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Client Charter

GBCORP B.S.C. (Closed)



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1. TERMS & DEFINITIONS

For the purpose of this charter, the following acronyms may apply:

Terms	Definitions
GBCORP B.S.C. (Closed)	“GBCORP” or “the Firm” , including the subsidiaries and managed SPVs.
Client Charter	A client's charter is a written commitment made by the Firm in respect of the quality of services and products delivered to its clients and shareholders. It is an assurance that services provided by the Firm will comply with quality standards. Generally, quality standards are standards that will fulfill clients' and shareholders' needs and expectations.
Working Days	The days of the week in which the Firm operates. This is typically Sunday to Thursday, except when the Central Bank of Bahrain declares certain days as official holidays.
The Clients	Individuals, institutions or entities dealing with the Firm to avail the financial services or products offered by the Firm.
Complaint	A verbal or written expression submitted to the Firm by one of its clients or shareholders expressing their dissatisfaction about the processes or the procedures followed to obtain the intended service or the way that the service has been provided.
Enquiry	A verbal or written expression submitted to the Firm by one of its clients or shareholders expressing their desire/or need to get information and/or clarification about the Firm's processes and procedures.
Opinion	A verbal or written expression submitted to the Firm by one of its clients expressing their views or judgment about the Firm, not necessarily based on facts or knowledge.
Comments	A verbal or written expression submitted to the Firm by one of its clients expressing their remarks about an opinion or reaction.
Whistleblowing	The reporting of an alleged fraudulent activity or an attempt allegedly deemed illegal or alleged malpractice which may have a possible impact on the Firm's clients, employees, shareholders or reputation.
Alleged Wrongful Conduct	Violation of law, breach of duty of care, infringement of the Firm's Code of Conduct, misappropriation of monies and actual or suspected fraud or abuse of Authority, of a financial or legal nature.

2. ABOUT THE CLIENT CHARTER

This Client Charter sets out the standards of service you can expect when dealing with the Firm and outlines how you can provide feedback to assist in improving the service standards.

A. SCOPE

- This Charter aims to set quality standards of the services and products provided by the Firm.
- It defines the Firm's procedures and timeframe when dealing with enquiries and complaints.
- This charter does not include matters related to litigation and disputes subject to legal action or force majeure

B. OBJECTIVES

- To enhance clients' and shareholders' confidence in the Firm.
- To improve understanding of what to expect from the Firm in terms of its services and relationship with clients, thereby reducing the likelihood of misunderstandings and complaints.
- To recognize, promote, and protect clients' and shareholders' rights.
- To provide clients and shareholders with an understanding of the Firm's service standards.
- To outline complaint channels
- To ensure clients are aware of how a complaint or an enquiry can be made, and in what format they can expect to receive a response.
- To continually improve the Firm's services, systems and employees' skills.

3. OUR SERVICE STANDARD

A. OUR COMMITMENT TO YOU:

- Deal with you in a friendly, courteous and professional way.
- To be honest, fair, equitable and unbiased in our service.
- Ensure the continual improvement of our services and processes according to your needs.
- Provide services according to approved procedures and commitments.
- Focus on our clients' needs in everything we do.
- Treat your information confidentially.
- Respond to your enquiries and complaints in an accurate and timely manner.
- Respect and listen to our clients.
- You may have someone else to represent to you or designate someone to help you in your dealing with us. We will treat your representative the same way we would treat you.

B. DEALING WITH ENQUIRIES:

- You can lodge your enquiry through a formal letter, which you can post, email or fax to our Investors Relations.
- We aim to acknowledge your written communication within three (3) working days and to respond within two (2) weeks of receipt of the correspondence.
- If we cannot provide a full answer to your query within that specified time, we will provide you an interim response and advise you as to when a final response can be expected.

C. DEALING WITH COMPLAINTS AND FEEDBACK:

GBCORP is committed to providing its clients with the highest standard of service. However, should a client complain because he/she feels the Firm has failed to deliver what it has promised, the Firm will do everything possible to ensure that such a complaint is dealt with fairly, promptly and effectively.

We also welcome suggestions on how we can improve service delivery. The information provided here will show you how to:

- i. Make a complaint.
- ii. Escalate if you are not satisfied with the response provided by the Firm in response to your complaint.
- iii. Take further action if you are still dissatisfied with the outcome.

a. Mechanism for submitting Complaints:

Your complaint must be in writing and should be addressed to the Investors' Relations and must be marked to the Firm's **Complaint Handling Officer**.

