Complaints and Disputes

Handling Policy

This document sets out the Complaints and Disputes Handling Policy of SMART ENERGY PROVIDER LLC for the Smart Energy Pays platform in the United States.

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1. Version Control

Version	Description	Author	Reviewer	Date Approved
1.0	Creation of policy	Compliance	Compliance Officer	15-May-2025
2.0	Scheduled review and formatting updates	Compliance	Compliance Officer	01-Feb-2026
3.0	U.S. version for SMART ENERGY PROVIDER LLC and the Smart Energy Pays platform	Compliance	Compliance Officer; approved by CEO	06-Oct-2026

2. Document Details

2.1. Process Name

Complaints and disputes handling. This policy covers:

- Introduction and business model
- Organizational commitment
- Terms and definitions
- How to make a complaint
- Guiding principles
- The complaint handling process
- Transaction and card disputes
- Escalation, accountability and learning

2.2. Objective

This policy sets out how we receive, handle and resolve complaints and disputes from our customers. It supports our obligations under applicable U.S. federal and state consumer protection laws, including the Electronic Fund Transfer Act and Regulation E, as well as the requirements of our card issuing bank, card program partner and Visa. The policy aims to achieve:

Goal	What it means
Customer satisfaction	Customers have a clear and accessible way to complain and resolve disputes.
Transparency	Customers understand the process, the timeframes and the reasons for our decisions.
Fair and prompt resolution	Complaints are resolved quickly, fairly and consistently.
Compliance	We meet legal, regulatory and partner requirements for complaint handling and error resolution.
Learning and improvement	We use complaint data to improve our products, services and processes.
Accountability	Staff and management are accountable for how complaints are handled.

2.3. Description

This document is a reference for employees, partners and customers.

2.4. Parent Process

This policy supports our Terms and Conditions (Section 29, How to make a complaint, and Section 33, Dispute resolution) and the Card Terms.

3. Introduction

3.1. Purpose

How we handle complaints has a direct impact on our customers' trust in us. This is especially true in financial services and digital assets. We see every complaint as an opportunity to put things right and to improve.

Our complaint management system is designed to:

- respond to complaints in a timely, fair and effective way;
- build confidence in our services and processes; and
- give us information we can use to improve our products, services, staff training and complaint handling.

This policy applies to complaints and disputes from customers about the Smart Energy Pays platform, including Accounts, Cards, payments, digital asset transactions, fees and customer service.

3.2. Business Model

- SMART ENERGY PROVIDER LLC ("Smart Energy Pay", "we", "us" or "our") is a Florida limited liability company (Florida document number L25000037694) with its principal office at 101 NE 43 St, Miami, FL 33137, United States of America.
- We are a financial technology company. We operate the Smart Energy Pays platform in the United States through www.smartenergypays.us and the Smart Energy Pays mobile app.
- Through the platform, customers can hold and convert supported digital assets, send and receive U.S. dollar payments by ACH and wire, and use the Smart Energy Pays Visa® Card, which is issued by a licensed bank partner (the "Issuer").
- We are not a bank. Card, banking and certain payment services are provided by our Issuer, card program partner and banking partners, and we work with them to resolve complaints and disputes that involve their services.

3.3. Organizational Commitment

We expect staff at all levels to be committed to fair, effective and efficient complaint handling.

Who	Commitment	How
Compliance Officer	Promote a culture that values complaints and their effective resolution	Review complaint reports and trends regularly; support staff who handle complaints; make sure regulatory and partner requirements are met; support improvements arising from complaint analysis; report to senior management
Head of Customer Support	Establish and manage an effective complaint management system	Report regularly to the Compliance Officer; make sure recommendations from complaint analysis are implemented; recruit, train and empower staff to resolve complaints promptly; recognize good complaint handling
Customer Support Staff	Demonstrate excellent complaint handling	Treat everyone with respect; help customers make a complaint; follow this policy and its procedures; give feedback to management on recurring issues; suggest improvements
All Staff	Understand and follow complaint handling practices	Know this policy; help customers access the complaints process; pass complaints on promptly; implement changes as directed by management

4. Terms and Definitions

Term	Definition
Complaint	An expression of dissatisfaction made to or about us, our products, services or staff, or the handling of a complaint, where a response or resolution is expected or legally required. A complaint can be made in writing, verbally or electronically.
Dispute	A disagreement about a specific transaction or Account activity, or a complaint that has not been resolved and has been escalated within or outside our organization.
Error	An unauthorized or incorrect electronic fund transfer, or another error covered by Regulation E or the Card Terms.
Feedback	Opinions or comments about our products, services or complaint handling where no response is expected or required.
Service request	A routine request, such as a request for information, help, an explanation of a policy or a change to an Account. Service requests are not complaints, but they become complaints if the customer is dissatisfied with how they are handled.

