



Complaints and Disputes Handling Policy

This document outlines the Complaints and Disputes Handling Policy for Smart Energy Pay Solutions Ltd.

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1. Version Control

Version	Version Description	Author	Reviewer	Date Approved	Description
1.0	Creation of policy	Phantom Compliance	CCO	15-May-2025	Initial creation of document
2.0	Scheduled updates	Phantom Compliance	CCO	01-Feb-2026	Minor updates and review, major formatting updates

2. Document Details

This section provides the key details of the document structure and purpose.

2.1 Process Name

Complaint and dispute handling policy contains:

- Introduction
- Business Model Brief
- Organizational Commitment
- Terms & Definitions
- Guiding Principles
- Complaint Management Systems
- Accountability & Learning



2.2 Objective/Goal

The document's objective is to outline the requirements for organizational complaint handling. Note that no organizational or regulatory requirement or obligation exists for Smart Energy Pay Solutions Ltd concerning complaint handling in Canada at this time. This policy represents our commitment to best practice.

This document serves the following purposes within Smart Energy Pay Solutions Ltd:

- **Customer Satisfaction:** Ensuring that customers have a clear and accessible process for lodging complaints and resolving disputes, which can improve overall customer satisfaction and loyalty.
- **Transparency:** Providing a transparent and structured approach to handling complaints and disputes, helps build trust with customers and stakeholders.
- **Resolution Efficiency:** Streamlining the process for addressing and resolving complaints and disputes promptly and fairly, minimizing the impact on both the customer and the organization.
- **Feedback and Improvement:** Collect valuable feedback from complaints and disputes, which can be used to identify areas for improvement and enhance products, services, and processes.
- **Compliance:** Ensuring that Smart Energy Pay Solutions Ltd meets legal and regulatory requirements related to complaint handling and dispute resolution.
- **Reputation Management:** Protecting and enhancing Smart Energy Pay Solutions Ltd reputation by demonstrating a commitment to addressing customer concerns and resolving issues effectively.
- **Conflict Reduction:** Reducing the likelihood of conflicts escalating by providing a formal mechanism for addressing grievances before they become more serious issues.



- **Accountability:** Holding Smart Energy Pay Solutions Ltd and its employees accountable for their actions and ensuring that there is a clear process for addressing and resolving issues that arise.
- **Consistency:** Providing a consistent approach to handling complaints and disputes, ensuring that all customers are treated fairly and equitably.

Smart Energy Pay Solutions Ltd will escalate all disputes and complaints received concerning Smart Energy Pay Solutions Ltd services.

The Federal Consumer Agency of Canada (FCAC) enforces consumer protection legislation, regulations, and industry commitments by federally regulated entities. These consumer protection measures include ensuring these regulated entities have a complaint-handling process in place.

2.3 Description

This document provides an internal/external reference for employees and partners to consult at any time.

2.4 Parent Process

None.

3. Introduction

3.1 Introduction

- The complaints handling process can make or break a business of any size or level of sophistication.



- Specifically in the crypto community, a business' reputation determines how willing users are to trust the Smart Energy Pay Solutions Ltd and ultimately the adoption of their products and services.
- The Smart Energy Pay Solutions Ltd is currently regulated/bound by the requirements of the Financial Ombudsman office in Canada but not by similar bodies such as the [FCA in the UK](#).
- We have adopted a model that embraces and promotes best practices concerning how we assess and address customer complaints.
- This policy is intended to ensure that we handle complaints fairly, efficiently, and effectively.
- Our complaint management system is intended to:
 - enable us to respond to issues raised by people making complaints in a timely and cost-effective way,
 - boost public confidence in our administrative process, and
 - provide information that can be used by us to deliver quality improvements in our products services, staff, and complaint handling.
- This policy guides our staff and people who wish to make a complaint on the key principles and concepts of our complaint management system.
- This policy broadly applies to disputes of transactions conducted within the Smart Energy Pay Solutions Ltd system by customers.



