 Board Reporting

A summary report on complaints handling will be provided to the Board of Directors on a quarterly basis. This will include:

- Overview of complaints volumes and trends
- Details of any significant individual complaints
- Root cause analysis of systemic issues identified
- Actions taken or proposed to address any issues
- Compliance with regulatory requirements and internal timelines

5.4 Regulatory Reporting

We will comply with all regulatory reporting requirements relating to complaints, including:

- Reporting complaints data to the Central Bank of Ireland as required
- Notifying the Central Bank of any complaints that disclose serious or repeated breaches of conduct of business rules

6. Training

All staff will receive awareness communications or training on this complaints handling policy and procedure as part of their induction. Refresher training will be provided annually and when there are significant changes to the policy or regulatory requirements.

Additional specialised training will be provided to staff directly involved in complaints handling.

7. Record Keeping

We will maintain full records of all complaints for a minimum of six years from the date of receipt of the complaint. These records will include:

- Name and contact details of the complainant
- Details of the complaint
- All communications with the complainant
- Results of the investigation
- Final decision and any redress offered
- Confirmation that any redress was accepted/provided

8. Review of Policy

This policy will be reviewed at least annually by the Compliance Function to ensure it remains effective and compliant with regulatory requirements. Any proposed changes will be approved by the Board of Directors.

Appendix A: Standard Complaint Form Template

Standard complaint template as specified in the Annex of Commission Delegated Regulation (EU) 2022/2117

SUBMISSION OF A COMPLAINT (to be sent by the client to the crowdfunding service provider)	
Personal Details of the Complainant	
First Name	
Surname	
Address (Street, number, floor, postcode, city, country)	
Telephone	
Email	
Your Preferred Method of Communication	Phone/Email/Post
Contact Details of any legal representative which you give permission to act on your behalf	Name Address Telephone Email
Information about the Complaint	
Full reference of the investment to which the complaint relates (i.e. investment reference number, name of the project owner/company and/or crowdfunding project, other references of the relevant transactions)	
Description of the complaint's subject-matter (please clearly specify the subject matter of the complaint)	
<i>Please provide documentation supporting the facts mentioned.</i>	
Date(s) of the facts that have generated the complaint	
Description of damage, loss or detriment caused (where relevant)	

Other comments or relevant information (where relevant)			
In	(place)	on	(date)
SIGNATURE			
COMPLAINANT/LEGAL REPRESENTATIVE			
<i>Documentation provided (please check the appropriate box):</i>			
	<i>Power of attorney or other relevant document</i>		
	<i>Copy of the contractual documents of the investments to which the complaint relates</i>		
	<i>Other documents supporting the complaint:</i>		

Appendix B: Complaints Log Template

Compl.ID	Date Received	Complainant Name	Complainant Contact	Complaint Summary	Handler	Status	Root Cause	Actions Taken	Date Resolved	Outcome