

## Complaints Policy and Procedure

### 1. Purpose

- a) This document represents our policy towards complaints, how a consumer can make them and how as a company we handle them.
- b) This policy and procedure have been created to meet general standards and requirements and complies with standard complaint handling procedures, including the Financial Ombudsman Service (FOS) and FCA regulations such as CONC and DISP.
- c) We take our responsibilities seriously, in addition to the legal and regulatory requirements we have as a financial firm.
- d) We are committed to ensuring the fair treatment of our consumers and ensuring they face no post sale barriers with our service, and we have effective and transparent procedures in place.
- e) As a business we ensure that complaints can be made using any reasonable means and recognise complaints require a resolution.

### 2. Definition

As per FCA material, they define a complaint as the following –

*‘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, claims management service or a redress determination, which alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience.’*

### 3. Customer Complaints Procedure

‘Our aim is always to provide an exceptionally high level of service to all of our customers. Where customers are unsatisfied, it’s important to us that this is dealt with objectively, fairly and as quickly as we are able to.

The following procedure explains how we deal with complaints, our commitments to you and what action to take if you think your complaint has not been resolved to your satisfaction.

If you have a complaint about any aspect of our service, then we would like to hear from you. Please use the below details to let us know –

**E: [sales@reallyeasycarcredit.co.uk](mailto:sales@reallyeasycarcredit.co.uk)**

**T: 0191 580 4227**

**P: Unit 4 Elm Road, North Shields, NE29 8SE**

We kindly ask, so we can look into your complaint as quickly as possible. You include as much detail as you can, however if we are missing anything we will be in touch. We will aim to come back to you within 48 working hours of receiving your complaint.

If we are able to investigate and resolve your complaint within 3 days, you will receive a summary resolution response from ourselves, which will detail our outcome and findings.

In the event our investigations take longer than 3 days, we will issue you a Final Response within the 8-week timescale. Whilst we try to close any complaint before this 8-week time frame, we do need to make you aware we do have this time. Our final response will include detailed information of your

complaint, our investigation and the resolution we have come to. If you are not satisfied with our Final Response or the handling of your complaint within the 8-week time frame, you can contact the Financial Ombudsman service using the details below. You must do this within six months of our final response.

W: [www.financial-ombudsman.org.uk](http://www.financial-ombudsman.org.uk)

T: 0800 023 4567

P: Exchange Tower, Harbour Exchange, London, E14 9SR

*Please note, should your complaint be regarding a car finance agreement and/or discretionary commission arrangement ('DCA') before 28<sup>th</sup> January 2021, we need to make you aware that the current 8 week deadline to respond to your complaint is currently paused. This is due to the investigation and review the FCA are carrying out within the Motor Finance Industry regarding the handling of such complaints. Please note we will still work hard to resolve your complaint in the background and keep you updated throughout the process; however we need to make you aware that we will not have to respond to your complaint with a Final Response until after 4th December 2025 at the earliest.*

*Please note should your complaint be regarding a Non-DCA Commission Disclosure and was made on or after 26th October 2024, the same extension is in place and we have until after 4th December 2025 to provide you with a Final Response.*

*We also need to make you aware that if you are unhappy with your response, the FCA has extended the deadline in which you can refer your complaint to the Financial Ombudsman Service (for these types of complaints only).*

If you're sent a final response between **12 July 2023 and 29 April 2025**, you'll now have until 29 July 2026 to take your complaint to the Financial Ombudsman.

If you're sent a final response between **30 April 2025 and 29 January 2026** you'll have 15 months from the date the final response is sent to refer your complaint to the Financial Ombudsman.

*You can find further information on the work the FCA is carrying out via this link- <https://www.fca.org.uk/carfinance>.*

#### **4. Processes and Responsibilities**

##### *1. Record Keeping*

- a) As per DISP 1.9 and to ensure that we handle our complaints efficiently and effectively, any correspondence or notes from phone communication will be documented on our Autoconvert system.
- b) This will allow the complaints handler to review the whole complaint and refer back to any point in the investigation if they are required to do so.
- c) Any documentation received regarding the complaint will also be uploaded to the application.
- d) All records of complaints will be kept as per our retention periods, only employees that require access to customer complaint notes will be granted this information.
- e) We aim to resolve all complaints as soon as possible to minimise the number of open complaints (DISP1.4.3).

## 2. Training

- a) Staff will receive complaints training within their initial induction and at least once a year.
- b) Training will ensure our team understands the processes that we have in place and the regulatory importance of following these processes.
- c) At any time, staff have the opportunity to request further training on any aspect of our business.

