

**T H WHITE FINANCE
PROVISION & THE FCA –
COMPLAINTS HANDLING
POLICY AND PROCEDURE.**

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1 REGULATORY REQUIREMENTS

1.1. The Financial Conduct Authority requires T H WHITE Ltd ('T H WHITE') to have internal procedures for the reasonable and prompt handling of complaints.

1.2. Principle 6 of the FCA's Principles for Businesses requires T H WHITE to treat customers fairly. TCF (Treating Customers Fairly) Outcome 6 requires T H WHITE to ensure that customers do not experience any post-sale barriers such as experiencing difficulties in making complaints.

2 PURPOSE

2.1. The purpose of this document is to set out the policies and procedures that T H WHITE must follow to ensure the reasonable and prompt handling of complaints.

2.2. This document is to be used by all of T H WHITE's staff who will have interaction with customers in the course of T H WHITE providing its credit broking services and who can potentially receive customer complaints. This document provides a written framework to assist all relevant staff to identify customer complaints and deal with such in accordance with the policies and procedures set out herein.

3 DEFINITION OF AN ELIGIBLE COMPLAINT

3.0. An eligible complaint is a complaint which should be handled in accordance with the policies and procedures set out in this document. There are two components that determine whether a complaint is an eligible complaint, namely (1) the complaint must satisfy the definition in paragraph 3.1.1. below and (2) the complaint must be made by an eligible complainant.

3.1 DEFINITION OF A COMPLAINT

3.1.1. An eligible complaint is defined by the FCA as 'any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of a customer or potential customer about the provision of, or failure to provide, a financial service which alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience and relates to an activity of T H WHITE or any other organisation that T H WHITE has some connection to in marketing or providing financial services or products.'

3.1.2. In other words, a complaint is any expression of dissatisfaction about the provision of T H WHITE's credit broking services, whether justified or not.

3.2 ELIGIBLE COMPLAINANT

3.2.1. In order for a complaint to be an eligible complaint it must be made by an eligible complainant. An eligible complainant can be a consumer (i.e. a natural person acting for purposes outside his trade, business or profession). In the context of T H WHITE’s customer demographic consisting of mostly B2B transactions, eligible complainants are customers that are sole traders or small unincorporated partnerships. An eligible complainant also includes customers acting outside of the course of business such as individuals that own a large estate and require asset finance to fund the purchase of an all-terrain vehicle (‘ATV’) to facilitate travel around their estate.

3.2.2. It is to be noted that reference to a customer includes a potential customer.

4 MEANS OF MAKING A COMPLAINT

4.1. A customer can submit a complaint to T H WHITE in writing by emailing T H WHITE or by post. A customer can submit a complaint to T H WHITE verbally by way of telephony communication. Please refer to the contact details on the customer facing complaints procedure in Annex 1 below.

5 TIME BARRED COMPLAINT

5.1. As a matter of general policy, T H WHITE will not accept complaints which it receives from a customer more than six years after the events complained about or (if later) more than three years from the date the customer became aware (or ought reasonably to have become aware) that they had cause for complaint. The only exception to this general policy position is if the complainant demonstrates that there are exceptional circumstances surrounding the customer’s delay (e.g. the customer having been incapacitated for a period of time).

6 COMPLAINTS AWARENESS

6.1. T H WHITE makes consumers aware of its internal complaints procedure by publishing the same on its website and by providing complainants a copy of the same when acknowledging complaints. Please see Annex 1 for a copy of T H WHITE’s consumer facing complaints procedure.

7 COMPLAINTS ACKNOWLEDGEMENT

7.1. T H WHITE endeavours to send complainants a written acknowledgement of complaints within five working days of receiving a complaint. T H WHITE communicates a written acknowledgement by email rather than post due to the more cost-effective nature of the email communication.

8 COMPLAINTS FORWARDING

8.1. Should T H WHITE be in receipt of a complaint where it has reasonable grounds to be satisfied that another firm is solely or jointly responsible for the matter(s) alleged in the complaint, T H WHITE will forward the complaint to the respondent firm within five business days and inform the complainant in a final written response that T H WHITE is not the respondent and that T H WHITE has forwarded the complainant's complaint to the respondent and set out the contact details of the respondent for the complainant's attention. Please refer to Annexes 4 and 5.

9 COMPLAINTS INVESTIGATION

9.1. T H WHITE's processes to investigate the subject matter of complaints will entail reviewing its internal records pertaining to the complaint and, where further information is required, contact the complainant and obtain more information from them relating to the complaint. The objective of T H WHITE's complaints investigation process is to leverage as much independent information as possible relating to the subject matter of the complaint and corroborate this with the complainant's testimony. Where T H WHITE requires more information from the complainant it will typically contact the complainant by telephone. The key consideration with a telephone discussion is that T H WHITE will be able to gauge not just what the complainant states but how it is stated as well.

