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Rigsave Capital Ltd is a category 2 investment service provider regulated and supervised by MFSA  
License n° C92570

## **COMPLAINTS HANDLING POLICY**

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## 1. INTRODUCTION

### A. Manager Background

Rigsave Capital Ltd (the “**Manager**”) is a limited liability company incorporated in Malta on 15 July 2019 and is authorised and regulated by the Malta Financial Services Authority (“**MFSA**”) to act as a UCITS Manager and as an Alternative Investment Fund Manager (“**AIFM**”) to provide the following investment services:

- Discretionary Portfolio Management; and
- Reception and Transmission of Orders;
- Investment Advice  
for Professional Clients (including Collective Investment Schemes) and Retail Clients.
- Nominee Services  
For Professional Clients (excluding Collective Investment Schemes) and Retail Clients

The Company has set up branches in Italy for the provision of marketing services, and it has therefore included the complaints handling process hereunder for both countries under 2 (v) and 2 (vi).

In terms of Standard Licence Conditions 1.19 and 1.20 of Part BII of the Investment Services Rules for Investment Services Providers, the Manager has established and implemented and maintains effective, appropriate and transparent procedures and arrangements to ensure that it deals promptly and reasonably with any complaints by the Manager’s clients and investors in the funds the Manager manages (henceforth “**Fund Investor**”s). For consistency and good standard practice basis, the Manager shall implement these procedures across all of its clients if and when a complaint arises.

The information regarding such procedures for client and Fund Investor complaints shall be made available to clients free of charge on the Manager’s website. Moreover, all clients and Fund Investors shall be able to file a complaint free of charge and the complaint shall be made in the language of the Member State or EEA State where the service or fund is marketed.

The Company has appointed the Compliance Officer (“**CO**”), [Ms Christine Dalli](#), as the person responsible for the implementation of this policy and coordination of each complaint received from its clients.

The [contents of this procedure document shall be reviewed on an annual basis and updated accordingly](#), if and when required.

### B. What is a Complaint?

A complaint is an expression of dissatisfaction, communicated to the Manager, either orally or in writing by a client of Fund Investor with respect to the investment services provided by the Manager. When done orally, the person lodging the complaint will be requested to write an email or in writing addressed to the Compliance Officer. Only complaints passed on via email or in writing will be treated officially and in accordance with this Procedure.

### C. Complaints Management

An effective complaints management system should ensure that the Manager is responsive and responsible in handling customer complaints and enquiries and ensures that the procedures are



adhered to. Details regarding the complaint gathered by an official of the Manager should be organised and accurate enough for the effective remedial action of such complaint.

One is ought to keep in mind that, whereas some complaints are straightforward and quick to solve, others may be more complicated and, depending on the type of complaint, may take longer to evaluate. Nevertheless, all complaints shall be treated with ultimate care and diligence. The individual handling the complaint shall be polite and well-mannered at all times when presented with a complaint.

It is highly important for the Manager to have clear procedures for dealing promptly with any client and Fund Investor complaints, to come to a fair conclusion, and to explain the reasons for what may be perceived by the client as a negative response.

#### **D. Provision of Information**

The Company shall, on request or when acknowledging receipt of a complaint, provide written information regarding its complaints handling process. The details of the complaints handling process must be published in an easily accessible manner, for example in contractual documents or in the Company's website.

The Company shall provide clear, accurate and up-to-date information on how to make a complaint and details on the process that will be followed when handling a complaint. The details on how to make a complaint should comprehend the type of information to be provided by the complainant and the identity and contact details of the person to whom this complaint should be directed.

#### **E. Complaints Register**

The CO shall maintain a Complaints Register in which every complaint and the action taken in its regard is logged. The Complaints Register shall contain the date on which the complaint was received and date of resolving such complaint. Records of complaints in the Compliance Register should be kept for at least 5 years.

The Complaints Register shall be provided to the MFSA during a compliance visit or upon request.

