COMPLAINTS POLICY

CHURCHBRIDGE CAPITAL

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Author: George Wall MRICS, Director (CF1/SMF3/SMF16/MLRO)

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1. INTRODUCTION

1.1 Policy Statement

Churchbridge Capital Ltd ("Churchbridge Capital" or "the Firm") is an Appointed Representative (AR) of WSP Capital Ltd, which is authorised and regulated by the Financial Conduct Authority (FCA). Churchbridge Capital operates principally as a commercial finance broker in the unregulated lending space; however, where our activities engage regulated clients or regulated products, all FCA rules and the requirements of our principal firm, WSP Capital Ltd, apply in full.

Churchbridge Capital is committed to maintaining the highest standards of service and client care. We recognise, however, that on occasion clients or other stakeholders may be dissatisfied with the service they receive. This Complaints Policy & Procedure sets out the framework by which all complaints are handled promptly, fairly, and transparently, in line with the FCA's Dispute Resolution Sourcebook (DISP) and Consumer Duty obligations under PRIN 2A, and the NACFB Code of Practice. As an AR, all regulated complaints are ultimately the responsibility of WSP Capital Ltd as the principal firm, and we operate our complaints handling in full coordination with WSP Capital Ltd at all times.

1.2 Objective

The objectives of this policy are to:

- enable any person who is dissatisfied with our service, conduct, or products to easily raise a complaint through a clear and accessible process;
- ensure all complaints are handled impartially, consistently, and in accordance with this defined procedure;
- investigate and resolve complaints promptly, providing appropriate remedies where required;
- record, monitor, and analyse complaint data to identify root causes, systemic issues, and opportunities for improvement;
- meet all regulatory requirements under FCA DISP rules, Consumer Duty (PRIN 2A), and NACFB standards;
- keep complainants informed throughout the process and ensure they are made aware of their escalation rights, including referral to the Financial Ombudsman Service (FOS); and
- use complaints as a driver for continuous improvement in our service and client outcomes.

1.3 Scope

This policy applies to all complaints received by Churchbridge Capital from any external party, including clients/borrowers, prospective clients, introducers acting on behalf of clients, or members of the public, in relation to any product, service, or activity carried out by Churchbridge Capital.

It covers all formal complaints — expressions of dissatisfaction — whether made orally (by telephone or in person) or in writing (by letter, email, or any other written means). Internal employee grievances are handled under a separate HR grievance procedure and are not covered by this policy.

Where a complaint relates to a regulated activity, it will be handled in accordance with FCA DISP rules and escalated to WSP Capital Ltd where appropriate. Where a complaint falls outside regulated activity, Churchbridge Capital will nonetheless apply the same fair and transparent standards set out in this policy.

Note: Where this policy refers to the "Director", this means the individual holding SMF3 responsibility at Churchbridge Capital.

All regulated complaints are handled in close coordination with WSP Capital Ltd as the principal firm.

2. WHAT IS A COMPLAINT?

The FCA (DISP 2.2) defines a complaint as any oral or written expression of dissatisfaction, whether justified or not, from or on behalf of a person about the provision of, or failure to provide, a financial service or a redress determination, which:

- alleges that the complainant has suffered (or may suffer) financial loss, material distress, or material inconvenience; and
- relates to an activity of the firm that falls under the jurisdiction of the Financial Ombudsman Service.

The definition is intentionally broad. The Court of Appeal has confirmed that a complaint may be contained across more than one communication. Churchbridge Capital will therefore interpret the definition widely and prudently — if in doubt, we will treat the expression of dissatisfaction as a complaint and handle it accordingly.

Complaints can be received via any of the following channels:

- Telephone (no premium-rate numbers are used by Churchbridge Capital)
- In-person conversation
- Written letter

- Email
- SMS or other written electronic communication

All complaints, however received, will be logged in the Complaints Register (see Appendix A) and handled in accordance with this policy.

3. ROLES & RESPONSIBILITIES

Churchbridge Capital is a small firm currently operated by the Director (SMF3). The Director holds full responsibility for the investigation, management, and resolution of all complaints. As the firm grows and additional staff are engaged, clear lines of responsibility will be documented and updated in this policy.

The Director's responsibilities in relation to complaints include:

- receiving and acknowledging all complaints in accordance with the required timeframes;
- investigating complaints competently, diligently, and impartially;
- maintaining the Complaints Register and all associated records;
- liaising with WSP Capital Ltd on any regulated complaints or escalations;
- issuing all formal communications to complainants, including holding responses and final response letters;
- reporting complaint data to the FCA via RegData within required timeframes;
- conducting root cause analysis and implementing procedural improvements; and
- ensuring all future staff are trained on and comply with this policy.

