

Complaints Policy

LA Orange Ltd (t/a Jeton) aspires to provide a high quality of service to its customers. In this context, the Firm strives to deal with complaints promptly and fairly and welcomes any feedback on the service it provides. To ensure that complaints are dealt with effectively, the Firm has adopted the Complaints Procedure outlined below.

This policy has been drafted in accordance with the FCA's Dispute Resolution Rules (DISP) and the Payment Services Regulations 2017.

Policy Statement

Complaints and other forms of feedback provide valuable information about clients' satisfaction levels and give an opportunity for improvement. We may receive a complaint as an expression of dissatisfaction which refer to our organisation, staff member or services.

Complaints will be accepted and investigated irrespective of the nature of the complaint or who the person making the complaint is. Jeton is committed to resolve complaints fairly, reasonably and as quickly as possible, and to ensure that it is treating all customers fairly, we must ensure that the Company maintains high service standards. This policy does not cover complaints from staff, for such, please refer to the Whistleblowing Policy.

Handling Complaints

Complaint Definition

Jeton must handle all complaints competently, diligently and impartially to ensure that we satisfy our regulatory requirements and respond effectively to its customers, we must understand what a complaint is.

As per the FCA's definition, a complaint is:

- An expression of dissatisfaction, written or verbal, whether justified or not
- Relating to the goods or services provided by Jeton as an agent
- Alleging financial loss, material distress or material inconvenience

All three elements must be present for a complaint. A query is where there is no expression of dissatisfaction, but rather a request for information or clarification. Queries, or other complaints made to Jeton that do not fulfil all three elements above, still must be resolved correctly and within a reasonable amount of time as they may become a complaint.

Customer Awareness

All written customer complaints should be directed to compliance@jeton.com

Whilst advice of this channel's existence is made through the complaint summary on the firm's website at www.jeton.com , it must also be notified on all promotional material and issued to customers.

- upon request
- immediately before we enter a contract/point of sale
- when acknowledging a complaint

A customer may wish to express their complaint verbally. Should a customer choose to make an oral complaint then the Jeton employee must record details of the concern and send to the compliance@jeton.com mailbox, even if the employee or an immediate colleague is the subject of the complaint.

Complaints Management Process

Stage One – Receipt of a complaint:

Upon the receipt of a complaint the firm must:

- acknowledge receipt of the complaint to the customer, by sending a prompt written acknowledgment;
- log the complaint, noting whether the firm's alleged failure related to the provision of payment services;
- pass the complaint to the designated complaint handler in the relevant division and jurisdiction for resolution; and
- retain communication with the Jeton handler to ensure that it is addressed in line with requirements of 'Recording Complaints' below.

If the complaint handler is unsure of the nature of the complaint, they must seek further information clarification from the customer in order to conduct a fair and thorough investigation. Notwithstanding that a Final Response letter (please see Customer Communication Timescales section) must be issued to the complainant within 15 business days following the day the complaint was received by Jeton. In exceptional circumstances, this can be extended to 35 business days. Where the complaint does not relate to provision of electronic money or payment services (as per parts 6 and 7 of the PSRs 2017), a Financial Response must be issued within 8 weeks from the date the complaint was received.

All Personal Data processed during the complaint handling processes must be handled in accordance with Jeton's Data Protection Policy and any related procedure(s).

If the complaint handler is satisfied that they possess all the information required to competently, diligently and impartially investigate the complaint, then they are to provide an introductory communication to the customer identifying themselves as the owner of the concern within Jeton and setting out a timetable for resolution.

The complaint will be formally acknowledged within 48 hours and will be escalated to the appropriate.

Stage 2: Complaint resolution

Every complaint must be handled in an appropriate manner and within a reasonable time frame to best serve the interest of the complainant.

Jeton 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; and

Factors that may be relevant in the assessment:

- all the evidence available and the circumstances of the complaint;
- similarities with other complaints received by the respondent;
- relevant guidance published by regulatory authorities; and

- appropriate decisions in similar cases issued by regulatory authorities.

Once the complaint has been assessed and investigated, Jeton will communicate their decision clearly and promptly, explaining why the complaint has been upheld or rejected and advising any redress award.

Jeton will then comply promptly with any offer of remedial action or redress accepted by the complainant.

The basic objective of redress is to put the customer, so far as possible, into the position they would have been in if the reason for the complaint had not occurred. Each case should be assessed individually and fairly and we aim to be consistent with redress in accordance with the Financial Ombudsman Services guidance. Further information on understanding compensation can be found here: <https://cmc.financial-ombudsman.org.uk/cmcs/resolving-complaint/understanding-compensation>

Complaints redress is captured in the complaints log alongside all details of the complaint. Complaints redress monitoring will be tested using the Financial House compliance monitoring plan

Summary Resolution

If a complaint is resolved by close of business on the third working day from the date of receiving it, a Final Response does not have to be sent. Instead, a Summary Resolution must be sent to the complainant promptly.

A complaint is resolved when the complainant indicates the response from Jeton is an acceptable resolution to the complaint. Neither of these communications has to be in writing, which means simple and straightforward complaints can be resolved more informally over the telephone. But a Summary Resolution must be sent to the complainant that:

- summarises the complaint
- states that we think the complaint has now been resolved
- tells the customer they have the right to complain to the FOS within six months of the final response if they are not satisfied with the outcome
- indicates that Jeton is not happy to waive the relevant time limits
- provides the address of the FOS, its website and explains that more information is available on its website.

A Summary Resolution template covering these points can be found at Annex 1.

Final Response

Where a complaint cannot be resolved at the end of the third business day, Jeton must issue a Final Response, within:

- 15 business days from date of receipt, where the complaint relates to the provision of e-money or payment services (Parts 6 and 7 PSRs 2017)
 - In exceptional situations, where the response cannot be given within this timeframe for reasons beyond its control, Jeton must send a holding reply explaining the reasons for the delay in resolving the complaint and specifying a deadline for future response (which will not exceed 35 business days).
- 8 weeks for all other complaints (those that do not relate to the e-money holders or payment service users right and obligations under Parts 6 and 7 of the PSRs)

All Final Responses must be sent in writing to the complainant, and should:

- summarise the complaint
- be open in acknowledging any mistakes made
- give details of whether the complaint is accepted and where applicable, offer redress or remedial action to settle the matter
- if the complaint is not accepted, state this and give reasons why it is rejected
- tell the customer they have the right to complain to the FOS within six months of the final response if they are not satisfied with the outcome
- indicate that Jeton is not happy to waive the relevant time limits
- provide the address of the FOS, a link to its website and a copy of its standard explanatory leaflet.

Remedial Action and Redress

Where a customer has been disadvantaged by a product or service failure, it is Jeton policy to take whatever action is required to restore the customer to the position they would have been in, had the failure not occurred.

Where the customer is financially disadvantaged, Jeton must reimburse any losses that the customer has directly incurred. Jeton should aim to put the customer back in the same position they should be in, had the error or failure not been made.

Where the customer has been unreasonably inconvenienced by Jeton's failure, then it is appropriate that the firm makes recompense for the burden it has caused in the form of an ex-gratia payment. In these circumstances, each Jeton division has discretion to determine the level of redress paid to the customer, considering the level of inconvenience caused and local custom and practice.