3.2 Business Model Brief

- The Smart Energy Pay Solutions Ltd provides several services to customers worldwide.
- The Smart Energy Pay Solutions Ltd is a business that has been incorporated in the country of Canada.
- The Smart Energy Pay Solutions Ltd is located at 1054-7070E Farrel Rd SE, Calgary, T2H0T2 Canada.
- The Smart Energy Pay Solutions Ltd is a business that offers payment services to users including the execution of payment transactions on behalf of users and the initiation of payments on the receipt of instructions via electronic means
- The Smart Energy Pay Solutions Ltd provides additional services including Neo Bank

3.3 Organizational Commitment

- The Smart Energy Pay Solutions Ltd expects staff at all levels to be committed to fair, effective, and efficient complaint handling.
- The following table outlines the nature of the commitment expected from staff and the way that commitment should be implemented.



Who	Commitment	How
CCO	Promote a culture that values complaints and their effective resolution	Report publicly on complaint handling. Provide adequate support and direction to key staff responsible for handling complaints. Regularly review reports about complaint trends and issues arising from complaints. Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly. Encourage staff to make recommendations for system improvements. Recognize and reward good complaint handling by staff. Support recommendations for product, service, staff, and complaint handling improvements arising from the analysis of complaint data.
Support Manager	Establish and manage complaint management system	Provide regular reports to CCO on issues arising from complaint handling work. Ensure recommendations arising out of complaint data analysis are canvassed with CCO and implemented where appropriate. Recruit, train, and empower staff to resolve complaints promptly and per the Smart Energy Pay Solutions Ltd policy. Encourage staff managing complaints to provide suggestions on ways to improve the organization's complaint management system. Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly. Recognize and reward good complaint handling
Support Staff	Demonstrate exemplary complaint handling practices	Treat all people with respect, including people who make complaints. Assist people make a complaint, if needed. Comply with this policy and its associated procedures. Keep informed about best practices in complaint handling. Provide feedback to management on issues arising from complaints. Provide suggestions to management on ways to improve the organization's complaints management system. Implement changes arising from individual complaints and the analysis of complaint data as directed by management.
All staff	Understand and comply with complaint handling practices.	Treat all people with respect, including people who make complaints. Be aware of complaint handling policies and procedures. Assist people who wish to make complaints access the complaints process. Be alert to complaints and assist staff in handling complaints resolve matters promptly. Provide feedback to management on issues arising from complaints. Implement changes arising from individual complaints and from the analysis and evaluation of complaint data as directed by management.



3.4 Terms & Definitions

Complaint

- Expression of dissatisfaction made to or about us, our products, services, staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.
- A complaint covered by this Policy can be distinguished from:
 - Staff grievances,
 - Public interest disclosures made by our staff,
 - Code of conduct complaints,
 - Responses to requests for feedback about the standard of our service provision or general support queries,
 - Reports of problems or wrongdoing merely intended to bring a problem to our notice with no expectation of a response,
 - Service requests,
 - Requests for information.

Complaint Management System

- All policies, procedures, practices, staff, hardware, and software used by us in the management of complaints.

Dispute

- An unresolved complaint escalated either within or outside of our organization.
- Disputes in the context of transactions may consist of:
 - Transactions that may be fraudulent or otherwise unauthorized.
 - Transactions that were not fulfilled, either through client error or an error by The Smart Energy Pay Solutions Ltd staff.



- Disputes in the context of a user's account consist of:
 - Transfers to unauthorized/unknown third-party platforms using global blockchain protocols or bank-based transfers such as the SWIFT network or other electronic funds transfers (EFTs).
 - Login or other activity to a user's account using their secure credentials that are unrecognized.
 - Instances of dispute or disagreement with a price index or fees charged on a transaction.

