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| Company Name | RAL ENERGY LIMITED |
| Company Limited Registered Number | **13917755** |
| Company Address - Unit 24 Gerard park college street WA101FZ | |
| Date | 2026 |

RAL Energy Limited is authorised and regulated by the Financial Conduct Authority FRN 1002762.

We act as a credit broker not a lender and offer finance from a panel of lenders.

This document provides guidelines for the resolution and the treatment of complaints made by our customers.

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## 1. COMPLAINTS CONTACT DETAILS

| | |
|---|---|
| Name | Andrew Gough |
| Telephone Number | 0151 832 7133 |
| Email Address | contact@ralenergy.com |

## 2. POLICY STATEMENT

If our customer needs to file a complaint or express dissatisfaction, we will make it easy for them to do so. This procedure covers how we will action a complaint be it about the product or funding option.

The company will ensure all staff are trained well to identify and handle complaints, and also to understand the importance of our complaint management system.

We will receive the complaint and consider them as an opportunity to learn, adapt, improve, and provide a better service.

A quick resolution of a complaint, in a way that respects and values the person's feedback, will help recover the persons confidence in our products and services. It can also help prevent further escalation of the complaint. A responsive, efficient, and fair complaint management procedure will help us achieve this.

The purpose of this policy is to ensure that complaints are dealt with consistently and properly and that all comments and complaints are taken seriously. This organisation expects staff at all levels to be committed to fair, effective and efficient complaint handling.

## 3. PRINCIPLES

We will ensure that our customers have a right to:

- Be treated fairly and sensitively
- Be kept informed about what is happening with their complaint

- And be advised of the service standards they should expect • The timescale for acknowledging and responding to a complaint
- And any right of appeal.

All staff will:

- Be sensitive to the needs of customers • Treat complaints as confidential, where possible
- Be accessible and clearly identified.

Our policy will:

- Be open, easily accessible, and widely promoted to all our customers and those who represent them
- Be easy to understand and use by all customers and employees
- Set out how to complain and how a complaint will be handled.

## 4. PURPOSE

This policy is intended to ensure that we handle complaints fairly, efficiently, and effectively and as a FCA Authorised firm, we will comply with the regulations and refer to DISP 1.3 Complaints handling rules. https://www.handbook.fca.org.uk/handbook/DISP/1/3.html

This complaints policy and procedures will be implemented effectively, and ensure complainants feel confident that their complaints, worries, or concerns are listened to and acted upon promptly and equitably.

Our complaints management system aims to:

- Record the complaint on the customers individual file and on the complaints register
- Allow us to respond to a complaint in a timely manner
- Increase the confidence in our administrative procedures
- Help us improve the quality of our products and services, staff training and complaint handling
- Record remedial actions taken and any redress that is paid to a customer or both may be appropriate, and the reasons for us coming to those decisions.

## 5. REMEDIAL ACTION

Remedial action is intended to correct something that is wrong or to improve a bad situation. This may include the replacement of faulty products, incorrectly fitted products or a change of product that may be suitable to the customers home, and that we have supplied according to the original sales customer contract, or it could be about the finance product, in the way it was presented, the credit agreement or the lenders terms. See Sections 56 & 75 of the Consumer Credit Act.

We endeavour to make our remedial actions a ‘one off’ event driven corrective measures. Each product remedial action will be different due to the nature of the sale contract provided due to a bespoke

nature of the installation to their home. However, we document all our remedial action plans on their customer file and our management system. This system provides the firm with management information to identify regular occurrences of complaints by product, installations, finance, or staff. We aim to provide a consistent approach to all complaints. All staff will follow the examples set out in the compensation guidelines to assist in deciding the appropriate level of payment to ensure all customers are treated fairly, and any compensation payments are consistently applied to all our customers. This may involve one or more of the following:

- Apology: A financial award is not always appropriate. Often, a simple, heartfelt apology will be sufficient and may go a lot further than offering a monetary payment.
- Redress: A payment to restore the customer to the financial position they would be in if things had not gone wrong.
- Distress: The emotional impact caused to the customer by something going wrong. The Financial Ombudsman (FOS) defines distress as including upset, embarrassment, anxiety, disappointment, loss of expectation and stress. They expect a firm to consider how much their action has affected the complainant and respond accordingly.
- Inconvenience: The time it has taken the customer trying to right something that has gone wrong.

