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WEALTH ADVISORS

August 2026

Complaints handling policy – Biograph Wealth Advisors Limited ("Biograph")

Complaints Handling Policy – Version History		
Version	**Date**	**Summary of Changes**
1.0	1 January 2026	Effective from 1 January 2026. Changes: • Updated policy to reflect the FSPO • Updated policy to reflect CPC 2025 amendments
2.0	26 August 2026	Effective from 26 August 2026. Changes: • Added the CPC 2025 definition of 'complaint' and referenced the Standards for Business Regulations 2025 and the Consumer Protection Regulations 2025 • Added a digitalisation provision for complaints received via a digital channel • Added a provision for handling complaints in an omnichannel manner • Standardised timelines to 'working days' (previously 'business days') • Introduced periodic root-cause analysis of complaints (at least every six months), with findings escalated to the Board • Added a section on support for consumers in vulnerable circumstances

Scope:

This procedure is operated by the firm in relation to its financial services provided under the Consumer Protection Code 2025 ("CPC 2025"), as further described below.

Definitions:

The CPC 2025 comprises the Central Bank Reform Act 2010 (Section 17A) (Standards for Business) Regulations 2025 (S.I. No. 80 of 2025) (the "Standards for Business Regulations") and the Central Bank (Supervision and Enforcement) Act 2013 (Section 48) (Consumer Protection) Regulations 2025 (S.I. No. 81 of 2025) (the "Consumer Protection Regulations").

Under the Consumer Protection Regulations, a "complaint" means, subject to Regulation 260 of those Regulations, an expression of grievance or dissatisfaction by a consumer, either orally or in writing, in connection with (i) the provision or the offer of the provision of a financial service to a consumer by the firm, or (ii) the failure or refusal of the firm to provide a financial service to a consumer.

References to timelines in this policy are stated in "working days", being a day which is not a Saturday, Sunday, Good Friday or public holiday (within the meaning of the Organisation of Working Time Act 1997), in line with the terminology used in the CPC 2025.

Our objectives:

- To respond to complaints in a courteous, timely and fair manner.

- To endeavour to address the specific issues raised by our customers and, where appropriate, to update our procedures to avoid a re-occurrence of the problem.

- To endeavour to achieve a situation where our client feels we have addressed the complaint, but if he/she remains dissatisfied with the outcome of our efforts, to ensure that he/she is notified of the right to refer the matter to the Financial Services and Pensions Ombudsman (FSPO).

Procedure:

- The firm will establish and maintain a complaints file and all complaint records will be kept for six years.

- Where the firm receives an oral complaint, we will offer the client the opportunity to have the complaint treated as a written complaint. The firm will investigate the complaint based on our understanding of the issue.

- The firm will handle complaints in an omnichannel manner. A complainant may make, or continue to progress, a complaint using any channel offered by the firm (including by phone, email, post, in person or through a digital channel), and may move between channels without being required to repeat information already provided or resubmit their complaint. The firm will maintain a consistent, up-to-date record of the complaint and its progress regardless of the channel used.

- Where a complaint is received via a digital channel (for example, through our website), the firm will provide an immediate or automatic acknowledgement of receipt through that same channel. This acknowledgement will confirm receipt of the complaint and include details of the firm's complaints handling procedure and how, and in what circumstances, the complainant may refer the matter to the FSPO, together with the FSPO's contact details.

- The firm will acknowledge in writing each complaint within 5 working days of receipt. Our acknowledgement will contain a copy of these procedures and will inform the complainant that they can refer the matter to the FSPO if he/she is not happy with the outcome of our investigation.

- We shall investigate the complaint as swiftly as possible, and the complainant will receive an update on the complaint at intervals of not greater than 20 working days starting from the date on which the complaint is made.

- We will endeavour to resolve the matter within 40 working days of receiving the complaint. Where the 40 working days has elapsed and the complaint is not resolved, the complainant will be informed of the anticipated timeframe within which the firm hopes to resolve the complaint and the option to refer the matter to the FSPO (the contact details will be provided).

- Within 5 working days of the conclusion of our investigation of the complaint, the firm shall send a written report of the outcome of this investigation. This report shall include an explanation of the terms of any offer that the firm is prepared to make in settlement of the complaint. We will also inform the complainant of the right to refer the complaint to the FSPO (and will provide the consumer with the contact details for the FSPO)

- Where it appears to the firm that the complainant is not satisfied with the outcome of our investigation, and where we feel that we cannot progress the issue further, we will immediately write to the complainant advising them of their right to refer the dispute to the FSPO.

- A director will review the file before its conclusion and attempt to identify any procedures that can be implemented by our firm to avoid a repeat of the type of complaint received. Any new procedures will be immediately communicated to all staff and placed in the written procedures file.

- In addition to the review of individual complaint files, the firm will carry out a periodic root-cause analysis of complaints received, at intervals of not greater than six months. This analysis will identify any common causes, trends or systemic issues giving rise to complaints. The findings of each root-cause analysis, together with any actions identified, will be reported and escalated to the Board for review.

- The person responsible for complaints in this firm is: Andrew Martin

Support for consumers in vulnerable circumstances:

The firm recognises that a consumer may be in vulnerable circumstances for a wide range of reasons, including health issues, life events (such as bereavement, job loss or relationship breakdown) or a lack of capability, and that such circumstances may be temporary, permanent or fluctuating. The firm will take reasonable steps to support a consumer in vulnerable circumstances when making or progressing a complaint, including allowing additional time, offering alternative channels of communication and, where appropriate and with the consumer's consent, engaging with a nominated Trusted Contact Person or other supporter. Staff handling complaints will be appropriately trained to identify and respond to the needs of consumers in vulnerable circumstances, so as to remove barriers that might otherwise discourage or prevent a complaint from being made.

The Financial Services & Pensions Ombudsman can be contacted as follows:

- Address: Lincoln House, Lincoln Place, Dublin 2, D02 VH29
- Contact number: +353 1 5677000
- Email address: info@fspo.ie
- Website: fspo.ie