Feedback

- Opinions, comments, and expressions of interest or concern made directly or indirectly, explicitly or implicitly, to or about us, about our products, services, or complaint handling where a response is not explicitly or implicitly expected or legally required.

Service Request

- A service request may include:
 - Requests for approval,
 - Requests for action,
 - Routine inquiries about the organization's business,
 - Requests for the provision of services and assistance,
 - Reports of failure to comply with laws regulated by the organization,
 - Requests for explanation of policies, procedures, and decisions.

Grievance

- A clear, formal written statement by an individual staff member about another staff member or a work-related problem.



Anonymous Complaints

- We accept anonymous complaints and will investigate the issues raised where there is enough information provided.

Accessibility

- We will ensure that information about how and where complaints may be made to or about us is well publicized.
- We will ensure that our systems to manage complaints are easily understood and accessible to everyone, particularly people who may require assistance.
- If a person prefers or needs another person or organization to assist or represent them in the making and/or resolution of their complaint, we will communicate with them through their representative if this is their wish.
- Anyone may represent a person wishing to make a complaint with their consent (e.g., advocate, family member, legal or community representative, member of parliament, or another organization).
- There is no fee or surcharge for making or otherwise lodging a complaint.

4. Guiding Principles

4.1 Facilitate Complaints

People Focused

- We are committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures, products, and complaint handling.



- Any concerns raised in feedback or complaints will be dealt with within a reasonable time frame.
 - Complaints are generally acknowledged by The Smart Energy Pay Solutions Ltd support staff in writing within 7 days of receipt.
 - Complaints receive a formal written response from the Compliance within 30 days of receipt.
- People making complaints will be:
 - provided with information about our complaint handling process,
 - provided with multiple and accessible ways to make complaints,
 - listened to, treated with respect by staff, and actively involved in the complaint process where possible and appropriate, and
 - provided with reasons for our decision/s and any options for redress or review.

No Detriment Or Prejudicial Treatment Of Complainants

- We will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

Objectivity & Fairness

- We will address each complaint with integrity and in an equitable, objective, and unbiased manner.
- We will ensure that the person handling a complaint is different from any staff member whose conduct or service is being complained about.
- Conflicts of interest, whether actual or perceived, will be managed responsibly; in particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.



Flexibility

- Our staff is empowered to resolve complaints promptly and with as little formality as possible; we will adopt flexible approaches to service delivery and problem-solving to enhance accessibility for people making complaints and/or their representatives.
- We will assess each complaint on its merits and involve people making complaints and/or their representatives in the process as far as possible.

Confidentiality

- We will protect the identity of people making complaints where this is practical and appropriate.
- Personal information that identifies individuals will only be disclosed or used as permitted under the relevant privacy laws, secrecy provisions, and any relevant confidentiality obligations.

Managing Abusive Clients

- We are committed to being accessible and responsive to all people who approach us with feedback or complaints; at the same time our success depends on:
 - Our ability to do our work and perform our functions as effectively and efficiently as possible.
 - The health, safety and security of our staff, and
 - Our ability to allocate our resources fairly across all the complaints we receive.
 - When people behave unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work.



- As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same following this policy.

4.2 Complaint Response

Early Resolution

- Where possible complaints and disputes are resolved at first contact.

Responsiveness

- We will promptly acknowledge receipt of complaints.
- We will assess and prioritize complaints per the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately.
- The following guidelines apply:
 - Where a user has reported fraud or unauthorized access their account and card will be suspended pending investigation.
 - Where a user dispute is related to customer support practices or other non-fraud related reasons their account is not suspended.
 - Where a user is abusive to staff their account is suspended pending contact with the Compliance department.
- We are committed to managing people's expectations, and will inform them as soon as possible, of the following:
 - The complaints and disputes process.
 - The expected time frames for our actions.
 - The progress of the complaint and reasons for any delay.



