



Bank of St. Helena Ltd.

www.sainthelenabank.com

Customer Complaints Policy

Reference: CS004
Date: July 2026
Classification: PUBLIC



Head Office: Market Street · Jamestown · St Helena Island · STHL 1ZZ

T. +290 22390 · F. +290 22553 · email. info@sainthelenabank.com · web www.sainthelenabank.com

Established and regulated in St Helena under the Financial Services Ordinance, 2008 and 2017, the Financial Services Regulations, 2017, the Company Ordinance, 2004 and the Company Regulations, 2004

CLASSIFICATION: PUBLIC

Contents

1. Our commitment to customers	3
2. What is a complaint?	3
3. How to make a complaint	3
4. Information to include in your complaint	4
5. How we will handle your complaint	5
5.1 Informal resolution	5
5.2 Formal complaints process	5
5.2.1 Decision and outcome	5
6. Timeframes	6
7. If you are dissatisfied with the outcome	6
8. Privacy and confidentiality	7
9. Contacting the Bank	7

1. Our commitment to customers

Bank of St Helena Ltd is committed to providing a high standard of service to all customers. We recognise that, from time to time, customers may be dissatisfied with a product, service, decision, process, communication or the conduct of a Bank employee.

We value complaints because they help us identify where something may have gone wrong, put matters right where appropriate, and improve the service we provide.

All complaints will be handled fairly, promptly, professionally and with respect for the privacy of the person making the complaint.

2. What is a complaint?

A complaint is any expression of dissatisfaction made by a customer, former customer, prospective customer, representative, beneficiary or other person affected by the Bank's products, services or conduct, where a response or resolution is expected.

A complaint may relate to, for example:

Complaint area	Examples
Service delivery	Delays, poor service, failure to respond, or failure to meet expected service standards.
Bank products or services	Concerns about an account, transaction, charge, facility or other Bank service.
Policies, procedures or practices	Concerns that a Bank policy or procedure was unclear, unfair or not followed.
Staff conduct	Concerns about the behaviour, communication or professionalism of a Bank employee.
Complaint handling	Dissatisfaction with how a previous complaint was handled.

General service requests, routine enquiries or requests for information may be handled through the Bank's normal customer service channels and may not always be treated as formal complaints.

3. How to make a complaint

Customers are encouraged, where appropriate, to raise concerns with the relevant employee or department first, as many issues can be resolved quickly and informally. However, you do not have to try informal resolution before making a formal complaint.

You may submit a complaint through any of the following channels:

Channel	How to complain
In person	Visit any Bank branch or office during normal working hours.

Telephone	Contact the relevant department, Customer Services, or another Bank contact point.
Email	Send your complaint to the Bank's designated complaints email address or to the relevant Bank employee or department.
Letter/Post	Write to the Bank and deliver or post your complaint.
Complaint Form	Complete the Bank's Formal Customer Complaints Form, where available.
Website/Online	Submit your complaint through the Bank's website or approved online channel, where available.
Representative	A complaint may be submitted by someone acting on your behalf, provided the Bank is satisfied that they have authority to do so.

The Bank will provide reasonable assistance where a person needs help to make a complaint or explain the issue clearly.

4. Information to include in your complaint

To help us review your complaint properly, please provide as much relevant information as possible, including:

Information requested	Details
Your name and contact details	Unless you wish to remain anonymous.
Preferred contact method	For example, telephone, email or letter.
Account or customer reference	Where applicable.
What happened	A clear summary of the issue.
When and where it happened	Dates, times, branch, department or service involved, where known.
Who was involved	Names or roles, where known.
Supporting documents	Copies of letters, emails, receipts, transaction details or other relevant evidence.
Desired outcome	What you would like the Bank to do to resolve the matter.

Anonymous complaints will be reviewed as far as reasonably practicable, particularly where they raise serious, regulatory, conduct or wider customer impact concerns. However, the Bank may be limited in its ability to investigate or respond where insufficient information is provided.

5. How we will handle your complaint

The Bank will handle complaints in a fair, objective and timely manner.

5.1 Informal resolution

Where possible, the Bank will try to resolve the issue early and informally at the first point of contact. This may be appropriate where the matter is straightforward and can be resolved quickly to your satisfaction.