All staff must be aware of their individual financial mandate as to whether they have the authority to make the appropriate level of payment necessary or should refer it to Andrew for authorisation. We will comply promptly with any offer of remedial action or redress accepted by the complainant.

Considering the nature, scale, and complexity we will ensure that lessons learned as a result of determinations by the Ombudsman and are effectively applied in future complaint handling.

We will

- Relay a determination by the FINANCIAL OMBUDSMAN SERVICE to the individuals who handled the complaint and use it in their training and development;
- Analyse any patterns in determinations received by the FINANCIAL OMBUDSMAN SERVICE and use this in training and development; and
- Analyse guidance produced by the FCA, other relevant regulators and the FINANCIAL OMBUDSMAN SERVICE and communicating it to the individuals dealing with complaint.

## 6. SECTIONS 56 & 75 OF THE CONSUMER CREDIT ACT

For customers using the funding option they have extra protection through the Consumer Credit Act.

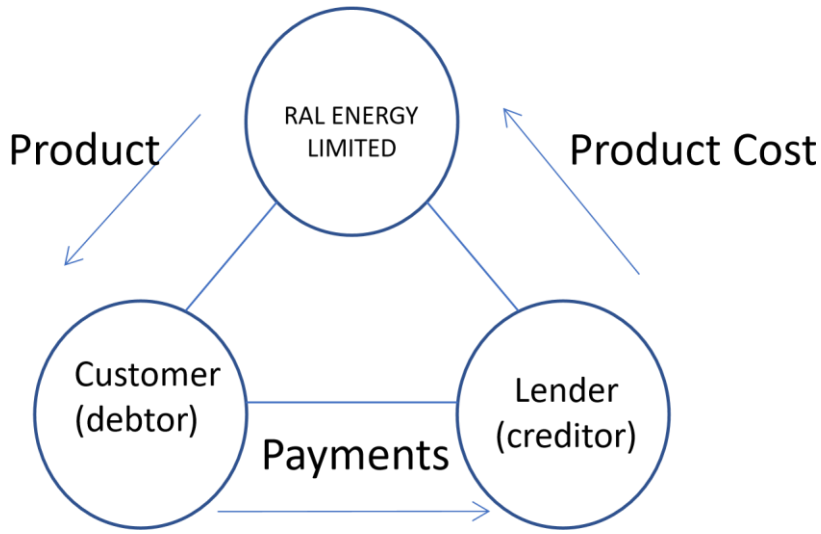
Under section 56 of the Consumer Credit Act, customers can make a claim against us and/or the lender if they believe that the finance was mis-sold or misrepresented. We will provide clear, fair, and not misleading information regarding the finance products to our customers, and we understand failure to do so could result in a section 56 claim.

Under section 75, customers can make a claim to the lender if they are not satisfied with the products and services provided on finance if the cash price of the goods or service was more than £100 but less than £30,000. If the cash price was more than £30,000 and the loan or credit amount is less than

£60,260, customers can only make a claim against the lender if the retailer is not able to settle the customer's claim.

We are aware that any complaints made under sections 56 and 75 are reportable under the FCA's regime but in the majority of cases, these complaints are raised directly to the lender therefore it is their responsibility to report these as part of their REGDATA return. If a complaint of this nature is raised directly to us, then we will include it in our REGDATA return.
Section 75 of the Consumer Credit Act 1974 is there for customers that have purchased using funding brokered through us. If the debtor (the customer) under a debtor-creditor-supplier agreement falling within section 12(b) or (c) has, in relation to a transaction financed by the agreement, any claim against the supplier (us) in respect of a misrepresentation or breach of contract, shall have a like claim against the creditor (the lender), who, with the supplier (us), shall accordingly be jointly and severally liable to the debtor (the customer). Subject to any agreement between them, the creditor (the lender) shall be entitled to be indemnified by the supplier for loss suffered by the creditor (the customer) in satisfying their liability, including costs reasonably incurred by the debtor (the customer) in defending proceedings.

This diagram represents the Section 75 Consumer Credit Protection flow of the relationship when our customers make a purchase with us using our funding brokerage.




S75 – Consumer Credit Protection

## 7. WHAT IS A COMPLAINT?

A complaint is an expression of dissatisfaction about our products, services, our staff, our actions, or lack of actions taken regarding operations, facilities, advertising and marketing information and

anybody or company acting on our behalf. This policy ensures that all complaints can be made by any reasonable means; and we recognise complaints as requiring resolution.