- Their likely involvement in the process, and
- The possible or likely outcome of their complaint.
- We will advise people as soon as possible when we are unable to deal with any part of their complaint and provide advice about where such issues and/or complaints may be directed (if known and appropriate).
- We will also advise people as soon as possible when we are unable to meet our time frames for responding to their complaints and the reason for our delay.

4.3 Complaint Management System

Introduction

- When responding to complaints, staff should act per our complaint handling procedures as well as any other internal documents guiding the management of complaints.
 - Staff should also consider any relevant legislation and/or regulations when responding to complaints and feedback.
- The five key stages in our complaint management system are set out below.

Receipt

- Unless the complaint/dispute has been resolved at the outset, we will record the complaint and its supporting information. We will also assign a unique identifier to the complaint file.
- All complaints and disputes are tracked internally, and common causes for disputes are addressed on a case-by-case basis.
- The record of the complaint will document:
 - The contact information of the person making a complaint,



- Issues raised by the person making a complaint and the outcome/s they want,
- Any other relevant information about the complaint, and
- Any additional support the person making a complaint requires.
- This is tracked in an Excel sheet maintained by The Smart Energy Pay Solutions Ltd staff.

Acknowledgement

- We will acknowledge receipt of each complaint promptly, and preferably within 7 calendar days.
- Consideration will be given to the most appropriate medium (e.g., email, letter) for communicating with the person making a complaint.

Assessment

- After acknowledging receipt of the complaint, we will confirm whether the issue/s raised in the complaint is/are within our control.
- We will also consider the outcome/s sought by the person making a complaint and, where there is more than one issue raised, determine whether each issue needs to be separately addressed.
- When determining how a complaint will be managed, we will consider:
 - How serious, complicated, or urgent the complaint is,
 - How the person making the complaint is being affected,
 - The risks involved if the resolution of the complaint is delayed, and
 - Whether a resolution requires the involvement of other organizations.



Addressing Complaints

- After assessing the complaint, The Smart Energy Pay Solutions Ltd will consider how to manage it.
- To manage a complaint, we may:
 - Give the person making a complaint information or an explanation,
 - Gather information from the person that the complaint is about, or
 - Investigate the claims made in the complaint.
- We will keep the person making the complaint up to date on our progress, particularly if there are any delays.
- We will also communicate the outcome of the complaint using the most appropriate medium.
- Which actions we decide to take will be tailored to each case and take into account any statutory requirements.

Response & Record Keeping

- A response is issued to the complainant in writing within 30 days of receipt by Compliance.
- A record of all responses is maintained by Compliance.
- Common causes of complaint are addressed internally where relevant.
- The Federal Consumer Agency of Canada (FCAC) enforces consumer protection legislation, regulations, and industry commitments by federally regulated entities.
 - These consumer protection measures include ensuring these regulated entities have a complaint-handling process in place.



4.4 Accountability & Learning

Analysis & Evaluation

- We will ensure that complaints are recorded systematically so that information can be easily retrieved for reporting and analysis.
- Regular reports will be run on:
 - The number of complaints received,
 - The outcome of complaints, including matters resolved at the frontline,
 - Issues arising from complaints,
 - Systemic issues were identified, and
 - The number of requests we receive for internal and/or external review of our complaint handling.
- Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service, and make improvements.
- Both reports and their analysis will be provided to the CEO and senior management for review.

Monitoring

- We will continually monitor our complaint management system to:
 - Ensure its effectiveness in responding to and resolving complaints, and
 - Identify and correct deficiencies in the operation of the system.
- Monitoring may include the use of audits, complaint satisfaction surveys and online listening tools and alerts.

Continuous Improvement

- We are committed to improving the effectiveness and efficiency of our complaint management system; to this end, we will:
 - Support the making and appropriate resolution of complaints,



- Implement best practices in complaint handling,
- Recognize and reward exemplary complaint handling by staff,
- Regularly review the complaints management system and complaint data, a
- Implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.

5. Next Update

- 01-Feb-2026