



EUROPCAR GROUP UK LIMITED: COMPLAINT HANDLING POLICY

1. Rationale

Europcar Group UK offers a wide range of products and services to support its customers' business and personal needs. Our group mission is to be the preferred mobility service company for our customers.

1.1 Our complaint handling policy is integral to the successful delivery of our mission and within our Customer Services team we strive to drive a '*right first time, every time*' ethos across all areas of our business. Where we don't achieve this we will provide complaint resolution that is always professional, timely and of the highest quality to ensure complete customer satisfaction. Each complaint is recorded accurately, analysed for trends and root cause to allow feedback into our business as a means to actively improve our products and services with every customer interaction."

1.2 This policy defines our company framework for:

1.2.1 Delivering fair outcomes for customers that have a legitimate grievance and exercise their right to complain; and

1.2.2 Learning from the complaints by identifying and mitigating the underlying causes of them.

2. We have a clear and defined policy in place for complaint handling that mitigates risk by:

2.1 having a mature complaint handling protocol which includes

2.1.1 procedures, training and competence; and

2.1.2 testing that demonstrates fair customer outcomes;

2.2 complaint handling results that are consistently within service levels and robust root cause analysis which is used to analyse performance and give clear actions to drive continual improvement;

2.3 learning from the complaints which is fed back to the relevant business area as well as the wider Europcar Group.

3. Scope

We define a complaint as any oral or written communication (whether justified or not) from, or on behalf of, a person or business, about any aspect of the service we have provided and which alleges dissatisfaction, distress, inconvenience or any actual or potential financial loss.

4. Mandatory Requirements

Our Regulated Business team will ensure all complaints relating to our regulated hire product are handled in accordance with regulatory rules and guidance (including FCA guidelines).

5. Complaint Handling Principles

5.1 Consumer Awareness: Customers will be made aware of how to complain about any product or service.



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- 5.2 Receiving a Customer Complaint: we make it easy for a customer to complain.
- 5.3 Clarification of the Complaint: we will make sure that we understand the nature of the customer's complaint and seek further information if necessary.
- 5.4 Keeping the Customer Informed: we will make sure the customer is kept informed as to the status of the investigation into their complaint.
- 5.5 Assessing the Merits of the Complaint: we will investigate complaints competently, diligently and impartially and assess its merits fairly, consistently and promptly.
- 5.6 Communicating our decision: we will communicate our decision clearly and promptly, explaining why we have upheld or rejected the complaint and the reasons for any redress award.
- 5.7 The Solution: Where we uphold a complaint we will put the customer back into the correct position. Where a complaint is rejected, but we choose to make a payment to the customer, we will ensure this fairly reflects the circumstances of the case.
- 5.8 Dealing with complaints referred to the Financial Ombudsman Service ('FOS'): we will cooperate at all times with the FOS and any other complaint arbitration body (arbitrators) and comply promptly with all decisions, settlements or awards made by those bodies. Final decisions issued by the FOS, or other arbitrators, which change the complaint outcome will be reviewed, and we will take into account the reason for the change when dealing with other complaints of a similar type or nature.
- 5.9 Quality Assurance: we will ensure consistently fair complaint outcomes are achieved through outcome-focused quality assurance which is robust and timely.
- 5.10 Learning From Complaints:
- 5.11 We will record **all** complaints fully and accurately so that we can identify and record the underlying (root) causes of complaints.
- 5.12 We will analyse the root cause information that we obtain from our records and use this analysis to identify opportunities to improve our product and services offerings to customers. We will record the measures taken to address the problems, evaluate the potential customer benefit of improvement opportunities and where appropriate take action to prioritise and implement them.
- 5.13 We will then consider the wider implications of complaints for customers who have not complained and, where necessary, take appropriate action.
- 5.14 Record Keeping and Management Information (MI): we will maintain systems for recording complaints to facilitate production of MI in a manner that supports both effective complaints root-cause analysis and any reporting requirements that will be of benefit to our customers generally. Records will be retained, as a minimum, for the relevant period required by FCA DISP rules.

6. **Communication**

Procedures for communicating with customers and delivering consistently fair outcomes:



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- 6.1 Customers must be made aware how they can complain, kept informed of the progress and advised of any outcome in the quickest time possible
- 6.2 Customers must be able to make their complaints by any reasonable means including written, electronic mail, telephone, etc
- 6.3 Customers should be kept up to date with anticipated resolution dates (Service Level) and made aware if there is an occasion the Service Level will not be achieved. The following information should be included:
 - 6.3.1 Why we cannot issue a response
 - 6.3.2 When we expect to issue a response
- 6.4 The final response will be delivered orally or in writing as follows:
 - 6.4.1 The response upholds the complaint in full or in part and, where appropriate, offers redress or remedial action with an explanation of what is being offered and why; or:
 - 6.4.2 The response offers redress or remedial action without upholding the complaint; or
 - 6.4.3 The response rejects the complaint and gives reasons for doing so
 - 6.4.4 The response includes appropriate referral rights if the customer is eligible (or may be eligible) to refer their complaint to the FOS or other arbitration body; and
 - 6.4.5 Includes agreed wording such as in relation to jurisdiction
- 6.5 We will ensure that any written communications with customers are clear, concise and satisfy the following requirements:
 - 6.5.1 Avoid the use of unexplained technical terms, jargon and abbreviations. Where use of these is unavoidable a clear explanation must be provided
 - 6.5.2 They will be laid out in a logical structure and format
 - 6.5.3 Where template paragraphs are used, these must be relevant and where appropriate, tailored to specific circumstances of the case
 - 6.5.4 Take in to account any previous correspondence with the customer regarding the matter being complained about
- 6.6 Decision

All complaints will be investigated competently, diligently and impartially and will be decided upon promptly to ensure the achievement of a fair customer outcome and include observation of the following areas:

 - 6.6.1 Relevant laws, regulatory requirements and guidance
 - 6.6.2 Customer perception of events
 - 6.6.3 Customer's circumstances – including any vulnerabilities, the nature of their relationship with us (retail, professional, etc.)
 - 6.6.4 Evidence available
- 6.7 Redress



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The solutions offered to our customers are designed to reflect the circumstances of the customer detriment and where a complaint is upheld in the customer's favour we will strive to put the customer back in the position they would have been if the original problem leading to the complaint had not happened.

6.8 Root Cause Analysis

All complaints must be recorded accurately detailing underlying causes of complaints. We are committed to detailed analysis of all complaints received and use this analysis to improve products and services in order to reduce the incidence of complaints to the benefit of all our customers.

6.9 Training and Competence

6.9.1 All complaint handling staff are equipped with the skills and knowledge necessary to meet our objective of delivering the right outcome for the customers first time.

6.9.2 All staff allocated to manage complaints within the Regulated Business team are fully trained to handle the complaints they deal with and records are maintained demonstrating staff competency.

6.9.3 Annual refresher training is delivered to the Regulated Business team to ensure they are fully compliant at all times.

6.10 Performance and Reward

The Regulated Business team is not incentivised by case completion or other productivity targets.

6.11 Dissatisfied Customers

In the event a customer is not satisfied with the response and actions taken by Europcar then they can be referred to the BVRLA or FCA or FOS for further assistance.