



# JDM SERVICES COMPLAINTS HANDLING POLICY

POLICY OWNER

HEAD OF SALES

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## 1.0 Core Principles

JDMS Service Limited (“JDMS”) is committed to comply with its obligations under all relevant regulations including the Consumer Credit Act 1995, Consumer Protection Code 2012 (CPC25) and Central Bank (Supervision and Enforcement) Act 2013 (Section 48) (Lending to Small and Medium-Sized Enterprises) Regulations 2015.

This policy should be read in conjunction with to JDMS’s Customer Communication policy and the Credit Control Policy

## 2.0 Scope

### 2.1 In scope

This procedure covers all relevant interactions in respect of the JDMS businesses.

### 2.2 Audience

The audience for this policy is all existing JDMS employees and, also, all future employees. JDMS Employees are required to read and attest awareness of this Policy when onboarded, on an annual basis or when the Policy has been updated (if sooner)

## 3.0 Risk Appetite

This Policy has been produced in line with JDMS’s Risk Appetite, as defined in the Risk Appetite Statement.

## 4.0 Strategy

JDMS uses the definition of complaints as set out in Consumer Protection Code 2012 as follows:

A “complaint” refers to an expression of grievance or dissatisfaction by a customer, either orally or in writing, in connection with:

- (a) the provision or the offer of the provision of a product or service to a customer by JDMS; or
- (b) the failure or refusal of JDMS to provide a product or service to a customer

Complaints may be raised by a customer in writing, by phone, in a face-to-face meeting or by a third party acting on behalf of a customer (e.g. Intermediary, legal representative or regulatory body).

It is JDMS’s policy to provide the highest possible level of service to our customers, subject to sensible and reasonable commercial constraints. However, from time to time some customers may be dissatisfied with some aspect(s) of the service JDMS provides and JDMS acknowledges their right to have any expression of dissatisfaction dealt with courteously, professionally and in a timely manner.

JDMS’s objectives in dealing with customer complaints are:

- To address reported customer dissatisfaction quickly, effectively and fairly;
- To ensure a fair and equitable resolution of the complaint;
- To keep the customer updated on the progress of their complaint;
- To maintain customer confidence and respect;

- Where appropriate, to update our procedures and introduce corrective actions to avoid re-occurrence of any problems identified;
- To comply with our regulatory obligations in dealing with expressions of dissatisfaction from customers; and
- To endeavour to achieve a situation where a customer is satisfied that JDMS has addressed the complaint. However, if a customer is not satisfied with the proposed resolution, to ensure that, as applicable the customer is notified of the right to refer the matter to the appropriate appeals process.

## 5.0 Overview of Complaints Handling Process

JDMS strives consistently to provide all customers and potential customers with the highest quality of products and services. When a customer takes the time and effort to lodge a complaint, it is our policy to investigate the situation, communicate with the customer and to address the issue promptly.

This policy requires responsible employees to:

- a) Work constructively with customers (or the customer's authorised representatives) who have contacted JDMS regarding a complaint;
- b) Evaluate each complaint to determine whether it alleges specific regulatory and/or legal violations;
- c) Investigate the circumstances in which the complaint arose;
- d) Determine the merits of the complaint;
- e) Ensure a professional level of response that underlines JDMS's core value of Respect;

The sales team are responsible for handling customer complaints in the first instance. For more serious complaints, and/or unresolved customer complaints, the matter may be referred to the Risk & Compliance Function (and seek onward legal advice if deemed appropriate).

**Step 1:** Any customer complaint raised will be recorded and documented by the Sales team on receipt of the complaint.

**Step 2:** The complaint will be acknowledged within 5 working days, either in writing or in another durable medium, from the date of receipt of the complaint, unless the complaint is resolved in that timeframe.

**Step 3:** The above acknowledgement will also include the name of the person(s) appointed to handle the complaint. This person will act as the point of contact in relation to the complaint until the complaint is resolved or cannot be processed further.

**Step 4:** If the complaint has not been resolved following immediate contact as per Step 2 above, the complaint will then be actively investigated and a comprehensive response or update will be sent to the customer within 20 working days of receipt of the complaint.

**Step 5:** JDMS will attempt to resolve the complaint within 40 working days of it being made. Where 40 working days have elapsed the complaint remains unresolved, JDMS will inform the complainant

of the anticipated timeframe within which JDMS hopes to resolve the complaint. At this point, JDMS will also inform customers who are “consumers” of their right to refer the matter to the Financial Services and Pensions Ombudsman (“FSPO”) and will provide the relevant contact details.

For the purpose of FSPO referral, “consumer” means any of the following:

- (a) a person or group of persons, but not an incorporated body with an annual turnover in excess of €5 million in the previous financial year (for the avoidance of doubt a group of persons includes partnerships and other unincorporated bodies such as clubs, charities and trusts, not consisting entirely of bodies corporate); or
- (b) incorporated bodies having an annual turnover of €5 million or less in the previous financial year (provided that such body shall not be a member of a group of companies having a combined turnover greater than said €5 million);  
and includes where appropriate a potential consumer (within the meaning above)

**Step 6:** JDMS will inform the customer within 5 working days of the completion of the investigation of its outcome and, where applicable, the following

- the terms of any offer or settlement being made;
- the right of consumers to refer the matter to the FSPO; and
- the contact details of the FSPO as applicable.