Transaction disputes may include:

- transactions that the customer believes are fraudulent or unauthorized;
- payments or conversions that were not completed, were completed for the wrong amount, or were delayed, whether because of a customer error or our error;
- Card transactions that the customer does not recognize, or where goods or services were not received or were not as described;
- disagreements about an exchange rate or fee charged on a transaction; and
- login or other Account activity that the customer does not recognize.

The following are not handled under this policy: staff grievances, whistleblower reports by staff and code of conduct matters, which are handled under our internal HR policies.

5. How to Make a Complaint

Channel	Details
In the app	In-app support chat
Email	support@smartenergypays.us
Mail	SMART ENERGY PROVIDER LLC, Attn: Complaints, 101 NE 43 St, Miami, FL 33137, United States of America
Urgent card issues	Freeze your Card in the app, or call the number on the back of your Card

To help us resolve your complaint quickly, please tell us:

- your name;
- the username, phone number and/or email address linked to your Account;
- what happened and when, including any transaction details; and
- how you would like us to put it right.

Making a complaint is free. You can make a complaint yourself, or through a representative such as a family member, attorney or advocate, with your consent. We also accept anonymous complaints and will investigate them where enough information is provided.

6. Guiding Principles

6.1. People Focused

- We welcome feedback and complaints about our services, systems, practices, products and complaint handling.
- People making complaints will be listened to, treated with respect, kept informed, and given reasons for our decisions and information about their options for further review.
- We make information about how to complain easy to find, and we make our process easy to understand and accessible to everyone, including people who need assistance.

6.2. No Detriment to Complainants

- We will take all reasonable steps to make sure that people are not treated unfairly because they made a complaint.

6.3. Objectivity and Fairness

- We handle each complaint with integrity, and in a fair, objective and unbiased way.
- The person handling a complaint will not be a staff member whose conduct or service is the subject of the complaint.
- Internal reviews of how a complaint was handled are carried out by someone other than the original decision maker.

6.4. Flexibility

- Staff are empowered to resolve complaints promptly and with as little formality as possible.
- We assess each complaint on its merits and involve the customer, or their representative, as much as possible.

6.5. Confidentiality

- We protect the identity of people making complaints where this is practical and appropriate.
- Personal information is used and disclosed only as permitted by our Privacy Policy and applicable privacy laws.

6.6. Managing Unreasonable or Abusive Conduct

We are committed to being accessible and responsive to everyone who contacts us. At the same time, we must protect the health, safety and wellbeing of our staff and use our resources fairly. Where a person behaves in an abusive, threatening or unreasonable way, we may limit how they can contact us. In serious or repeated cases, we may restrict or close the Account, as set out in our Terms and Conditions.

7. Complaint Handling Process

7.1. Timeframes

Stage	Our commitment
Early resolution	Wherever possible, we resolve complaints at first contact.
Acknowledgement	We acknowledge complaints in writing within 2 business days.
Full response	We aim to send a full written response within 15 business days. In complex cases we will explain the delay, and we will respond no later than 30 calendar days after receiving the complaint.
Card and electronic fund transfer errors	Handled within the timeframes required by Regulation E and the Card Terms (see Section 8).
Complaints received through a regulator	Handled within the timeframes set by the regulator, such as the Consumer Financial Protection Bureau's complaint portal.

7.2. Prioritization

We assess and prioritize complaints according to how urgent and serious they are. If a matter involves an immediate risk to a customer's funds, safety or security, we respond immediately and escalate it.

Situation	Action
Customer reports fraud, a lost or stolen Card, or unauthorized access	The Card is frozen and the Account may be restricted immediately to protect the customer while we investigate.
Complaint about customer service, fees or other non-fraud issues	The Account is not restricted.
Possible vulnerable customer, scam victim or elder financial exploitation	Escalated to Compliance as a priority.
Abusive conduct towards staff	Handled under Section 6.6.

