



**BANKING  
CIRCLE**

# Complaints Policy

26 February 2026

## 1. Client satisfaction

At Banking Circle Australia (“Banking Circle”) we are committed to delivering the best possible service and to supporting you with any concerns or complaints you may have as quickly and thoroughly as possible.

In our capacity as an intermediary payment service provider, Banking Circle processes payment transactions on behalf of our bank and non-bank payment service providers “clients”. Our clients have their own customers, who have no direct relationship with Banking Circle. Banking Circle provides virtual accounts, i.e. unique payment account numbers, to many of our clients, under the Banking Circle name. Our clients assign these virtual accounts, at their discretion, to their own customers account for sending and receiving payments from external parties. Note that our clients, not Banking Circle, hold the balances on their own customer accounts. Our clients, or your bank, must first authorise the transaction, before Banking Circle processes the payment. It is possible that fraudulent transactions, particularly from scam activities, can from time to time, evade both our own and our client’s fraud detection controls.

Banking Circle occasionally receives scam complaints directly from an individual or business whose funds were paid into a virtual account held by one of our clients' customers. In these cases, we will forward the complaint to the relevant client, who is responsible for onboarding and managing that account holder, for investigation and any follow-up action. Once the complaint has been forwarded to our client, Banking Circle promptly responds to the original complaint, and informs the complainant of the reasons why their complaint has been forwarded to our client and, with our client’s consent, Banking Circle will provide the complainant with our client’s contact details for the complaint to be resolved directly.

Working with our client, we will do all we can to help investigate your concerns and you informed on the progress and next steps. Please bear in mind that scammers will typically withdraw funds so we recommend that claims should be quickly handled through official channels including filing both a police report and a claim directly with your own bank or credit card issuer.

### (a) Initial step – contact customer service and enquire on status

Prior to filing a complaint, we request that you first make an enquiry into our local Australian team who will make initial enquiries and respond to you promptly.

If you feel that a scam or fraud related crime has occurred and have not already done so, we recommend that you file a police report and also file a claim directly with your own bank or card issuer.

If you feel that your enquiry still was not handled in a timely manner, you have the option to file a complaint with us.

### (b) Filing a complaint with us if your enquiry is not resolved quickly

Management oversight of complaints is monitored through regular internal review and reporting.

A complaint can be any written, verbal or electronic communication from a client, a former client, their associated counterparties or an entity who did not complete the on-boarding process due to Banking Circle’s eligibility criteria not being met, to express dissatisfaction and can be submitted free of charge.

If you wish to express your dissatisfaction/complaint, do not hesitate to contact your Client Relationship Manager or any other direct contact within Banking Circle in the first instance.

You can also submit your statement through our [website](#).



When contacting Banking Circle with a complaint, please include the following details:

- Your full name and the name of your company
- Your role on the account (e.g. accountholder or representative of a client, lawyer etc.)
- Your contact details
- Involved account number(s)
- Information pertaining to the complaint (detailed description of the facts underlying the complaint)
- Relevant document(s) and/or correspondence
- Any other detail(s) of relevance regarding your complaint.

If we are not able to provide you with an answer within a short time, an acknowledgement of your complaint will be issued by return email, within a reasonable time from the date of receipt. We will provide you with a reference number and the contact details of a case manager, who will be in charge of handling the complaint together with an indicative timeline of when a response or resolution will be provided.

**DISCLAIMER:**

Please note that we cannot process or respond to any complaints, inquiries, or fraud reports unless all required and necessary information is provided. Incomplete submissions may result in delays or an inability to address your issue. By submitting your information, you acknowledge that your personal data will be handled in accordance with our Privacy Policy. This may include sharing your data with our clients as necessary for the investigation or resolution of your request.

