

AFR Asia Pacific Ltd. Complaints Handling Policy and Procedures

1. Purpose and Scope

AFR Asia Pacific Ltd. (“AFR”) is committed to delivering excellent service and maintaining high standards of professionalism in all interactions with clients, partners, and stakeholders. This Complaints Handling Policy outlines AFR’s approach to managing complaints and ensures that all concerns are handled fairly, promptly, and in accordance with applicable laws and regulatory requirements, including those set by the **Labuan Financial Services Authority (LFSA)**.

This policy establishes a clear framework for identifying, handling, and resolving non-compliance incidents and supports AFR’s goal of continuous improvement.

2. Definition of a Complaint

A **complaint** is defined as any expression of dissatisfaction by a client, business associate, or other party regarding AFR’s services, products, conduct, or personnel. Complaints may be communicated verbally, in writing, or via any other medium.

3. Commitment to Effective Complaint Handling

AFR considers every complaint as an opportunity to improve service quality and client satisfaction. The company is committed to:

- Addressing complaints in a serious, impartial, and respectful manner.
 - Ensuring timely responses and resolutions.
 - Learning from complaints to improve internal processes and practices.
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4. Responsibilities

Compliance Officer / Complaints Officer

- Oversees the complaints management process.
- Ensures documentation, timely acknowledgment, and appropriate resolution of complaints.

Management Team

- Regularly reviews complaint trends.
 - Implements process and policy improvements based on complaint insights.
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5. Complaint Handling Procedures

Step 1: Receiving the Complaint

All complaints are to be submitted through the attached complaints form. [AFR Client Complaint Reporting Form 26012025.docx](#)

Complaints can be submitted via:

- **Email** : compliance@ afr-asiapac.com.my
- **Phone** : +603-5511-0760
- **In-Person** : At AFR's office
- **Mail:**
Compliance Officer
AFR Asia Pacific Ltd.
Unit 327, Block 4, Laman Seri Business Park
No 7 Persiaran Sukan, Seksyen 13
40100 Shah Alam, Selangor, Malaysia

Upon receipt, the Complaints Officer will:

- Acknowledge receipt of the complaint within **3 business days**.
 - Record complaint details, including nature, parties involved, and relevant documents.
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Step 2: Assessing and Categorizing the Complaint

Complaints will be categorized as follows:

- **Category A – Minor:** General service inquiries or non-critical issues.
- **Category B – Major:** Issues impacting business operations or client satisfaction.
- **Category C – Serious:** Involving misconduct, regulatory breaches, or legal concerns.

Complaint category will determine priority and resolution time frame.

Step 3: Investigating the Complaint

The Complaints Officer will:

- Review all relevant documentation and communications.
- Interview involved personnel.
- Request further information from the complainant, if necessary.

Investigation Timelines:

- **Category A** : Within **5 business days**
 - **Category B and C** : Within **10–15 business days**, contingent on information availability.
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Step 4: Resolving the Complaint

Following investigation, the Complaints Officer will:

- Determine an appropriate resolution.
 - Offer corrective actions, which may include:
 - Apologies and explanations.
 - Rectifications, replacements, or other remedies.
 - Process changes to prevent recurrence.
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Step 5: Communicating the Outcome

- Outcome will be shared with the complainant within **3 business days** of investigation completion.
 - If dissatisfied, the complainant will be informed of further escalation options (e.g. senior management review, external regulators).
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Step 6: Monitoring and Continuous Improvement

- Complaint data is tracked and analyzed for recurring trends.
 - Findings are used to improve AFR's services, training, and internal controls.
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6. Escalation Process

If not satisfied with the initial resolution, the complainant may escalate the complaint:

Internal Escalation:

Request review by AFR Senior Management or the Executive Chairman.

External Escalation:

If still unresolved, complaints may be directed to:

- An independent third-party mediator.
 - The Labuan Financial Services Authority or other relevant regulator.
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7. Confidentiality and Privacy

AFR ensures that all complaint-related information and personal data are:

- Handled confidentially.
 - Securely stored.
 - Accessed only by authorized individuals involved in the resolution process.
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Policy Review: This policy will be reviewed or upon significant regulatory changes to ensure continued relevance and compliance.