A formal complaint means a complaint that has not been successfully resolved through our complaint management systems outlined in this policy. The complainant has chosen to formalise the complaint by completing our complaint form, or by writing to us.

An informal complaint means a complaint that has been received by us, by phone, email, postal mail or in person, which has not been submitted on our complaint form.

Where we identify recurring problems, we will in accordance with Principle 6 Customers' interests consider we will:

- Ascertain the scope and severity of the consumer detriment that might have arisen; and
- Consider whether it is fair and reasonable undertake proactively a redress or remediation exercise, which may include contacting customers who have not complained.

## 8. COMPLAINT MANAGEMENT SYSTEM

Our customers can make their complaint to us without incurring any fees. We do not use premium rate telephone numbers and offer all our customers our postal address and email address, which is managed daily to ensure they can access us at any point during their journey with us.

All complaints will be recorded on both the client file and the complaint management system. This is a Microsoft system we have designed in house to enable us to track the complaint and use the management information for future developments, improvements as well as providing accurate information for external bodies, regulators, and our lender partners.

We will confirm the complaint details to the customer in writing (this maybe email / text message or letter depending on the customer's choice) within 3 working days of receipt.

We will continue to keep the customer informed on the progress of the complaint weekly, in writing, in their preferred method of contact.

If the complaint involves a third party, such as a manufacturing fault, we will hold the complaint as we see the customer as our customer and work with the manufacture to resolve the fault. We will inform the customer of the third party promptly; including the third-party contact details where applicable.

## 9. ORAL COMPLAINTS

Staff who receive a verbal complaint should try to resolve this immediately if possible.

Information is to be recorded on the customers file, and acknowledgement sent to the customer in writing clarifying the complaint and action to be taken including estimated time frames. This will be actioned within three working days of the complaint being received. It is important that we check with

the customer that they are able to read our correspondence, some oral complaints may be received in this form as the customer has a vulnerability when it comes to communication.

The complaint is to be discussed with the company complaints manager Andrew.

Andrew will be a named person on the FCA register and who deals with complaint through the process. When staff or management receive an oral complaint, both should listen sincerely to the issues raised by the complainant. Any contact with a complainant must be polite, courteous, and sympathetic. At all times, staff and management must remain calm and respectful.

An action plan of remedial work to resolve the complaint will be produced in writing. This will be discussed with the complainant. The action plan will include an estimated timeframe, which we aim to have within 28 days of the complaint. We may have to arrange a visit to the customer's home, which will be on the plan, agreed with the customer in writing and within a 14-day period or receipt of the complaint. We understand that the customer may have some feedback on the action plan, which we will take into consideration and if changes are required that the complaints person is unable to authorise individually then the proposed action plan will be taken back to the senior managers to discuss. This procedure will continue until there is an agreed action plan to resolving the complaint.

We will send the action plan and the complaint's procedure to the customer.

## 10. WRITTEN COMPLAINTS

When a complaint is received in writing, it must be forwarded to the named complaints contact, who must enter the details into the complaints log and then send a acknowledge receipt within 3 working days.

If the complaint is not made by our customer, but is made on their behalf, the customers consent, preferably in writing, must be obtained in advance from the customer.

An action plan of remedial work to resolve the complaint will be produced in writing. This will be discussed with the complainant. The action plan will include an estimated timeframe, which we aim to have within 28 days of the complaint. We may have to arrange a visit to the customer's home, which will be on the plan, agreed with the customer in writing and within a 14-day period or receipt of the complaint. We understand that the customer may have some feedback on the action plan, which we will take into consideration and if changes are required that the complaints person is unable to authorise individually then the proposed action plan will be taken back to the senior managers to discuss. This procedure will continue until there is an agreed action plan to resolving the complaint.

## 11. MANAGEMENT INFORMATION

Complaints are an important management tool which allows us to learn about the products and services we provide.

They are a useful source of information about how the customers see our services and how we are serving our customers. Andrew will collect this information and use it with the other senior managers to progress the business.

To assist with our learning the following data should be collected for every complaint received:

- Each complaint will be individually numbered, so we can track total number of complaints received
- The name and address of complainant
- Contact details for the complainant
- The name and role of the person dealing with the complaint
- Contact details for others involved in the complaint i.e., sales person / installer
- The dates on which the complaint was received and on which it was responded to
- The nature of the complaint
- Payment structure for the complainant
- The outcome of the complaint
- How the complaint was received
- Remedial/Redress action carried out in response to the complaint including timeframes
- Redress paid to the customer
- Lessons learnt from the complaint.