9.2. Where T H WHITE does not consider that it will be in a position to conclude its investigations and issue a final written response within 8 weeks, it will instead issue a holding response at the end of the 8th week after receiving the complaint advising the complainant that T H WHITE is not in a position to issue a final response and the date when it expects to be in such a position and inform customers that they now have a right to refer the complaint to the Financial Ombudsman Service.

9.3. Adrian Lovegrove (Agricultural Division Director) will be responsible for carrying out complaints investigations and resolving the same.

10 COMPLAINTS RESOLUTION

10.1 FINAL RESPONSE

10.1.1. T H WHITE will endeavour to issue a final written response to the complaint within eight weeks.

10.1.2. T H WHITE's final response will either:

10.1.2.1. Accept the complaint and, where appropriate, offer redress or offer to carry out remedial action;

10.1.2.2. Offer redress or to carry out remedial action without accepting the complaint;

or

10.1.2.3. Reject the complaint and give reasons for doing so.

10.2 SUMMARY RESOLUTION

10.2.1. T H WHITE does not provide complainants with a written complaints' acknowledgement and a written final response where T H WHITE resolves the complaint by close of business on the third business day following the day on which the complaint is received. T H WHITE instead provides complainants with a summary resolution communication. A summary resolution communication sets out:

8.2.1.1. The fact that a complaint has been made;

8.2.1.2. Informs the complainant that the complaint has now been resolved; and

8.2.1.3. Sets out the complainant's right to refer the complaint to the Financial Ombudsman Service should they subsequently be dissatisfied with the resolution and sets out the contact details of the Financial Ombudsman Service including its website.

11 GOVERNANCE

11.1 APPROVAL

11.1.1. T H WHITE's complaints handling policy and procedure has been approved by Faye Parsons (Finance Manager), Alexander Scott (Chief Executive Officer) and Adrian Lovegrove (Divisional Director).

11.2 DESIGNATED COMPLAINTS HANDLER

11.2.1. Adrian Lovegrove is T H WHITE's designated complaints handler in relation to complaints that pertain to T H WHITE's credit broking service. Adrian Lovegrove ensures independence in this role as Adrian Lovegrove is not operationally involved in the finance sales. Adrian Lovegrove is also responsible for liaising with the Financial Ombudsman Service ('FOS') in relation to complaints that are escalated to the FOS.

11.3 ROOT CAUSE AND TREND ANALYSIS

11.3.1. As the designated complaints handler, Adrian Lovegrove is responsible for conducting root cause and trend analysis of complaints. Adrian Lovegrove will conduct root cause analysis of complaints in the course of investigating and resolving complaints. Adrian Lovegrove will, on a bi-annual basis, conduct a trend analysis of complaints and communicate the findings of the same to the Division Review Board, this comprises of the divisional senior management team, Group Company Secretary, Group Finance Director and Group Chief Executive Officer. The Division Review Board will establish whether the trends indicate systemic deficiencies and, if so, they will agree on a remedial strategy to minimise complaints recurrences within the same theme.

11.3.2. In practice, Adrian Lovegrove conducts root cause and trend analysis by reviewing the subject matter of complaints (as communicated by customers) and reviewing complaints data recorded on T H WHITE's complaints register on a bi-annual basis.

11.4 FINANCIAL OMBUDSMAN SERVICE PAST DECISIONS

11.4.1. T H WHITE will check past FOS decisions on a bi-annual basis to ascertain the FOS' up to date approach and findings in relation to similar credit broking complaints to inform T H WHITE's ongoing approach to complaints handling. Adrian Lovegrove, in his capacity as designated complaints handler, will review the FOS' past decisions published on the FOS' website and share the findings with the Divisional Review Board.

11.5 INTERNAL AUDIT

11.5.1. T H WHITE will carry out internal audits to monitor that customer complaints are being appropriately identified. The internal audits will comprise of reviewing records of finance sales that have been carried out by telephone, namely call notes that T H WHITE representatives are required to make following a telephone call related to a finance transaction. T H WHITE will conduct the internal audit checks on a quarterly basis. The internal audits will be conducted by Alexander Scott.

11.5.2. T H WHITE will carry out internal audits on sample complaints handling cases to establish that the complaint was acknowledged within five business days, that the correct acknowledgement correspondence was communicated (e.g. a written acknowledgement or a complaints forwarding acknowledgement), that the final response appropriately addressed the subject matter of the complaint and notified the complainant of their FOS rights. T H WHITE's internal audits will include on FOS complainants and will seek to gain assurance that T H WHITE is liaising with the FOS expeditiously and with full cooperation.

11.5.3. T H WHITE may leverage The Compliance Company's expertise to provide external assurance on the internal audit set out above.

11.5.4. Where the internal audit process highlights deficiencies in T H WHITE's processes, Alexander Scott will make ameliorations to the processes contained in this document. Alexander Scott's changes will be furnished to Faye Parsons and Adrian Lovegrove for joint approval. Upon approval of the recommended changes to T H WHITE's complaints handling processes, this document will be updated and circulated to relevant staff.