The Company shall keep and archive in a secure manner all the documentation relating to the complaints for a reasonable period of time, based on the nature of the complaint.

The Company shall provide information to complainants regarding their complaints, when reasonably requested.



## 2. COMPLAINTS HANDLING PROCEDURE

The CO is to be kept informed of all complaints.

The Company, supported by the Compliance Function, shall analyze on an on-going basis complaints handling data to ensure that they identify and address any recurring or systemic problems, and potential legal and operational risks.

When receiving a complaint, the Manager's officials handling the complaint shall adopt the following process:

- (i) upon receipt of a complaint, any individuals to whom such complaint was addressed should immediately inform in writing both the Manager's Operations Manager ("**OpM**") and CO;
- (ii) the Manager shall then acknowledge receipt of such complaint, in writing, within 15 days of receipt. In specific, the Manager shall provide via mail or, if this is not possible, via registered mail a confirmation to the client or Fund Investor concerned of the following items:
  - where a complaint is made orally, a summary of the complaint should be provided requesting the complainant to confirm in writing the said summary;
  - that the Manager shall acknowledge receipt of such complaint and investigate the complaint accordingly;
  - that upon completion of the investigation and without unnecessary delay, the Manager shall write to the complainant concerning the outcome of the investigation and describing its proposed course of action. Such a response should not take longer than fifteen working days from when the complaint was registered; and
  - that if the investigation is not completed within 2 months of receipt of the complaint, the Manager shall inform the complainant of such fact within 7 business days from the end of that period.
- (iii) the Manager shall then start its investigation, seeking to gather and corroborate all relevant evidence and information regarding the complaint;
- (iv) If the investigation of a complaint is not completed within 2 months from receipt of the complaint, within 7 days the Manager shall:
  - inform the complainant about the causes of the delay;
  - provide an indication as to when the investigation is likely to be completed; and
  - inform the complainant that, if the complainant is not satisfied with the progress of the investigation, the matter may be referred by him/her to the Office of the Arbiter for Financial Services ("**OAFS**") either by telephone on +356 2124 9245, by email to [complaint.info@financialarbiter.org.mt](mailto:complaint.info@financialarbiter.org.mt) or by post to:  
*Office of the Arbiter for Financial Services*  
*First Floor*  
*St Calcedonius Square*



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and that further information is available on the MFSA's website at <https://www.mfsa.mt/consumers/complaints> and on the OAFS's website at <https://financialarbiter.org.mt>.

- (v) In so far as the Italian Branch is concerned, the Investor may send its complaint to the address [info@rigsavecapital.com](mailto:info@rigsavecapital.com). The Company shall treat the complaint promptly and communicates the final outcome of the complaint and its decisions to the Investor, without undue delay. If the investor is not satisfied with the response to the complaint, or has not received a response to the complaint within 60 days from the date of receipt, the Investor may make the mediation attempt, provided as mandatory, at any body accredited by the Ministry of Justice and entered in the register of mediation bodies referred to in Legislative Decree no. 28 of 4<sup>th</sup> March 2010. Further information can be found on the website [www.conciliatorebancario.it](http://www.conciliatorebancario.it).
- (vi) the Manager shall send the complainant an email or, if this is not possible, a registered mail explaining the outcome of the investigation and suggested remedial actions, if applicable;
- (vii) if the outcome of the investigation or any suggested remedial actions the Manager communicated to the client does not fully satisfy the complainant's demand, the Manager shall provide to the complainant a thorough explanation of the Manager's final position on the complaint and set out the complainant's option to maintain the complaint by communicating with the OAFS as per the details above.
- (i) The CO finalised the Complaints Register entry in regard to the fully investigated complaint.

### Unrelated Complaints

Where the Company receives a complaint about activities other than those regulated by the MFSA or the activities of another financial services provider for which the Regulated Person has no legal or regulatory responsibility, The Company should explain its position on the complaint and/or direct the complainant to the appropriate entity.