Our weekly senior managers meeting will include reviewing all customer complaint information.

The following methods will be used to report complaints information:

- A weekly report to the management
- A monthly overview report compiled by the management team
- A 6-monthly report to show the data, causes and actions taken to avoid these complaints in the future
- An annual report to the Financial Conduct Authority (FCA) via RegData.

We use some core principles that help us to provide effective management data, effective root cause analysis. Not only will these help the analysis quality, but these will also help the analyst gain trust and buy-in from staff and customers:

- Focus on correcting and remedying root causes rather than just symptoms
- Do not ignore the importance of treating symptoms for short term relief
- Realise there can be, and often are, multiple root cause
- Focus on HOW and WHY something happened, not WHO was responsible
- Be methodical and find concrete cause-effect evidence to back up root cause claims
- Provide enough information to inform a corrective course of action
- Analysing guidance produced by agencies such as the FCA, regulators and FINANCIAL OMBUDSMAN SERVICE, and communicating it to the individuals dealing with complaints.
- Consider how a root cause can be prevented (or replicated) in the future.

The above principles illustrate when we analyse deep issues and causes, it is important to take a comprehensive and holistic approach. In addition to discovering the root cause, we should strive to provide context and information that will result in an action or a decision. Remember: good analysis is actionable analysis.

## 12. COMPLAINTS REPORTING

We understand as an authorised and regulated firm of the FCA we will have to report to the FCA annually. We will need to report on all complaints received in relation to credit related regulated activities.

All customer complaints are recorded on our complaints log, including how the customer paid for the goods. We can then easily recognise those customers who must be provided with information about the FCA and FINANCIAL OMBUDSMAN SERVICE.

We are aware that any complaints made under sections 56 and 75 are reportable under the FCA's regime but in the majority of cases, these complaints are raised directly to the lender therefore it is their responsibility to report these as part of their REGDATA return. If a complaint of this nature is raised directly to us, then we will include it in our REGDATA return.

## 13. DATA PROTECTION

RAL Energy Limited will hold personal data, which includes data the complainant provides us and information that other people provide. This data will be secure and only use it to help process the complaint. The identity of the person making the complaint will only be made known to those who need to consider the complaint and will not be revealed to any other person or be made public by us. However, it may not be possible to preserve confidentiality in some circumstances, for example, where relevant legislation applies, or allegations are made which involve the conduct of any third parties, for example delivery of the goods from a manufacturer. Under the Freedom of Information Act 2000, customers have a right to obtain a copy of their personal data. However, there are exceptions to this right. We normally destroy our complaint files six years after the complaint has been closed. We will maintain records for finance customers for a maximum of ten years.

## 14. OUR PROCEDURE

Customers can make a complaint free of charge by any reasonable means (letter, email, telephone call, personal visit). When we receive a complaint from a customer, we will immediately start to collate the information we need to complete the customer's record and our complaint management system. Our first step is to assess whether the complaint points raised relate to us or a 3rd party, such as the lender who provides the loan to the customer and whether the complaint is an eligible complaint from an eligible complainant.

After the initial information has been collected, the Complaints Manager will assign the complaint to an appropriate member of staff. The designated person will not have any conflicts of interest in managing and investigating the complaint. All complaints will be investigated competently, diligently, and impartially so we can be sure that we are able to treat our customers fairly.

Following the steps detailed below and on our 'process flow diagram' the complaint will be thoroughly investigated, and the customer will be kept appraised by the agreed communication method on a regular basis. We will: -