If the matter cannot be resolved informally, or if the complaint is more serious or complex, it will be handled through the formal complaints process.

5.2 Formal complaints process

Step	What happens
1. Receipt and acknowledgement	The Bank will acknowledge your complaint as soon as reasonably practicable and, where possible, within five business days of receipt.
2. Review and assessment	The Bank will review the information provided, consider the circumstances fairly, and may contact you for further information if needed.
3. Investigation	The Bank will consider relevant records, communications, transactions, policies, procedures and any other relevant information.
4. Decision and outcome	The Bank will decide whether the complaint is upheld, partially upheld or rejected. These outcomes are explained in 5.2.1 below.
5. Response to you	The Bank will provide a clear response explaining the decision, the reasons for the decision and any action to be taken, where appropriate.
6. Closure	Once the complaint has been resolved, withdrawn, closed or treated as settled, the Bank will update its complaint records.

5.2.1 Decision and outcome

After reviewing your complaint, the Bank will assess the information available and may decide that your complaint is upheld, partially upheld, or rejected. The Bank will explain the reason for its decision and any action it will take, where appropriate.

Outcome	What this means
Upheld	The Bank agrees with your complaint, either fully or substantially. Where appropriate, the Bank will explain what went wrong and what action will be taken to put matters right.
Partially upheld	The Bank agrees with some parts of your complaint, but not all of it. The Bank will explain which parts have been accepted, which parts have not been accepted, and the reasons for this decision.

Rejected	The Bank does not agree with your complaint based on the information reviewed. The Bank will explain the reasons for its decision.
-----------------	--

Where a complaint is upheld or partially upheld, the Bank may take appropriate action depending on the circumstances. This may include an explanation, apology, correction of an error, reversal of a charge, refund, staff coaching, process improvement, or another fair and proportionate remedy.

Possible action	Examples
Explanation	Providing a clear explanation of what happened.
Apology	Apologising where the Bank has made an error or failed to meet expected standards.
Correction	Correcting records, account information or processing errors.
Refund or reversal	Reversing a charge or refunding an amount where appropriate.
Service improvement	Reviewing a process, procedure or communication.
Staff training	Providing coaching or training where a service or conduct issue is identified.
Other appropriate remedy	Any other fair and proportionate action based on the circumstances.

The Bank will consider each complaint on its own facts and will determine the appropriate outcome based on the information available.

6. Timeframes

The Bank will aim to resolve formal complaints within **30 business days**, where reasonably practicable.

Some complaints may take longer, particularly where the matter is complex, requires additional information, involves third parties, or requires detailed investigation. If the Bank cannot resolve your complaint within the expected timeframe, we will explain the reason for the delay and, where possible, provide an updated expected response timeframe.

7. If you are dissatisfied with the outcome

If you are dissatisfied with the Bank's response, you may request a further review of the matter within eight weeks from the date the Bank's response is delivered to you. Your request should explain why you are dissatisfied with the outcome and include any additional information you would like the Bank to consider.

If the Bank does not receive any indication that you are dissatisfied within this eight-week period, the complaint may be treated as settled and closed.

Where a complaint is serious, sensitive, recurring, regulatory in nature, or may involve material financial loss, misconduct, customer harm or a wider control issue, the Bank may escalate the matter internally for further review. Where required by law, regulation or regulatory requirement, the Bank may also notify the relevant regulatory authority.

8. Privacy and confidentiality

The Bank will use the personal information you provide for the purpose of reviewing, investigating and responding to your complaint.

Information relating to your complaint will be handled confidentially and shared only with those who need it to handle the complaint, or where disclosure is required or permitted by law, regulation, Bank policy or a competent authority.

Complaint records and supporting documents will be stored securely in accordance with the Bank's recordkeeping requirements.

9. Contacting the Bank

Complaints may be submitted to Bank of St Helena Ltd through the Bank's usual customer contact channels.

Bank of St Helena Ltd

Head Office: Market Street, Jamestown, St Helena Island, STHL 1ZZ

Telephone: +290 22390

Email: complaints@sainthelenabank.com

Website: www.sainthelenabank.com