

# COMPLAINTS POLICY



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Registered in England and Wales.

Registered No: 05614477 Authorised and regulated by the Financial Conduct Authority.

FCA Register No: 446677

This document sets out Spread Co's policy of receiving and dealing with complaints. Spread Co is committed to treating its customers fairly and to ensuring that any complaints that you may have about the products or services provided to you by Spread Co are dealt with promptly and fairly. If you have any questions about this document or on your rights of complaint to Spread Co, please do not hesitate to contact our Compliance Officer, who has responsibility for oversight of the Company's compliance with the FCA's rules in relation to client complaints.

The FCA has issued specific rules governing the manner in which regulated firms are to handle customer complaints (FCA Handbook: Dispute Resolution: Complaints (DISP)). The FCA's rules relating to complaints are designed to lay down minimum standards for the proper handling and resolution of complaints received from clients. This is to ensure that complaints are handled fairly, effectively and promptly, minimising the number of complaints that need to be referred to the Financial Ombudsman Service. This purpose is consistent with the FCA's consumer protection regulatory objective.

## **1. Making a Complaint**

If you are a client or a potential client of Spread Co and are a private individual or represent a business which employs fewer than 10 persons, has a turnover or annual balance sheet that does not exceed EUR 2M at the time the complaint is made to us and you are dissatisfied with any aspect of your dealings with Spread Co, you have the right to complain to us.

To help us investigate and resolve your complaint you need to provide us with certain information as follows:

- Your name and address
- Your account number (if you have one)
- A daytime telephone number or an email address so we can contact you
- A clear description of your complaint
- Details of how you would like it to be resolved

You may make such a complaint in writing, over the telephone, or in any other usual method of communication which is convenient for you. You can notify us by:

Email: Client Services [cs@spreadco.com](mailto:cs@spreadco.com)

Telephone: +44 (0)192 383 2682

Post: Client Services, 1st Floor North, Argyle House, Joel Street, Northwood Hills, Middlesex HA6 1NW

## **2. Dealing with your Complaint**

As soon as Spread Co receives your complaint, it will be referred to the relevant department within our business, who will investigate, assess and resolve your complaint. You may be contacted as to obtain additional information as necessary in relation to the complaint.

Where it was identified that retail customer has suffered foreseeable harm, as a result of acts or omissions by Spread Co, then it will act in good faith and take appropriate action to rectify the situation, including providing redress where appropriate. We will:

- 1) Investigate the circumstances which led to the foreseeable harm competently, diligently and impartially, obtaining additional information as necessary;
- 2) Assess fairly, consistently, and promptly:
  - A. the subject matter of the foreseeable harm;
  - B. what remedial action or redress (or both) may be appropriate;
  - C. if appropriate, whether Spread Co has reasonable grounds to be satisfied that another firm may be solely or jointly responsible for causing the foreseeable harm;
- 3) Comply promptly with any offer of remedial action or redress accepted by the retail customer.

Where it was identified that Spread Co has caused retail customer foreseeable harm, but which does not have a client relationship with that customer or the means to contact them, we shall take all reasonable steps to notify the customer.

Where it was identified that a retail customer has been caused harm, but Spread Co concludes that another firm in the distribution chain was the sole or joint cause of that harm, we will notify that other firm and provide appropriate information about the harm caused.

We will endeavour to resolve the complaint within three business days of receiving it. If we are unable to resolve your complaint within three business days of receiving it, we will acknowledge your complaint in writing and a member of our Compliance Department will be appointed to oversee and handle our investigation. We will keep you up to date as matters progress. You are free to contact us at any time if you have any questions.

At the earliest opportunity and within eight weeks of receipt of your complaint we will send a final written response to you which either:

- i. Accept the complaint and, where appropriate, offer redress or remedial action; or
- ii. Offer redress or remedial action without accepting the complaint; or
- iii. Reject the complaint and give our reasons for doing so; or
- iv. Explain why it is not possible to make a final response and indicate when we expect to be able to do so.

At this point we will also provide you with full details of how you can refer your complaint to the Financial Ombudsman Service if you are dissatisfied with our response. The Financial Ombudsman Service is an independent organisation that was established to resolve disputes between financial institutions and their customers.

### **3. Right to Refer to Financial Ombudsman Service**

You have the right to refer the matter to the Financial Ombudsman Service, if the response provided by Spread Co is not considered satisfactory or if it has been unable to provide a final response to your complaint within eight weeks of receiving it. Any referral to the Financial Ombudsman Service must take place within six months of the company's final response letter. Please note that the Financial Ombudsman Service will not consider a complaint until we have had the opportunity to address the complaint.

The Financial Ombudsman Service address is the following:

Financial Ombudsman Service, Exchange Tower, London, E14 9SR. Access the Financial Ombudsman Service website or contact them via email.

You can access a copy of the FOS explanatory leaflet at the following link:

<http://www.fos.org.uk/publications/consumer-leaflet.htm>