



Complaints & Disputes Handling



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Version Control

Version	Version Description	Author	Reviewer	Date Approved	Description
1.0	Creation of policy.	Phantom Compliance		31-JAN-2023	Initial creation of document
1.1	Scheduled update, minor changes.	Phantom Compliance		31-JUL-2023	Minor formatting updates
2.0	Scheduled update, minor changes.	Phantom Compliance		07-MAY-2024	Major formatting and design updates.



Document Details

2.1 PROCESS NAME

Complaint Handling – contains:

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

2.2 OBJECTIVE/GOAL

Document objective is to outline the requirements for organizational complaint handling. Note that no organizational or regulatory requirement or obligation exists for Advanced Payment Solutions Canada Inc. ("APS") with regard to complaint handling in Canada at this time. This policy represents our commitment to best practice.

APS will escalate all disputes/chargebacks/complaints received in relation to the Card Brand to Card Issuer and the bank.

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.

APS will immediately notify the bank of any potential legal action or escalation to any government bodies. APS will track and record all complaints/ escalations and their resolutions.

2.3 DESCRIPTION

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

2.4 PARENT PROCESS

None.

2.5 OWNERSHIP

	Primary	Secondary
Name	Ryan Mueller	
Designation	Creation of Policy	
Department	Phantom Compliance	
Email	compliance@aps.money	

Introduction

3.1 OVERVIEW

ITEM 1: INTRODUCTION

- The complaints handling process can make or break a business of any size or level of sophistication.
- Specifically in the crypto and payments community, a business' reputation determines how willing users are to trust the company and ultimately the adoption of their products and services.
- APS is currently regulated/bound by the requirements of 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 practice with regard to 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:
 - o enable us to respond to issues raised by people making complaints in a timely and cost-effective way
 - o boost public confidence in our administrative process, and
 - o provide information that can be used by us to deliver quality improvements in our products, services, staff and complaint handling.
- This policy provides guidance to 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 either on the APS card OR of transactions conducted within the APS system by customers as well.

ITEM 2: BUSINESS MODEL BRIEF

- APS provides a number of services to customers worldwide
- APS is a business that has been incorporated in the country of Canada
- APS is located at #490-4 Bow Valley Square 3, 255 5 Ave SW, Calgary, Alberta
- APS is a business that offers a full array of payment services
- By supplying a payment service to users, APS is able to provide an easily accessible service
- APS is a Payment Service Provider (PSP), with product & software solutions based on Stellar Blockchain Open Network. APS brings turnkey payment solutions for businesses of all sizes.

ITEM 3: ORGANIZATIONAL COMMITMENT

- APS 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	<p>Report publicly on complaint handling.</p> <p>Provide adequate support and direction to key staff responsible for handling complaints.</p> <p>Regularly review reports about complaint trends and issues arising from complaints.</p> <p>Encourage all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly.</p> <p>Encourage staff to make recommendations for system improvements.</p> <p>Recognise and reward good complaint handling by staff.</p> <p>Support recommendations for product, service, staff and complaint handling improvements arising from the analysis of complaint data.</p>

Support Manager	Establish and manage our complaint management system.	<p>Provide regular reports to CCO on issues arising from complaint handling work.</p> <p>Ensure recommendations arising out of complaint data analysis are canvassed with and implemented where appropriate.</p> <p>Recruit, train and empower staff to resolve complaints promptly and in accordance with the company's policies and procedures.</p> <p>Encourage staff managing complaints to provide suggestions on ways to improve the organisation's complaint management system.</p> <p>Encourage all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly.</p> <p>Recognise and reward good complaint handling</p>
Support Staff	Demonstrate exemplary complaint handling practices	<p>Treat all people with respect, including people who make complaints.</p> <p>Assist people make a complaint, if needed.</p> <p>Comply with this policy and its associated procedures.</p> <p>Keep informed about best practice in complaint handling.</p> <p>Provide feedback to management on issues arising from complaints.</p> <p>Provide suggestions to management on ways to improve the organisation's complaints management system.</p> <p>Implement changes arising from individual complaints and from the analysis of complaint data as directed by management.</p>
All staff	Understand and comply with complaint handling practices.	<p>Treat all people with respect, including people who make complaints.</p> <p>Be aware of complaint handling policies and procedures.</p> <p>Assist people who wish to make complaints access the complaints process.</p> <p>Be alert to complaints and assist staff handling complaints resolve matters promptly.</p> <p>Provide feedback to management on issues arising from complaints.</p> <p>Implement changes arising from individual complaints and from the analysis and evaluation of complaint data as directed by management.</p>

3.2 TERMS & DEFINITIONS

ITEM 1: 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:
 - o staff grievances
 - o public interest disclosures made by our staff
 - o code of conduct complaints
 - o responses to requests for feedback about the standard of our service provision or general support queries
 - o reports of problems or wrongdoing merely intended to bring a problem to our notice with no expectation of a response
 - o service requests
 - o requests for information

