

Policy – Complaint Handling Policy

Introduction

1. This document has been produced to set out the policy and standards that are required by “Zoe AI Limited (Zoe)” to comply with the Complaints Handling Process relating to the products and services that Zoe offers and is to be read in conjunction with the Complaints Process Document.
2. The document “Zoe AI Process for Complaint Handling” is written in conjunction with this document.

Purpose

1. The purpose of this policy and related standards is to ensure that customers who complain about Zoe products and services are provided with a fair resolution and are given appropriate information and redress. In doing so, we will adhere to the following Statutory and/or Regulatory Obligations where relevant:
 - a. Financial Conduct Authority, Principles for Businesses – These are a general statement of the fundamental obligations under the regulatory system. The main principles relating to this policy are:
 - Integrity - A firm must conduct its business with integrity.
 - Skill, care and diligence - A firm must conduct its business with due skill, care and diligence.
 - Customers' interests - A firm must pay due regard to the interests of its customers and treat them fairly.
 - Communications with clients - A firm must pay due regard to the information needs of its clients, and communicate information to them in a way which is clear, fair and not misleading.
 - b. Financial Conduct Authority, SYSC 3.1 Systems and Controls – A firm must take reasonable care to establish and maintain such systems and controls as are appropriate to its business.
 - c. Financial Conduct Authority, DISP Dispute Resolution: Complaints - sets out how complaints are to be dealt with.

Scope

1. The policy covers all of the products, services and operations of Zoe including; outsource suppliers, claims fulfilment operations and applies to all employees of them, any contractors, and franchisees.

Our Policy

1. The following principles should be adhered to in order to comply with the Customer Complaints Handling Process:
 - We will always do our best for our customers but unfortunately there may be times when things go wrong. We view a complaint as an opportunity to improve our relationship with the customer and give them every reason to stay with Zoe.
 - We always ensure that we understand a complaint from the individual customer's perspective and consider their personal circumstances in reaching a fair outcome.
 - We continually monitor all aspects of our complaint handling and utilise this information
 - to make improvements to our products and services.

Our Standards

1. Our Standards set out the requirements for delivering against our Complaint Handling Policy.

2. Principle a)

Customers and their representatives are able to make complaints by any means including by, e-mail, web chat, phone, letter, and verbally. We will ensure there are no barriers preventing them doing so.

The Policy owner must ensure that:

- Where a complaint relates to a product or service within Financial Conduct Authority jurisdiction we have a 'customer complaints policy' leaflet which set outs who customers can complain to, how to complain and which summarises how we'll deal with those complaints.
 - Front line employees are aware of what a complaint is and what action they must take when they are the recipient of one.
 - There are no barriers to a customer or their authorised representative making a complaint on the customer's behalf.
3. Principle b)

We will make every effort to resolve the complaint, to the customer's satisfaction, at first point of contact. If we are unable to do so the matter will be referred to a

manager for investigation, escalated where necessary and the customer informed of the steps we propose to take.

The Policy owner must ensure that:

- A record is made of the first contact (telephone, face to face or in writing) in our business systems, detailing:
 - a. The nature of the complaint
 - b. What action is necessary to resolve it
 - c. Any escalation to management
 - d. The action taken (including escalation) and;
 - e. Whether it has been resolved to the customers satisfaction or;
 - f. Is passed to a manager for further investigation/ follow up.
- For all cases a record is made on our business systems
- For complaints within Financial Conduct Authority jurisdiction a written acknowledgement is sent if the case remains open beyond the 3rd business day following receipt.
- Where the complaint relates to a product or service within Financial Conduct Authority jurisdiction the customer acknowledgement is accompanied by a copy of the 'customer complaints policy' leaflet.

4. Principle c)

We will conduct all investigations impartially, thoroughly and promptly with a view to agreeing a fair outcome.

The Policy owner must ensure that:

- We contact the customer or their representative via their preferred channel to confirm who is personally investigating their complaint, to validate our understanding of their complaint (with reference to their telephone calls to us, our systems records, their written complaint) to agree the action we will take to investigate/resolve the complaint and provide an indication of a timeframe for our response where possible.
- We verify the identity of the customer/their representative following our data protection guidelines.