7.3. The Five Stages

Stage	What we do
1. Receipt	We record the complaint in our customer support ticketing system with a unique reference number. The record includes the customer's contact details, the issues raised, the outcome they want, any supporting information and any assistance they need.
2. Acknowledgement	We acknowledge the complaint in writing, give the customer their reference number, and explain the process and expected timeframes.
3. Assessment	We confirm whether the issues are within our control, identify each issue that needs to be addressed, and consider how serious and urgent the complaint is, how the customer is affected, the risk of delay, and whether our Issuer or other partners need to be involved.
4. Investigation and resolution	We give an explanation, gather information, or investigate the complaint, working with our partners where needed. We keep the customer updated, particularly if there are delays.
5. Response and record keeping	We send a written response explaining our decision, the reasons for it, any remedy we offer and the customer's options if they are not satisfied. All complaints and responses are recorded and kept for at least 5 years.

Possible outcomes include an explanation or apology, correction of an error, a refund or reimbursement of fees, a goodwill payment, a change to our processes, or a decision that no further action is warranted, with our reasons.

If we cannot deal with part of a complaint, for example because it concerns a merchant or another company, we will say so and explain where the customer can take it.

8. Transaction and Card Disputes

8.1. Card and Electronic Fund Transfer Errors

Card transactions and other electronic fund transfers covered by the Electronic Fund Transfer Act and Regulation E are investigated together with our Issuer, in line with the Card Terms and applicable law. In general:

Step	Timeframe
Customer reports the error	As soon as possible, and no later than 60 days after the transaction first appears on the customer's statement or transaction history
Investigation	Within 10 business days of receiving the notice (20 business days for new accounts)
Provisional credit	If more time is needed, the amount in dispute is provisionally credited while the investigation continues, as required by Regulation E
Extended investigation	Up to 45 days (90 days for new accounts, point-of-sale and foreign-initiated transactions)
Result	The customer is told the result within 3 business days of completing the investigation. If there was an error, it is corrected promptly. If not, we explain why and the customer can request the documents we relied on.

The Card Terms set out the customer's full rights and liability for unauthorized Card transactions.

8.2. Merchant Disputes

If a customer has a problem with goods or services bought with their Card, we ask them to contact the merchant first. If the merchant does not resolve it, we will help the customer raise a dispute (chargeback) through the Issuer under Visa rules, where eligible.

8.3. Digital Asset and Payment Disputes

Digital asset transactions recorded on a blockchain are irreversible, and outgoing ACH and wire payments often cannot be recalled once sent. We will still investigate every dispute, correct any error on our side, attempt recalls where possible, and support customers who have been victims of fraud or scams, including by helping them report it to law enforcement.

9. Escalation Outside Smart Energy Pay

If a customer is not satisfied with our final response, they can:

- ask for an internal review by the Compliance Officer, who was not involved in the original decision;
- submit a complaint to the Consumer Financial Protection Bureau at www.consumerfinance.gov/complaint;
- contact the financial regulator or attorney general of their state; or
- pursue a claim under the dispute resolution section of our Terms and Conditions, which includes an arbitration agreement and a right to bring claims in small claims court.

Our final response to every complaint tells the customer about these options.

10. Accountability and Learning

10.1. Analysis and Evaluation

We record complaints systematically so that information can be easily retrieved for reporting and analysis. The Head of Customer Support prepares a monthly report, and the Compliance Officer reviews it and reports to the CEO and senior management at least quarterly. The reports cover:

- the number and types of complaints received;
- outcomes, including complaints resolved at first contact;
- response times against our commitments;
- recurring and systemic issues, and their root causes;
- complaints received through regulators; and
- requests for internal or external review.

10.2. Monitoring

We continuously monitor our complaint management system to make sure it is effective, and to identify and correct weaknesses. Monitoring includes audits, customer satisfaction surveys sent after complaints are resolved, and quality reviews of complaint handling.

10.3. Continuous Improvement

We are committed to improving how we handle complaints. We will:

- support customers in making complaints and resolve them appropriately;
- follow best practices in complaint handling;
- recognize excellent complaint handling by staff;
- regularly review our complaint management system and complaint data; and
- make changes to our products, services and processes based on what we learn.

11. Next Update

This policy is reviewed at least once a year, and sooner if there is a significant change in our services, partners or applicable law. Next scheduled review: October 2027.