11.6 REVIEW

11.6.1. T H WHITE's complaints handling policy and procedure, set out in this document, will be reviewed on, at least, an annual basis. An earlier review of T H WHITE's complaints handling policy and procedure will be triggered as a result of business model changes or by deficiencies that T H WHITE identifies through, for example, its ongoing monitoring activities.

11.6.2. Alexander Scott is responsible for conducting a review of T H WHITE's complaints handling policy and procedure or commissioning external expertise to conduct an external assurance of the same.

12 RECORD KEEPING

12.1 RECORD STORAGE

12.1.1. T H WHITE will store a copy of its complaints handling policy and procedure with its suite of corporate documents. T H WHITE will store a copy of its complaints handling records and complaints register. The rationale in retaining these records is to provide an audit trail of the operation of the processes set out in this document to enable effective supervision from the FCA.

12.1.2. T H WHITE will maintain a record of the internal audit checks that it carries out on an ongoing basis as set out above. This will form part of T H WHITE's compliance records. The purpose of maintaining such records is to evidence the operation of its internal audit checks.

12.1.3. T H WHITE will maintain a record of the annual reviews/periodic reviews that it carries out on the complaints handling policy and procedure. These records will include internal annual/periodic reviews (where triggered) and external assurance reviews that are carried out by The Compliance Company.

12.2 RECORD RETENTION

12.2.1. T H WHITE will maintain a record of this complaints handling policy and procedure whilst it subsists. T H WHITE will maintain a record of previous versions of its complaints handling policy and procedure for a period of six years. The rationale in maintaining a copy of previous versions of the complaints handling policy and procedure is to maintain an internal audit trail and to provide the FCA with an audit trail of previous processes in this regard to enable effective supervision.

12.2.2. T H WHITE will maintain a record of customer complaints and its complaints register for a period of six years. T H WHITE's complaints register will contain entries that are up to six years old before T H WHITE erases the same.

12.2.3. T H WHITE will retain a record of its internal audit checks, annual reviews/periodic reviews and external assurance reviews for a period of six years. The rationale in retaining these records for this period of time is to enable effective FCA supervision by maintaining a thorough audit trail to evidence the operations of the complaints handling policy and procedure documented herein.

13 REVIEW AND AMENDMENT LOG

| Version | Date | Author | Amendment Comments | Reviewed & signed-off by | Sign-off date |
|---------|------------|--------------|----------------------------------|--------------------------|---------------|
| - | 31/03/2021 | Peter Barker | | Peter Barker | 31/03/2021 |
| 1.0 | 05/04/2022 | Leanne Earle | Removed Peter Barker (retired) | Alex Scott | 05/04/2022 |
| 1.01 | 08/12/2022 | Alex Scott | Removed David Rapkins (resigned) | Alex Scott | 08/12/2022 |
| 1.02 | 31/03/2024 | Alex Scott | Removed Mike Edwards (resigned) | Alex Scott | 31/03/2024 |

ANNEX 1 – CONSUMER FACING COMPLAINTS PROCEDURE

Making a complaint

We endeavour to provide you with an excellent customer service however we acknowledge that, at times, we may fail to meet your expectations. Should you be dissatisfied with the provision or our failure to provide our finance broking service to you, you can make a complaint through any of the below channels:

- Telephone: 01454238181
- Email: adrian.lovegrove@thwhite.co.uk
- Post: Sherston Works, Knockdown, Sherston, Tetbury, GL8 8QY

What to expect from us?

We try to resolve complaints as soon as possible. Should we resolve your complaint by the close of the third business day following the day on which we receive your complaint, we will issue you with a written communication called a summary resolution communication acknowledging that you made a complaint and setting out that the complaint has been resolved and making you aware of your right to refer the complaint to the Financial Ombudsman Service should you be dissatisfied with the resolution.

Should we consider that we are not able to resolve the complaint by the close of the third business day, we will issue you with a written complaint acknowledgement within five working days. Thereafter, we will investigate your complaint in order to reach a fair resolution. Please note that investigating your complaint may require us to contact you in order to obtain further information about your complaint and the subject matter of the same.

We endeavour to issue you with a written final response within eight weeks.

What options do you have should you be dissatisfied with our final response?

Should you be dissatisfied with our final response, you have the right to refer your complaint to the Financial Ombudsman Service ('FOS'). The FOS is an independent body established to settle disputes between UK-based financial companies and consumers. You are able to refer your complaint to the FOS on any of the below contact details:

- Telephone: 0300 123 9 123
- Email: complaint.info@financial-ombudsman.org.uk
- Post: Exchange Tower, Harbour Exchange Square, London, E14 9SR
- Complain Online: <https://www.financial-ombudsman.org.uk/contact-us/complain-online>

It is to be noted that complaints must be referred to the FOS within six months of receiving a final response or a summary resolution communication.

You can find out more about the FOS by visiting <https://www.financial-ombudsman.org.uk/>.