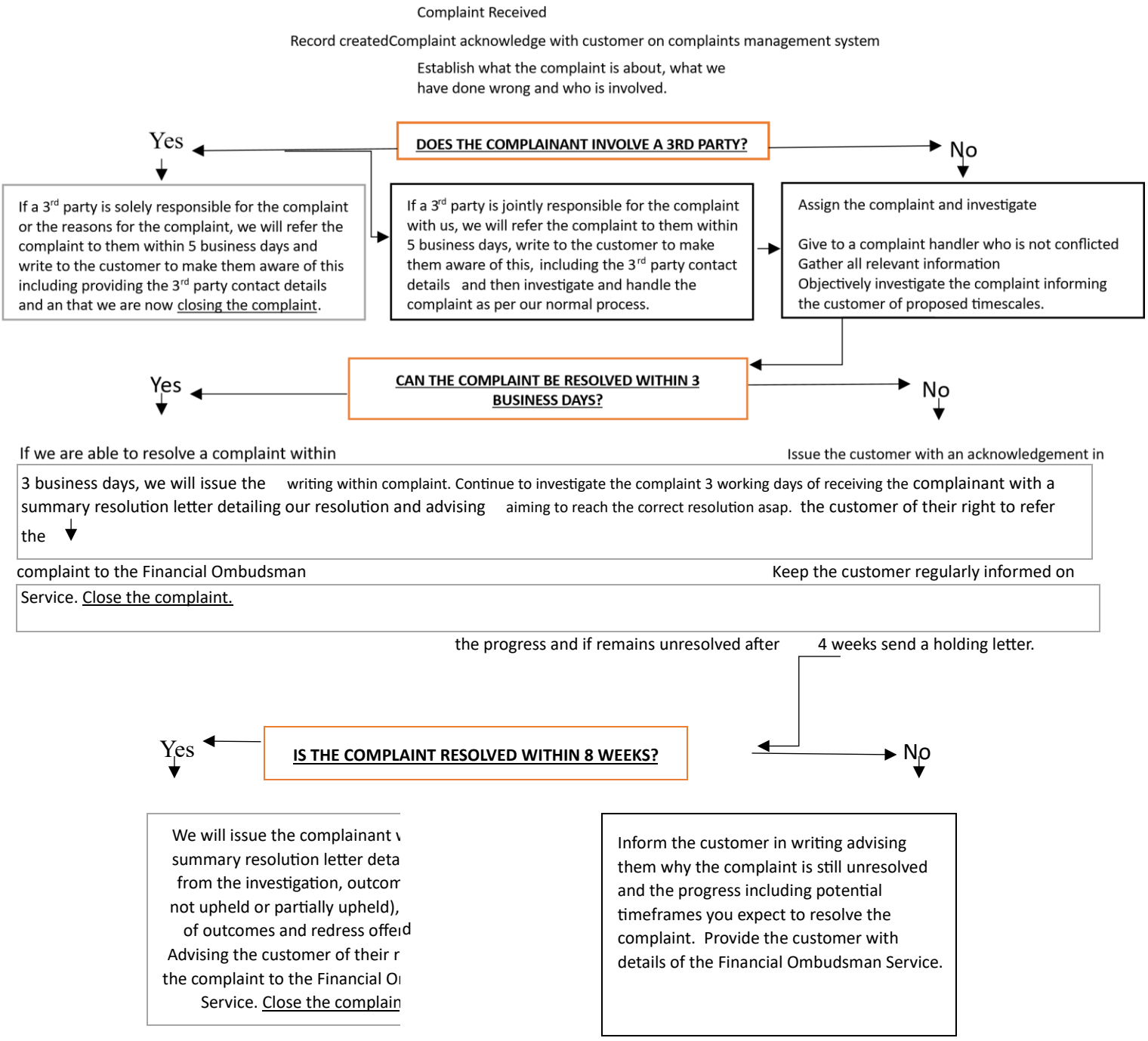
- Record details on the customer's file
- Record details on the complaints management system
- We will not delay the complaint by asking for it in writing to us about your complaint
- We will acknowledge the complaint in writing within three working days, detailing our understanding of the complaint, our suggestion solution, and timeframes. Depending on the complaint this could take up to 28 days or longer
- We will make contact to seek clarification on any points where necessary
- Disclose to the customer any third parties that may be involved in resolving the complaint
- If the complaint is in relation to regulated activity, we will ensure the customer is aware of their rights under section Sections 56 & 75 of the Consumer Credit Act
- Fully investigate the complaint
- Keep the customer informed of our progress
- Keep the customer informed on time frames
- Discuss with you our findings and proposed response
- Provide clear deadlines to respond
- Provide the customer with a final response
- Ensure the customer is notified about the FINANCIAL OMBUDSMAN SERVICE
- Capture information for regulative reporting and internal training and development.

The customer will receive contact from us advising on progress if we cannot respond immediately. We will let the customer have our final response as soon as possible and not later than eight weeks.

