

This document summarises the complaints handling policy and process adopted by the Scottish National Investment Bank and its subsidiaries (together 'the Bank').

Managing complaints effectively and in a timely manner is an important aspect of providing a high standard of service to the businesses and projects the Bank will invest in as well as building a reputation for professionalism and trust with the Bank's stakeholders, public and private sector partners and investment counterparties.

The Bank defines a complaint as any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf, of a person or business. This includes complaints in relation to EU State Aid Rules (in particular regarding alleged 'crowding-out' of private finance).

Complaints Handling

All complaints received will be documented and referred to the Head of Compliance who will case manage the resolution of the complaint.

There are key components to dealing with complaints, namely:

➤ Capturing complaints

- Written complaints (hard copy or email) are easier to process but if a verbal complaint is received (in person or over the phone) then these must be captured also. The complainant should be encouraged to put their complaint in writing, but if they are unwilling to do so then a written note of the complaint must be made.
- The complainant will be asked for their contact details and whether they have a preference for email or hard copy correspondence regarding their complaint. This preference will be noted on the complaint record.
- The complaint must be passed to the Head of Compliance without delay.

➤ Acknowledging

- The complaint will normally be acknowledged in writing within 48 hours of receipt by the Head of Compliance.
- The written acknowledgement can be in hard copy or via email if the complainant has advised that this is acceptable.
- The acknowledgement communication must re-state the nature of the complainant's issue and provide information about the initiation of the investigation and the next steps which the complainant can expect, including the timescales involved (which will vary depending upon the complexity of the complaint and its investigation – refer below).
- If the matter of the complaint can be investigated and resolved quickly then the acknowledgement communication can also comprise the formal response and resolution of the complaint.

➤ Investigating

- The Head of Compliance must undertake a thorough and transparent investigation into the complaint and make a determination of whether the complaint should be upheld or rejected. The investigation may not involve any member of Bank staff involved in the subject matter to which the complaint relates.
- The Head of Compliance may engage with other teams in conducting their investigation and may consult with other members of the Governance Team in respect of the complaint and its implications.
- If the complaint raises serious issues or concerns, including any accusation of unethical, inappropriate or illegal activity by the Bank, the complaint will also be raised with a member of the Bank's Executive Committee.
- If the complaint relates to an individual member of Bank staff then, while that individual may be asked about the complaint and its background as part of the investigation, they will not be involved in the conduct of the investigation or its resolution.

➤ Resolving and responding

- Once a determination of the outcome of the complaint has been made (whether to uphold or reject) then this will be communicated to the complainant.
- If the complaint is to be upheld then the response will also set out any proposed remedial action or redress and how this will be settled.
- If the complaint is to be rejected then the response will also set out that if the complainant remains dissatisfied then they have the option to appeal the original decision through the General Counsel.

➤ Appeal

- The appeal will normally be acknowledged in writing within 48 hours of receipt by the General Counsel.
- The General Counsel will promptly undertake an investigation into the original complaint and the manner in which it was initially investigated and a determination made.
- The General Counsel will make a determination about whether to reject or uphold the appeal and communicate this determination in writing to the complainant.

➤ Timescales

- In order to ensure the prompt and efficient addressing of any complaints received by the Bank, the following timescales must be observed:

Action	Timescale
Initial acknowledgement (including resolution response, where possible)	Within 48 hours of receipt of complaint
Final response letter (simple complaint cases) or notification that Bank requires longer to investigate (complex complaint cases)	Within 2 weeks of receipt of complaint
Final response letter (complex complaints)	Within 8 weeks of receipt of complaint
Acknowledgement of appeal	Within 48 hours of receipt of appeal
Appeal final response (simple appeal)	Within 4 weeks of receipt of appeal
Appeal final response (complex appeal)	Within 6 weeks of receipt of appeal

Complaints monitoring and analysis

All complaints will be recorded centrally to enable monitoring and reporting of complaint activity.

Periodic reviews will be done across complaints to identify themes, confirm root causes and provide lessons learnt for the Bank to facilitate the continuous improvement of the Bank's service standards.

Contact details for complaints

Email

bankinformation@thebank.scot

Post

Head of Compliance
 Scottish National Investment Bank
 1-North Waverley Gate
 2-4 Waterloo Place
 Edinburgh
 EH1 3EG