**Step 7:** In the event that a customer who is a consumer subsequently refers the complaint to the FSPO and the FSPO advises the complainant to direct the complaint in writing to a nominated member of senior management of JDMS, the member of senior management nominated by JDMS will try to resolve the issue within 25 working days. If the complaint remains unresolved after 25 working days, a Final Response Letter will be issued to the complainant. This letter:

- includes a detailed account of the dispute at hand;
- addresses all issues outlined in complainant’s Complaint Form;
- quotes the applicable lease/consumer hire contract terms, HP/terms of business etc.;
- gives details of any redress offered to the complainant by JDMS;
- states that it is the Final Response of JDMS for the purpose of referring the matter to the FSPO; and
- advises the complainant that he/she has 15 working days from the date of said Final Response to refer the matter to the FSPO for investigation.

It is JDMS policy that complaints made directly to senior management should be escalated to the Head of Retail Sales, who will inform the Risk & Compliance Function then acknowledge and seek to resolve such complaints in a timely manner, following the steps outlined above. In relation to complaints made to the Central Bank of Ireland, FSPO or any other equivalent regulatory bodies, the Head of Retail Sales will work with the Risk & Compliance Function in directing the investigation and resolution of all customer complaints received from such regulatory bodies. For complaints made to FSPO any response must be approved by the Risk & Compliance Function. Such complaints at a minimum in accordance with the steps outlined above.

Where a complaint is being investigated by the FSPO, JDMS will have 20 working days to answer a series of questions posed and to submit any material and make any submissions which JDMS sees as being desirable to put before the Ombudsman or which the Ombudsman requires to see, in order to enable the Ombudsman to investigate and adjudicate on the complaint. Once the complainant provides comments to the FSPO on JDMS’s response, JDMS will have 5 working days to submit any further observations to the FSPO. In the event that a regulatory body imposes stricter timeframes for the resolution of an issue or complaint, JDMS will endeavour to adhere to those timelines.

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Any legal correspondence from solicitors/others inviting response or advising of possible/pending legal action are referred to the Head of Retail Sales and Risk & Compliance Function, who may seek legal advice in respect of same. As these complaints tend to be directed at litigation, the timelines for response and resolution may differ from those outlined above.

## 6.0 Complaints Log and Records

JDMS's Head of Retail Sales will maintain a complaints log which will include details of the following:

- a) details of each complaint
- b) the date the complaint was received
- c) a summary of JDMS's response(s) including dates
- d) details of any other relevant correspondence or records
- e) the action taken to resolve each complaint
- f) the date the complaint was resolved and
- g) where relevant, the current status of the complaint which has been referred to the FSPO

In addition to the above, JDMS will ensure that up to date and comprehensive records for each complaint are maintained.

## 7.0 Quality Review and Analysis of Systemic Issues

As part of its compliance monitoring programme, the Head of Compliance will undertake quality reviews in respect of complaints handling on a periodic basis.

The Head of Retail Sales will also undertake analysis of the patterns of complaints received on a regular basis including investigating whether complaints indicate an isolated issue or whether any systemic issues are identified.

Such analysis will be presented to the Risk & Compliance Function as part of any regulatory reports, or as soon as possible in the event that a potential serious issue is identified which requires immediate attention (e.g. possible indications of fraud). It can also be used to highlight areas for improvement in JDMS's risk management framework and to facilitate product design.

## 8.0 Communication & Policy Review

The Complaints Handling Policy will be made available to all staff. In addition, the Head of Retail Sales will be responsible for ensuring training on complaints is undertaken by staff on joining JDMS and periodically thereafter.

This Policy will be reviewed on an annual basis and will also be updated should any changes in regulatory requirements take place that impact the Policy.

## 9.0 Definitions

*Complaint*: refers to an expression of grievance or dissatisfaction by a customer, either orally or in writing, in connection with 1. the provision or the offer of the provision of a product or service to a customer by JDMS; or 2. the failure or refusal of JDMS to provide a product or service to a customer

*Consumer*: means any of the following:

- (a) a person or group of persons, but not an incorporated body with an annual turnover in excess of €5 million in the previous financial year (for the avoidance of doubt a group of persons includes partnerships and other unincorporated bodies such as clubs, charities and trusts, not consisting entirely of bodies corporate); or
- (b) incorporated bodies having an annual turnover of €5 million or less in the previous financial year (provided that such body shall not be a member of a group of companies having a combined turnover greater than said €5 million);  
and includes where appropriate a potential consumer (within the meaning above)

FSPO: Financial Services and Pensions Ombudsman

## 10.0 Roles and Responsibilities

### 10.1 Board of Directors

The JDMS Board have ultimate responsibility for setting the risk appetite and managing risk within the organisation.

### 10.2 Policy Approval

This Policy shall be approved by the Board and will receive a full review annually. All appropriate legislation will be checked annually and the policy may be amended if required within this period to ensure ongoing relevance and effectiveness.

### 10.3 Head of Retail Sales

The JDMS Head of Retail Sales is responsible for providing oversight and ensuring effective implementation of the complaints handling process, acting as chief repository for all customer complaints received by JDMS and ensuring compliance with the policy in addition to providing regular reporting.

The JDMS Head of Retail Sales is responsible for ensuring that the complaints handling process works in a fair and proper manner, providing day to day oversight and advice on the implementation of this policy, reviewing and resolving serious complaints escalated and identifying training needs where appropriate.

### 10.4 Risk & Compliance Function

JDMS Risk & Compliance Function refers to the firms Head of Compliance and Chief Risk Officer who act as the 2<sup>nd</sup> line of defence. The Risk & Compliance Function is responsible for monitoring the effectiveness of the sales functions application of this policy and identifying types of exposures that may exist.

## 11.0 Version Management

Version	Date	Author/ Changed by	Summary of Change
0.1	24/03/2026	Steve Rayner	Customer Version Created

Commented [SR2]: Steve to update consumer definition