Customers may express dissatisfaction to us about our products, services, staff, or advertising. We will need to establish if the complaint relates to the information given, the firm or the service and installation. If unclear, this must not delay investigation and we will proceed with our own

investigation. This will be reviewed and continued to be investigated with written explanation and any supporting information. This may include photos, checklists, or remedial satisfaction notes.

## Complaint Process Flow Diagram




All complaints will be recorded so we are able to identify trends and make the necessary business changes to improve the services to our customers and prevent repeat occurrences.

## 15. INVESTIGATION

Andrew will establish the nature and scope of the complaint having due regards to the FCA direction:

- Deal with complaints promptly and fairly
- Give complainants clear replies and, where appropriate, fair redress
- If a third party is involved, such as a manufacture of the products we sell to our customers, we will liaise with them directly. Our customer is always seen as our customer. If we have to share any data with the manufacture i.e., the customer's name and address in order to contact a site visit, we will obtain authorisation from the customer beforehand
- We understand that we have 8 weeks to provide a resolution, however we aim to take up to 28 working days, in this time we will provide weekly updates, so the customer is aware we are working to resolve the complaint.

As part of our investigation, as a team we will: -

- Document and report the complaint
- Determine if we need to attend the customers property where the goods have been installed
- Arrange an appointment to survey the property
- Interview staff/installers
- Gather evidence including photographs
- Involve third parties if required
- Review and evaluate the information collated
- Take any necessary action • Document conclusions
- Follow-up.

## 16. COMPLAINTS FORWARDING

The FCA has specific rules about informing our customers if we believe that their complaint may be solely or jointly the responsibility of another firm, person, a body, or regulator. This will be recorded on the customer file and provide written communication. We will ask the customer their preferred method of receiving written correspondence i.e., email or post.

This will be actioned as priority including an explanation for our decision in a clear and concise way, in order for the customer to best understand the reason for forwarding on their complaint.

A respondent (the firm) that has reasonable grounds to be satisfied that another respondent may be solely or jointly responsible for the matter alleged in a complaint may forward the complaint, or the relevant part of it, in writing to that other respondent, also:

- Does so promptly

- Informs the complainant (customer) promptly in a final response of why the complaint has been forwarded by it to the other respondent, and of the other respondent's contact details; and
- Where jointly responsible for the fault alleged in the complaint, it complies with its own obligations under this chapter in respect of that part of the complaint it has not forwarded.

As a firm we may receive a Complaint via Complaint forwarding. On receiving a forwarded complaint, the standard time limits will apply from the date on which the respondent receives the forwarded complaint.

## 17. ELIGIBLE COMPLAINANTS

We will treat all complainants the same, however, eligible complainants, customers that have purchased goods and services using a lenders finance, are legally defined and have additional rights in law that we must acknowledge and adhere to.

THE FCA RULES APPLY TO COMPLAINTS:

- Made by, or on behalf of an eligible complainant
- Relating to regulated activity
- Involving an allegation that the complainant has suffered, or may suffer, financial loss, material distress or material inconvenience.

## 18. FINAL RESPONSE

This will set out clearly our decision and the reasons for it. If any compensation is offered a clear method of calculation will be shown. We must do this within 8-weeks of receipt of your complaint.

We will let you know if we:

- Accept the complaint and, where appropriate, offers redress or remedial action; or
- Offer redress or remedial or both if appropriate, what remedial action we are taking for example replacing a product, moving products and action without accepting the complaint; or
- Reject the complaint and gives reasons for doing so
- Explain that you must refer the matter to the ombudsman within six months of the date of the final response letter or the right to use this service is lost
- We will indicate to you whether or not we consent to waive the relevant time limits.

If in the event of not concluding your complaint we will explain why if we are not in a position to make a final response and indicate when we expect to be able to provide one to you and include the following:

- Informs the complainant that they may now refer the complaint to the Financial Ombudsman Service;
- Indicate whether or not you the respondent consents to waive the relevant time limits in DISP 2.8.2 R or DISP 2.8.7 R for example was the complaint referred to the Financial Ombudsman Service in time, if it becomes apparent that the complaint has been made or is referred outside those time limits;
- Encloses a copy of the Financial Ombudsman Service standard explanatory leaflet; and

- Provides the website address of the Financial Ombudsman Service.

## 19. COMPLAINTS SETTLED WITHIN 3 WORKING DAYS

Complaints that can be settled to the customer's satisfaction within three working days can be recorded and communicated differently.