All future employees of Churchbridge Capital will be required to sign a copy of this policy to confirm that they have read, understood, and agree to comply with its requirements. Failure to comply may result in disciplinary action.

4. COMPLAINT HANDLING PROCEDURE

4.1 Identify the complaint

Upon receipt of any expression of dissatisfaction, the Director will assess whether it constitutes a complaint under the FCA definition. Where there is any doubt, the matter will be treated as a complaint. An entry will be made in the Complaints Register, recording the date of receipt and all relevant details.

4.2 Obligations Upon Receipt of a Complaint

In accordance with DISP, upon receiving a complaint Churchbridge Capital must:

- investigate the complaint competently, diligently, and impartially, obtaining additional information as necessary;

- assess the complaint fairly, consistently, and promptly, taking into account all relevant factors including the subject matter, whether the complaint should be upheld, what remedial action or redress may be appropriate, and whether another firm may be solely or jointly responsible;
- offer redress or remedial action where appropriate;
- explain clearly, fairly, and promptly our assessment of the complaint, our decision, and any offer of redress; and
- comply promptly with any offer of remedial action or redress accepted by the complainant.

4.3 Complaints Resolved within 3 Business Days

Churchbridge Capital will seek to resolve all complaints as swiftly as possible, ideally within 3 business days of receipt. Where a complaint is resolved within this timeframe, the Director will:

- record the complaint and the agreed resolution in the Complaints Register;
- retain all relevant correspondence on the client's file; and
- promptly issue a Summary Resolution Communication to the complainant confirming:
  - that a complaint was received and is now considered resolved;
  - that if the complainant remains dissatisfied, they may refer the matter to the Financial Ombudsman Service (FOS) within 6 months of this communication (outside of this 6-month period, FOS will only have permission to consider the complaint in very limited circumstances); and
  - the FOS website address and availability of further information.

Note: If a complaint is resolved by close of business on the business day immediately following receipt, no written response is required, though the matter must still be logged.

4.4 Complaints Not Resolved within 3 Business Days

Where a complaint cannot be resolved by close of business on the third business day following receipt, the following procedure applies.

4.5 Acknowledgement within 5 Business Days

A written acknowledgement must be sent to the complainant within 5 business days of receipt of the complaint. This acknowledgement will:

- confirm receipt of the complaint and the date it was received;
- provide the name and job title of the person handling the complaint (the Director);

- enclose or direct the complainant to a copy of this complaint's procedure; and
- confirm that we will keep the complainant updated throughout the investigation.

4.6 Investigation

The Director will conduct a thorough and impartial investigation into the complaint. Throughout the investigation, the Director will maintain regular communication with the complainant, providing updates at least every two weeks. All correspondence and records of communication will be retained on file.

4.7 After 4 Weeks

If the complaint has not been resolved within 4 weeks of receipt, and no final response has been issued, a holding response must be sent to the complainant. This will:

- explain why Churchbridge Capital is not yet in a position to resolve the complaint; and
- indicate when the complainant can expect further contact (which must be no later than 8 weeks from receipt of the complaint).

4.8 After 8 Weeks – Unable to Issue Final Response

If Churchbridge Capital is unable to issue a final response within 8 weeks of receiving the complaint, we will write to the complainant to:

- explain that we are still not in a position to issue a final response;
- outline the reasons for the delay and provide an estimated timeline for resolution; and
- inform the complainant that they may now refer their complaint to FOS if dissatisfied with the delay, enclosing a copy of the FOS explanatory leaflet.

5. FINAL RESPONSE

A Final Response must be issued within 8 weeks of receiving the complaint. The Final Response will:

- summarise the complaint as understood by Churchbridge Capital;
- outline the investigation undertaken and the key facts identified;
- state clearly whether the complaint is upheld, rejected, or partly upheld, and explain the reasons for this decision;
- where the complaint is upheld, set out the redress offered and explain how it has been calculated;
- inform the complainant that they may refer their complaint to FOS within 6 months of the date of the Final Response letter; and
- enclose the FOS explanatory leaflet.

The Final Response will also contain the relevant FOS referral wording as prescribed by DISP, depending on the circumstances of the complaint (see standard wording below).