## 3. Treating Customers Fairly (TCF)

- a) As a company, we ensure that we follow all regulatory guidelines, including treating customers fairly.
- b) When it comes to complaints, we guarantee that our customers will not face any post sale barriers.
- c) Our staff are aware that they need to assist customers as much as possible when they wish to make a complaint, and they should not receive a different service to any other customer.
- d) As per DISP 1.3.2 customers are made aware they can make a complaint verbally or in writing and these contact details are provided in our complaint's procedure for ease for the customer.
- e) We will ensure that our complaints procedure is in a clear location so our consumers can access it with ease. To ensure we are in compliance with DISP 1.2, our complaints procedure is clearly listed on our website and a copy will be sent via email.
- f) Specifically, to meet DISP 1.2, our complaints procedure will also detail contact details for the FOS.
- g) Customers will have their expectations managed, and staff will explain the complaints process so a customer can understand the next steps.
- h) As per DISP 1.4.1, we will thoroughly investigate any complaint competently, diligently and impartially, ensuring that any evidence obtained is saved to the customers application for record.
- i) In line with 1.4.2 all factors of the customer journey and outcome will be considered in our investigations.
- j) We will keep in constant communication with all parties, including our finance partners, ensuring we keep in touch at least once a week whilst investigations are taking place.
- k) We will assess fairly, consistently, and promptly
  - the subject matter of the complaint.
  - whether the complaint should be upheld.
  - what remedial action or redress (or both) may be appropriate.
  - if appropriate, whether it has reasonable grounds to be satisfied that another respondent may be solely or jointly responsible for the matter alleged in the complaint.
- l) All communication received will be acknowledged within 48 hours, as per DISP 1.6.1.
- m) If a customer makes a complaint about a specific member of the team, that employee will not have any involvement in handling the customer's complaint.
- n) Customers will never be charged for making a complaint, no matter what method of communication they use (DISP 1.3.1).

- o) Where a customer has referred a complaint to the FOS, we will fully comply with any further investigations and comply promptly with any settlements or rewards in line with DISP1.4.4.
- p) At any point in our trading future, we are required to publish our complaints data due to the number of complaints received, we will ensure this is easily available to our customers and contains all the required information and in the time limits required. We will inform the FCA in writing as and when this has been actioned.
- q) As per DISP 1.8, should we receive a complaint which is outside of the time limit (as detailed in DISP 2.8) for referral to the FOS and we reject the complaint, we will provide a full explanation of this to the complainant.
- r) For reference these time limits are as follows -
  - *more than six months after the date on which we sent our final response, redress determination or summary resolution communication*
  - *More than six years after the event complained of*
  - *three years from the date on which the complainant became aware (or ought reasonably to have become aware) that they had cause for complaint*

#### 4. *Summary Resolution*

- a) In line with DISP 1.5 we have put in the following process should we resolve the complaint within 3 working business days.
- b) Once resolved, we will send the customer a Summary Resolution using our templates.
- c) This will include details of how the customer can refer their complaint to FOS should they wish to if they are not satisfied with our response, the time limits able to do this and that we consider the complaint closed.
- d) Depending on the customer's circumstance, and if it is deemed easier or preferred for the customer, we may communicate this resolution via other methods such as telephone.

#### 5. *Redress and Compensation*

- a) Compensation or redress will be decided on an individual basis and detailed to the customer in our final communication.
- b) Management will take into account all aspects of the complaint and any suffering caused to the customer and offer compensation based on these aspects and per regulation.
- c) Where Compensation and redress is considered or decided, we will ensure all factors have been taken into account including all evidence obtained and regulation set out by the FCA and FOS.
- d) Compensation or redress may also involve agreements with finance partners, to determine an overall decision, and where application all communication and decision will be documented.
- e) As with all complaint records, redress and compensation will be recorded so we are able to report amounts to the regulator.

#### 6. *Point of Contact*

- a) As per DISP 1.3.7, the firm has appointed Steven to currently handle all complaints and SQ issues.
- b) We will ensure this information remains clear and up to date on our FCA register.

- c) As the firm grows and moves forward, we will consistently review Steven's ability to carry out this responsibility and regularly review their knowledge and training to ensure they are competent in their responsibilities.
- d) We will request an email or detailed description over the phone to handle the complaint further.
- e) They will then liaise with the customer and any third parties as required (and in line with DISP 1.7.1) and issue a final response letter or summary resolution.
- f) If in the event or circumstance we are required to forward the complaint, we will do so promptly and inform the customer that we have done so.
- g) We are committed to ensuring that we are in control of all complaints and complete them as soon as possible.
- h) Steven will ensure all complaints are updated on the complaints log, system and compliance monitoring plan.
- i) Templates will be used when liaising with customers for acknowledgement (including initial and holding letters), Summary Resolution and Final Response Letters to ensure that the customer receives information required in DISP such as (but not limited to) 1.6.1 and 1.6.2.
- j) This will include:
  - a. Acceptance or rejection of the complaint
  - b. Information on any redress offered and agreed on
  - c. Information on how the customer can contact FOS and the time limits applicable
  - d. FOS explanatory leaflet
- k) If we cannot provide the customer with a final response in 8 weeks, we will ensure a holding letter is provided that will include:
  - a. Why we are unable to provide this
  - b. A timeframe of when we believe we will be able to
  - c. Informing they are able to contact FOS and the contact details to do so
  - d. FOS explanatory leaflet
- l) If we are able to resolve the complaint before the 8-week period, the final response will be sent as soon as possible.
- m) All correspondence with customers will be clear, fair and not misleading. Where information such as FOS details is required to be prominent, this will be done so.