Where we consider a complaint to be resolved to the customer's satisfaction under this section, the firm will promptly send a 'Summary Resolution Communication', being a written communication from us which:

- Refers to the fact that the customer has made a complaint and informs them that they now consider the complaint to have been resolved to the customers satisfaction
- The firm will tell the customer that if they subsequently decide that they are dissatisfied with the resolution of the complaint they may be able to refer the complaint back to the firm for further consideration or alternatively refer the complaint to the FINANCIAL OMBUDSMAN SERVICE
- Provide the website address of the FINANCIAL OMBUDSMAN SERVICE
- Refer to the availability of further information on the website of the FINANCIAL OMBUDSMAN SERVICE.

In addition to sending a Summary Resolution Communication, the firm may also use other methods to communicate the information where:

- We consider that doing so may better meet the customer's needs; or
- They have already been using another method to communicate about the complaint. This may include recorded calls, emails, or text messages
- All communication will be recorded on to the customer's file.

## 20. CLOSING A COMPLAINT

We will consider a complaint closed when we have made our final response to the customer.

This does not prevent a customer from exercising any rights they may have to refer the matter to the FINANCIAL OMBUDSMAN SERVICE.

Our final response must include:

- If we accept the complaint and, where appropriate, offers redress or remedial action
- Offers redress or remedial action without accepting the complaint
- Reject the complaint and we will give our reasons for doing so
- Provide our customers with a copy of the FINANCIAL OMBUDSMAN SERVICE standard explanatory leaflet and the contact details including full postal address, phone number, email, and a link to their online complaint form.

If the customer remains dissatisfied, they will be informed that they may refer their complaint to FINANCIAL OMBUDSMAN SERVICE.

## 21. FINANCIAL OMBUDSMAN SERVICES

We will co-operate fully with the Ombudsman in resolving any complaints made against us and agree to be bound by any awards made by the Ombudsman. The firm undertakes to pay promptly any fees levied by the Ombudsman.

The customer will be informed that they have the right to refer their complaint to the FINANCIAL OMBUDSMAN SERVICE, free of charge but you must do so within six months of the date of our final response letter.

If they do not refer their complaint in time, the Ombudsman will not have our permission to consider the complaint and so will only be able to do so in very limited circumstances. For example, if the Ombudsman believes that the delay was as a result of exceptional circumstances.

The Ombudsman might not be able to consider your complaint if:

- Outside the allocated time frame of more than six years ago, and
- The complaint was more than three years after they realised (or should have realised) that there was a problem.
- If we think that the complaint was made outside of these time limits, but this is a matter for the Ombudsman to decide.
- If the Ombudsman agrees with us, they will not have our permission to consider your complaint and so will only be able to do so in very limited circumstances.

**CONTACT DETAILS FOR THE FINANCIAL OMBUSDMAN SERVICE**

The Financial Ombudsman Service, Exchange Tower, London E14 9SR. Tel: 0800 023 4567 (free for most people ringing from a fixed line) or 0300 123 9123 (cheaper for those calling using a mobile) or 020 7964 0500 (if calling from abroad). Email: complaint.info@financial-ombudsman.org.uk Website: www.financial-ombudsman.org.uk

You can make a complaint through one of the FINANCIAL OMBUDSMAN SERVICES online forms, and find out more about the information you'll need to have to hand before you start filling the form in. Make a complaint online (financial-ombudsman.org.uk)

## 22. RESPONSIBILITY FOR THE POLICY

To be signed by all members of staff to confirm their understanding of this policy.

A signed copy to be kept on your personnel file, and to include annual training as a minimum. This policy will be reviewed and updated annually by the directors of the business.

**Complaints Contact Details**

| | |
|---|---|
| Name | Andrew Gough/ Ryan Teeling/ Lee Mcnicholas |
| Telephone Number | 0151 832 7133 |
| Email Address | contact@ralenergy.com |

For staff use only:

| | |
|---|---|
| Staff Name | |
| Staff Signature | |
| Date | |

**Policy Reviews**

This Policy Statement, along with any supporting documents, will be reviewed at least once a year and amended as required to ensure it remains up to date with any regulatory or internal business changes.

| | | | | | | |
|---|---|---|---|---|---|---|
| Dates Reviewed | AUG | | | | | |
| Initials | AG | | | | | |