5.1 Standard FOS Referral Wording

A) Where Churchbridge Capital does not agree to waive the six-month referral time limit:

> *"You have the right to refer your complaint to the Financial Ombudsman Service, free of charge — but you must do so within six months of the date of this letter. If you do not refer your complaint in time, the Ombudsman will not have our permission to consider your complaint and so will only be able to do so in very limited circumstances. For example, if the Ombudsman believes that the delay was as a result of exceptional circumstances."*

B) Where the complaint was received outside the FOS time limits and Churchbridge Capital does not consent to waive such:

> *"You have the right to refer your complaint to the Financial Ombudsman Service, free of charge. The Ombudsman might not be able to consider your complaint if: what you are complaining about happened more than six years ago, and you are complaining more than three years after you realised (or should have realised) that there was a problem. We think that your complaint was made outside of these time limits but this is a matter for the Ombudsman to decide. If you do not refer your complaint to the Ombudsman within six months of the date of this letter, the Ombudsman will not have our permission to consider your complaint and so will only be able to do so in very limited circumstances (for example, where the Ombudsman believes that the delay was as a result of exceptional circumstances)."*

C) Where Churchbridge Capital consents to waive all time limits:

> *"You have the right to refer your complaint to the Financial Ombudsman Service, free of charge. Although there are time limits for referring your complaint to the Ombudsman, we will consent to the Ombudsman considering your complaint even if you refer the complaint outside the time limits."*

6. TIME-BARRED & FORWARDED COMPLAINTS

6.1 Time-Barred Complaints

If a complaint is received that falls outside the FOS referral time limits (more than 6 years after the event, or more than 3 years after the complainant knew or should have known of a problem), Churchbridge Capital may reject the complaint without considering its merits. Where we elect to do so, this will be explained clearly to the complainant in the Final Response, including the relevant FOS referral wording.

6.2 Forwarded Complaints

Where Churchbridge Capital receives a complaint that relates solely or jointly to another firm, we will:

- promptly refer the matter to the appropriate firm;
- notify the complainant of what we have done and provide the other firm's contact details; and
- where we share responsibility, deal with our portion of the complaint in accordance with this policy.

Where a complaint is forwarded to Churchbridge Capital from another firm, the timeframes under this policy apply from the date the forwarded complaint was received by us.

7. RESOLUTION & REDRESS

Where a complaint is upheld, Churchbridge Capital will consider what form of redress is appropriate in the circumstances. Redress may include:

- a formal written apology;
- remedial action to correct an error or process failure;
- financial compensation, calculated appropriately to reflect any loss, distress, or inconvenience suffered; or
- in cases where the complaint relates to a specific finance deal, discussion with the relevant lender with a view to unwinding or amending the arrangement.

Churchbridge Capital will act in good faith in all cases and will follow up with the complainant to confirm that the resolution is satisfactory and that no further detriment has been experienced.

Where we identify through a complaint that a client — or other clients in the same circumstances — have suffered foreseeable harm as a result of our service or processes, we will take prompt and appropriate action under PRIN 2A.2.5 and 2A.2.10, including proactive outreach and redress where necessary.

7.1 Financial Ombudsman Service

If a complainant is not satisfied with Churchbridge Capital’s Final Response, they have the right to refer the complaint to the Financial Ombudsman Service (FOS) free of charge. The referral must be made within 6 months of the date of the Final Response letter.

Financial Ombudsman Service contact details:

The Financial Ombudsman Service

Exchange Tower, London, E14 9SR

Tel: 0800 023 4567 (free from most landlines) | 0300 123 9123 (mobile) | 020 7964 0500 (international)

Email: complaint.info@financial-ombudsman.org.uk

Website: www.financial-ombudsman.org.uk

Churchbridge Capital will co-operate fully with the FOS in resolving any complaints referred to it, will aim to respond to any information requests from the FOS within 2 business days, will be bound by any awards made, and will pay promptly any fees levied by the FOS.

8. RECORD KEEPING

All complaint records must be retained for a minimum of 3 years from the date of receipt of the complaint, in a format that is readily accessible and capable of being reconstituted. Records must not be capable of unauthorised alteration.

Churchbridge Capital maintains its complaint records electronically via Microsoft OneDrive and Microsoft 365. All compliance records are stored in a dedicated, password-protected compliance folder, organised into dated monthly sub-folders to facilitate easy retrieval by the FCA or any other relevant authority. Access to these records is restricted to the Director and any authorised personnel.