#### 7. *SQ vs. Complaint*

- a) It is important that we can differentiate between a complaint and an SQ issue.
- b) Whilst they are different, we do adopt the same principles, and try to assist our consumers rectify any issues they have with their vehicle.
- c) We provide this service as an extension to our offerings in the hope we can make the consumer's journey as easy as possible.
- d) We will assist liaising with the broker/lender if necessary, to try to come to an arrangement to provide our consumer with the vehicle they desire.
- e) All SQ's will be documented on our complaints log for management information purposes, which assists in providing additional information on their service/business activities.
- f) Root analysis may be conducted on specific issues.
- g) To ensure we meet DISP 1.3.2A, we are committed to learning from all complaints and SQ issues received, ensuring we are analysing any patterns produced or guidance received.

- h) As per DISP 1.3.3 we will ensure appropriate management controls are in place to identify and remedy any recurring or systematic problems, both with regulated and SQ complaints.
- i) The following processes and training have been implemented to include:
  - a. How to identify a root cause
  - b. How to prioritise
  - c. to consider whether any information could impact other aspects of our process and policies, and if action is required
  - d. if action needs to be taken to amend a certain process and implement a timeframe and actions as to when and how this will be done
  - e. keeping records of all changes and ensure version control rules are met
- j) Should issues or problems be identified and other customers who may not have come forward be (or suspected to be impacted) we will take appropriate action to contact those customers and if applicable, take steps to remedy the problem, obtain a solution or calculate redress (as per DISP 1.3.6)

#### 8. *The FCA's Motor Finance DCA Complaints Review*

- a) On the 11<sup>th</sup> January 2024 the Financial Conduct Authority (FCA) announced their intention to review historical motor finance discretionary commission arrangements (DCA's) across the motor finance industry.
- b) As per DISP App 5.1.1 (3), all rules and guidance and DISP continue to apply to a relevant motor finance DCA complaint unless otherwise stated, therefore all other aspects of this policy still apply.
- c) The FCA, as per DISP app 5.1.2 have determined that a relevant motor finance DCA Complaints is a complaint where:
  - 1. the subject matter of the complaint relates, in whole or part, to a regulated credit agreement entered into before 28 January 2021;
  - 2. the regulated credit agreement, in whole or part, financed the purchase of a motor vehicle, or a motor vehicle was bailed or hired under the agreement;
  - 3. there were arrangements between the lender and a credit broker relating to the entering into of that agreement that included a discretionary commission arrangement; and
  - 4. the respondent:
    - (i) received the complaint in the period beginning with 17 November 2023 and ending with 4 December 2025; or
    - (ii) sent a final response to the complaint in the period beginning with 12 July 2023 and ending with 29 January 2026.
- d) Regarding time limits and responding to customers, where a final response has been sent in the period beginning 12th July 2023 and ending with 20th November 2024, the 6 month period as detailed in DISP 2.8.2R(1) in relation to customers referring their complaint to the FOS is extended to 15 months.