ITEM 2: COMPLAINT MANAGEMENT SYSTEM

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

ITEM 3: DISPUTE

- An unresolved complaint escalated either within or outside of our organization.
- Disputes in the context of card transactions consist of:
 - o Transactions that may be fraudulent or otherwise unauthorized
 - o Transactions conducted with merchants and retailers that may not have delivered service to the cardholder in a satisfactory fashion
 - o Transactions that were not fulfilled, either tangible product or intangible service, by the merchant
 - o Transactions that are not recognized by the cardholder
- Disputes in the context of a user's account consist of:
 - o 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)

- o Login or other activity to a user's account using their secure credentials that are unrecognized
- o Instances of dispute or disagreement with a price index or fees charged on a transaction
- Note that not all disputes become chargebacks, however MOST chargebacks are preceded by disputes

ITEM 4: CHARGEBACK

- A chargeback occurs when a user actively disputes and revokes authorization for a transaction via their issuing bank
- Chargebacks typically occur for non-delivery of service/products, low quality merchandise, or reasons of fraud
- Chargeback handling is done between the issuing bank and APS

ITEM 5: 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.

ITEM 6: SERVICE REQUEST

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

ITEM 7: GRIEVANCE

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



Guiding Principles

4.1 FACILITATE COMPLAINTS

ITEM 1: 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.
 - o Complaints are generally acknowledged by the CCO in writing within 7 days of receipt
 - o Complaints receive a formal written response from the CCO within 30 days of receipt
- People making complaints will be:
 - o provided with information about our complaint handling process
 - o provided with multiples and accessible ways to make complaints
 - o listened to, treated with respect by staff and actively involved in the complaint process where possible and appropriate, and
 - o provided with reasons for our decision/s and any options for redress or review

ITEM 2: 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.

ITEM 3: ANONYMOUS COMPLAINTS

- We accept anonymous complaints and will carry out an investigation of the issues raised where there is enough information provided.

ITEM 4: 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, another organization).
- There is no fee or surcharge for making or otherwise lodging a complaint.

4.2 COMPLAINT RESPONSE

ITEM 1: EARLY RESOLUTION

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

ITEM 2: RESPONSIVENESS

- We will promptly acknowledge receipt of complaints.
- We will assess and prioritize complaints in accordance with 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 quality of an item, customer support practices, or other non-fraud related reason 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 complaint and the reason for our delay.

ITEM 3: 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 interests, 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.

ITEM 4: FLEXIBILITY

- Our staff are 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 representative in the process as far as possible.

ITEM 5: 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 by the as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

ITEM 6: 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 in the most effective and efficient way 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 in accordance with this policy.

4.3 COMPLAINT MANAGEMENT SYSTEM

ITEM 1: INTRODUCTION

- When responding to complaints, staff should act in accordance with our complaint handling procedures as well as any other internal documents providing guidance on 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.

ITEM 2: 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, common causes for dispute such as non-performing merchants or similar are addressed on a case-by-case basis.
- The record of the complaint will document:
 - o the contact information of the person making a complaint
 - o issues raised by the person making a complaint and the outcome/s they want
 - o any other relevant and
 - o any additional support the person making a complaint requires.
- This is tracked in an Excel sheet maintained by Compliance.

ITEM 3: 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.

ITEM 4: 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:
 - o How serious, complicated or urgent the complaint is
 - o Whether the complaint raises concerns about people's health and safety
 - o How the person making the complaint is being affected
 - o The risks involved if resolution of the complaint is delayed, and
 - o Whether a resolution requires the involvement of other organizations.

ITEM 5: ADDRESSING COMPLAINTS

- After assessing the complaint, we 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 product, person or area 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.

ITEM 6: RESPONSE & RECORD KEEPING

- A response is issued to the complainant in writing in 30 days of receipt by Compliance.
- A record of all responses is maintained by Compliance.
- Common causes of complaint are addressed internally where relevant.
- APS will escalate all disputes/chargebacks/complaints received in relation to the Card Issuer to the bank.
- 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.
- APS will immediately notify the Issuing bank of any potential legal action or escalation to any government bodies. The company will track and record all complaints/ escalations and their resolutions.

4.4 ACCOUNTABILITY & LEARNING

ITEM 1: ANALYSIS & EVALUATION

- We will ensure that complaints are recorded in a systematic way 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 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.

ITEM 2: MONITORING

- We will continually monitor our complaint management system to:
 - o ensure its effectiveness in responding to and resolving complaints, and
 - o 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.

ITEM 3: CONTINUOUS IMPROVEMENT

- We are committed to improving the effectiveness and efficiency of our complaint management system. To this end, we will:
 - o support the making and appropriate resolution of complaints
 - o implement best practices in complaint handling
 - o recognize and reward exemplary complaint handling by staff
 - o regularly review the complaints management system and complaint data, and
 - o implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.

Next Update

- 31-JUL-2025