The Complaints Register (Appendix A) must be updated for every complaint received, regardless of how quickly it is resolved.

9. FCA REPORTING

Churchbridge Capital will submit its Complaints Data Return (CCR) via FCA RegData within 6 weeks of the firm's financial year end. The frequency of reporting will be:

- Annually — where the firm's annual income is less than £5 million; or
- Twice per year — where the firm's annual income exceeds £5 million.

The Director (SMF3) is responsible for reviewing all submissions and ensuring the accuracy and completeness of data provided. As an Appointed Representative, Churchbridge Capital will coordinate with WSP Capital Ltd in respect of any regulatory reporting that falls to the principal firm.

The CCR return will specify the total number of complaints received that were not resolved by close of business on the third business day after receipt, in accordance with DISP 1.5.4.

10. ANALYSING COMPLAINTS & ROOT CAUSE ANALYSIS

10.1 Complaints Analysis

Churchbridge Capital will use complaint data as a key indicator of whether the Firm is meeting its Consumer Duty obligations and delivering good client outcomes. Data sources reviewed will include:

- client feedback received at the close of each transaction;
- formal complaints and their outcomes;
- feedback from lenders and introducer partners;
- reviews posted on external platforms; and

- feedback from external compliance consultants.

The Director will review this data regularly and will implement changes to policies, processes, or training where patterns or systemic issues are identified.

10.2 Root Cause Analysis

In accordance with DISP rules, Churchbridge Capital will take steps to identify and remedy any recurring or systemic problems that give rise to complaints. Where a complaint is received, the Director will:

- conduct a root cause analysis to identify the underlying cause of the complaint;
- assess whether the cause reflects a broader systemic issue that may have affected other clients;
- implement process changes or procedural improvements to prevent recurrence;
- consider whether any other clients who may have suffered the same issue require proactive contact or redress; and
- use any FOS decisions to inform and improve our procedures.

Given the firm's current size, root cause analysis will be conducted on an ad hoc basis at the point each complaint is received, rather than on a scheduled periodic basis. As the firm grows, a formal quarterly review process will be implemented.

10.3 Monitoring Improvements

All changes implemented as a result of root cause analysis will be documented in the Complaints Register and the firm's broader compliance records, along with the date of implementation and the outcome achieved. The Director will monitor whether improvements have been effective and will revisit them as necessary.

Churchbridge Capital acknowledges that complaints, while unwelcome, represent an important source of insight into the client experience. We are committed to using this feedback constructively to continuously improve our service standards and client outcomes.

11. CONSUMER DUTY ALIGNMENT

This policy operates within Churchbridge Capital's broader Consumer Duty framework. Under PRIN 2A, the Firm must act to deliver good outcomes for retail customers. Complaints handling is a key mechanism by which we identify where outcomes have fallen short and take corrective action.

Specifically, in the context of Consumer Duty:

- complaints will be assessed not only for individual resolution, but for what they indicate about the outcomes our clients are experiencing;
- where complaints data identifies that clients are receiving worse outcomes, the Director will take proactive steps to address the root cause, including outreach to affected clients where appropriate;
- complaints trends will inform the firm's Consumer Duty Annual Board Report; and
- the Firm will consider developing a structured client feedback process (including optional post-transaction questionnaires) to supplement formal complaints data in assessing Consumer Duty compliance.

As an AR of WSP Capital Ltd, Churchbridge Capital's Consumer Duty obligations are overseen by the principal firm, and all relevant data and reporting will be shared with WSP Capital Ltd as required.

APPENDIX A: COMPLAINTS LOG

No	Complainant	Complaint Code	Date Rec'd	Date Initial Letter sent	Date Final Response sent	A - Accept R - Reject	Eligible Y / N	FOS Y / N	U - Upheld / R - Rejected	Compensation £	Date Closed	Complaint against Individual	Complaints Notification sent to FCA
1													
2													
3													
4													
5													
6													
7													
8													
9													

APPENDIX B: CLASSIFICATIONS TO BE USED

Complaint Classifications to be used:

Classifications	Code
Overcharging	OVER CH
Delays	DELAYS
Other Administration	ADMIN
Misleading Advice	MIS ADV
Failure to Carry Out Instructions	FAIL INSTR
Poor Customer Service	SERVICE
Misleading Advertising	ADVERT
Disputes Over Amounts Payable	MONEY
Switching or Churning	CHURN
Breach of Contract	CONTRACT
Other	OTHER