In compliance with the directives of the Central Bank of Bahrain, the Firm has appointed a Complaint Handling Officer, who is responsible for ensuring that your complaint is acknowledged, properly investigated, and that the Firm's response is adequately communicated to you.

b. Options for submitting Complaint:

- a) Hand delivery to GBCORP's Office (GEO reception) located at 5th Floor, GBCORP Tower, Bahrain Financial Harbour, Sea-Front Manama, Kingdom of Bahrain
- b) Via Fax to the following number +973 17 200300
- c) Courier or post to the following address:
Compliant Handling Officer
GBCORP B.S.C. (Closed)
5th Floor, Bldg 1411,
Road 4626, Block 346
Bahrain Financial Harbour
P.O. Box 1486
Sea-Front Manama, Kingdom of Bahrain
- d) Or scan and email the written complaint to: complaints@gbcorponline.com

c. What happens once your complaint is submitted?

GBCORP seeks to satisfied its clients throughout the business it conducts and services it provides, any complaint will be treated seriously and in accordance with our complaints procedure in which we seek to rectify any such complaints in a timely manner

- a) Once you have submitted your complaint, we will acknowledge within five (5) working days.
- b) Your complaint will be referred to the concerned person/department which will investigate it thoroughly and a written response detailing the outcome of our investigation and our decision shall be provided to you within four (4) weeks of receiving your complaint.

In the unlikely event that your complaint is not answered within the timeframe, we will write and let you know the reasons why there has been a delay and the additional action that we will take including when we anticipate to have concluded our investigation.

- c) After receiving the final response to your escalated complaint, and if you are still not satisfied, you can write directly to the Compliance Directorate of the Central Bank of Bahrain or you can submit the case through the "Complaint form" available on the Central Bank of Bahrain website www.cbb.gov.bh, within 30 calendar days from the date of receipt of our final response.

D. HANDLING OF COMPLAINTS

a. If You Write to Us, We Will:

Aim to acknowledge your communication and reply to you according to our service standards provided in this Charter.

b. If You Call Us, We Will:

- Be available between 8.30 a.m. and 4:30 p.m. each business day.
- Welcome your call and always identify ourselves by department name.
- Strive to resolve your query by the end of the call. If your enquiry is more complex, we will provide you an interim response and advise you as to when a final response can be expected.

E. HOW YOU CAN HELP US DELIVER AN EXCELLENT SERVICE

- Quote your full name and client identification number if you are an existing client.
- Inform us your objectives and expectations.
- Work with us to set and achieve realistic timescales.
- Update your contact details whenever there are changes to maintain accurate records with us.
- Respond as soon as possible to any requests for information – including providing us with your updated passport/ID for KYC requirements.
- By understanding that in addition to our commitments towards you, we also have to abide with various legal and compliance requirements.
- Provide us with the updated FATCA and CRS forms.
- Treat our employees with courtesy and be honest with us.

4. WHISTLE BLOWING

A. REPORT AN INCIDENT:

If you have observed any alleged wrongful conduct, malpractice or an improper/ unethical behavior of an employee of the Firm, you are encouraged to report the incident to the Firm through the following means:

Report to ‘Head of Compliance, Corporate Governance & MLRO’ by sending an email at whistleblowing@gbcorponline.com or by post at the below address:

*GBCORP B.S.C. (Closed)
5th Floor, Bldg 1411, Road 4626,
Block 346, Bahrain Financial Harbour
P.O. Box 1486, Sea-Front Manama,
Kingdom of Bahrain*

B. PROTECTION RIGHTS FOR WHISTLEBLOWERS:

- a) GBCORP is committed to the protection of Whistleblowers against potential actions that may be taken in reprisal for making the protected disclosure.
- b) The Whistleblower’s identity, the nature of the report, and the suspected person’s identity are strictly confidential.
- c) Retaliation against an individual, who in good faith, had made a complaint, disclosed information relating to a complaint or otherwise participated in an investigation relating to a complaint is prohibited regardless of the outcome of the investigation.
- d) The Board Audit Committee of the Firm will be responsible to assess the reported incident and to decide the course of action.