- Our investigation file includes a full written record, capable of being read and understood independently, of:
 - g. All contacts with the customer/their representative, including written and verbal.
 - h. Requests for assistance and the outcome of any colleagues efforts to help investigate /resolve the case which will include visits to the customer's home.
 - i. The correct systems categorisation of the case to support management and regulatory reporting as well as root cause analysis.
 - j. Our investigation of each point raised by the customer including the review of correspondence, systems records and call recordings, the action taken to investigate each, corrective actions taken and the outcome.
 - k. A record of how we reached a conclusion; with our rationale on each of the points raised by the customer
 - l. Requests for assistance and the outcome of any colleagues efforts to help.
 - m. investigate /resolve the case which will include visits to the customer's home.
 - n. A record of the calculation and basis of any redress being offered.
 - o. Where appropriate confirmation received from management, confirming (f) and (g) above.
 - p. Our conversations with the customer/their representative agreeing the outcome of the investigation and explaining what, if any, options there are for the customer to choose from including compensation, ex-gratia payments.
 - q. Where applicable our final management response which confirms in writing the outcome of our investigation and our agreed resolution.
- In the course of our investigation customer communications / correspondence will:
 - r. Reflect the customers'/their representatives' preferred method of communication.
 - s. Be at all times clear, fair, accurate and engaging.
 - t. Contain evidence that we have personalised the contact by using the customer's name.
 - u. Be professional, well-structured and being capable of being understood by someone not involved in the case.

5. Principle d)

Where the complaint relates to a product or service which falls within Financial Conduct Authority jurisdiction the customer will be given the opportunity to use the Financial Ombudsman Service.

The Policy owner must ensure that:

- Where the customer has indicated acceptance of a response to a complaint by the end of the 3rd business day we will send a Summary Resolution Communication which will:
 - v. Refer to the fact that a complaint has been made and informs them that we consider the complaint resolved.
 - w. Tell the customer that if they remain dissatisfied they may be able to refer the complaint to the Financial Ombudsman Service.
 - x. Indicate whether we consent to waive the time limits in DISP 2.8.2.
 - y. Provide the website address of the Financial Service Ombudsman.
 - z. Refer to the availability of further information on the Financial Ombudsman Service website.
- If we are unable to deal with the complaint satisfactorily at first point of contact or by the end of the 3rd business day we will:
 - aa. Send the customer/their representative our complaints policy leaflet and this contains the address and contact telephone number of the Financial Ombudsman Service.
 - bb. Escalate the complaint to our Approved Person for investigation

6. Principle e)

Where the complaint doesn't relate to a product or service that falls within the Financial Conduct Authority jurisdiction we will comply with the requirements of the Alternative Dispute Resolution Directive.

The Policy owner must ensure that:

- Where we have exhausted our complaint handling process, and not reached an agreed outcome or resolution, the customer will be provided with a written response which will:
 - cc. Inform them of their right to refer the matter to the appropriate/appointed Alternative Dispute Resolution provider if they remain dissatisfied.
 - dd. Indicate that they can obtain more information from appropriate/appointed Alternative Dispute Resolution provider's website and how to locate this.
 - ee. Provide contact details for appropriate/appointed Alternative Dispute Resolution provider, including phone number, postal address and email address.

7. Principle f)

We will deal with all complaint investigations in a timely manner. All complaints that cannot be resolved within 72 hours will be escalated. We aim to send the customer a final response within 8 weeks of when the first complaint was made. If the complaint is still not resolved within 8 weeks we will send the customer a status update on the complaint with an indication of when the final response can be expected.

The Policy owner must ensure that:

- We will aim to resolve every complaint fairly and to the satisfaction of the customer/ their representative and escalate promptly to our Approved Person for any complaint that remains unresolved.

8. Principle g)

We will take lessons from each complaint/conduct root cause analysis to help us continuously improve our customer service.

The Policy owner must ensure that:

- Capture sufficient information from each complaint to allow root cause analysis of the complaint and across a series of complaints.
- Use the root cause analysis to inform the development of individuals.
- Review trends across a series of case outcomes including a review of the outcomes from cases referred to the Financial Ombudsman Service and establish whether any wider customer detriment issues exist where further action is required.

Responsible Person

1. The Approved Person for Zoe AI, Guy Conway, is responsible for communicating, applying and ensuring adherence to the Complaint Handling Policy and Standards set out in this document, through effective management and governance systems.
2. Compliance with the Policy and Standards will be subject to periodic independent testing. The Approved Person for Zoe AI, Guy Conway, will act as Customer Services principle contact for responding to internal and external audits, reviews, and requests for information.



Date Reviewed: 15/OCT/2018

3. Guy Conway, in their role as Approved Person for Complaint Handling Journey and Customer Experience is accountable for the implementation of the Policy and Standards.

4. In the event the Approved Person for Zoe AI, Guy Conway, is not in position, the CEO assumes adherence to the Complaint Handling Policy and Standards set out in this document.