- e) This rule applies in respect of a relevant motor finance DCA complaint where a final response is sent in the period beginning with 11 January 2024 and ending with 20 November 2024.
- f) Where a final response has been sent regarding a non-DCA complaint in the period beginning with 21 June 2024 and ending with 29 April 2025, DISP 2.8.2R(1) is modified so that the Ombudsman cannot consider a complaint if it is referred to the Financial Ombudsman Service on or after 30 July 2026.
- g) If a final response is sent regarding a non-DCA complaint in the period beginning with 30 April 2025 and ending with 29 January 2026, DISP 2.8.2R(1) is modified so that the Ombudsman cannot consider a complaint if it is referred to the Financial Ombudsman Service more than fifteen months after the date on which the respondent sent the complainant its final response.
- h) To ensure customers are fully aware of this change, this has been amended within our complaints procedure and complaints communication templates.
- i) Any impacted customers have been informed of this change in writing and we have ensured in order to support our customers, we have included the link to the FCAs resource page for customers, and made it clear we are available to answer any further queries.
- j) The FCA have also stated that they are pausing the 8 week deadline Motor Finance firms have to respond to customers in relation to DCA Complaints.
- k) Time is to be treated as not running for the period beginning with 11 January 2024 and ending with 4 December 2025 following the update from the FCA in September 2024.
- l) As of December 2024, the FCA also advised following the Court of Appeals decision in Hopcraft, Johnson and Wrench in October 2024, non-DCA Commission disclosure complaints are also included within the December 2025 Final Response extension.
- m) As per DISP App 5.1.3A, a motor finance non-DCA complaint is a complaint where -
  - (1) the subject matter of the complaint relates, in whole or part, to a regulated credit agreement or a regulated consumer hire agreement;
  - (2) the regulated credit agreement or the regulated consumer hire agreement, in whole or part, financed the purchase of a motor vehicle, or a motor vehicle was bailed or hired under the agreement;
  - (3) there were arrangements between the lender or owner and a credit broker relating to the entering into of that agreement that provided for the payment (directly or indirectly) of any commission, fee or other financial consideration or remuneration including a benefit of any kind to the credit broker;
  - (4) the complaint is not a relevant motor finance DCA complaint as defined in DISP App 5.1.2R; and
  - (5) the respondent:
    - (a) received the complaint in the period beginning with 26 October 2024 and ending with 4 December 2025; or
    - (b) sent a final response to the complaint in the period beginning with 21 June 2024 and ending with 29 January 2026.

- n) We have ensured information regarding the extensions is clear in our customer complaints procedure, and are suitably knowledgeable to answer any questions the customer may have regarding the extensions.
- o) As per DISP 5.2.5 we will promptly ensure that the customer is aware of any changes regarding the time limits or extensions in writing and refer them to [fca.org.uk/car-finance-complaints](https://www.fca.org.uk/car-finance-complaints) which details the reason for this pause.
- p) This includes customers who may have made a complaint regarding non-DCA commission during the time period 26th October 2024 and 19th December 2024 but did not receive a final response during that time.
- q) To ensure we are abiding by other regulations such as the Consumer Support Outcome of the Consumer Duty, we will keep up to date and in touch with the customer throughout this period to keep them informed of any investigations and updates, and be on hand to answer any queries.
- r) As per DISP 5.3.1, DISP5.3.1A and DISP5.3.2 and the Record Keeping clause of this policy (Section 4.1) we will ensure we retain and preserve all records securely.
- s) In line with the FCA's update in December 2024 (PS24-18 2.50), complaint information is required to be kept for 3 years, which we will be following.
- t) As the FCA have also stated within the December 2024 update, they may revisit this so we will observe caution as revisit if the data can be destroyed closer to the date.
- u) Records include the following information where we have access to such information -
  - i) a copy of the regulated credit agreement;
  - ii) records of the commission arrangements relating to the regulated credit agreement;
  - iii) records of any commission, fee or other financial consideration paid (directly or indirectly) in connection with the regulated credit agreement, including details of its structure and calculation;
  - iv) customer files and records, including any agreement setting out the nature of the services offered, any customer transactions and payments; and
  - v) communications with the customer.
- v) As a firm we are committed to ensuring we will remain up to date with the FCA's investigation into DCA and non-DCA commission Complaints, and will ensure we abide by the Conduct Rules and our responsibility as a regulated firm in being open and co-operative if any information is requested from the FCA or FOS.

## 5. Monitoring and Compliance

- a. It is extremely important that this policy is complied with to protect our consumers. As a company we will ensure that we keep up to date with regulatory and legal requirements, and that our processes and policies are updated accordingly to meet regulation (DISP, CONC, Consumer Duty)
- b. We may conduct root analysis on our complaints to identify any patterns that may potentially form, therefore limiting risk to our consumers.
- c. All complaint information will be reported within our RegData as per DISP 1.10 rules and guidance or upon request. We will ensure that all information requested by the FCA including but not limited to total amount, amount closed, amount open and redress paid, is accurate, honest and up to date as per the Reg Data system. We do not

anticipate meeting the 500-complaint threshold in the near future but will continue to review processes and implement necessary reporting requirements when required.

- d. In the event a complaint identifies an area of concern within our procedure, this will be assessed and rectified where applicable.
- e. Failure to comply with this policy by any staff member will result in possible disciplinary action or additional actions by the firm.

#### **6. Review and Monitoring**

- a. This policy will be reviewed on at least an annual basis and version controlled to evidence the date last updated.
- b. Any updates will be reissued on this policy and redistributed within the firm.
- c. All policy changes are approved by Steven. They are responsible for ensuring the implementation and oversight of this policy within the firm.

#### **7. Employee Confirmation**

By signing the below, you can confirm that you have fully read and understood the above policy, received adequate training on the subject and provided the opportunity to ask any questions. Breaching the responsibilities in this policy may result in disciplinary action, therefore you can confirm you will carry out the above duties in a compliant manner and in line with company policy.

**SIGNED:**

**NAME:**

**DATE:**