



**AutoMoney Limited**

**Customer Reviews and Marketing Compliance Policy**

**V1.0 May 2025**

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## 1. Scope

This Customer Reviews and Marketing Compliance Policy ("**Policy**") applies to all AutoMoney Limited ("**AML**") employees, introducers, and affiliates who engage in review-related activities.

## 2. Amendments and Review Principles

Any amendments to this Policy will require approval by the Senior Management Team ("**SMT**").

This Policy will be reviewed on at least an annual basis or more frequently as required by business activities and/or regulatory requirements.

## 3. Version Control Log

Version No	Approved by SMT	Effective From	Details of Change
1.0	01/05/25	01/05/25	First version of document.

## 4. Definitions

For the purposes of this Policy:

- "**Fake review**" means a review that is fabricated, not based on a genuine customer experience, or influenced by improper incentives.
- "**Cherry-picking**" refers to the practice of selectively requesting or displaying only positive reviews.
- "**Selective solicitation**" is when feedback is only requested from customers with known or assumed positive experiences.
- "**Introducers**" / "**Affiliates**" are any third parties who refer customers to AML and may be involved in customer communications.

## 5. Purpose and Scope

The Digital Markets, Competition and Consumers Act 2024 ("**DMCCA**") introduces strict legal requirements regarding the collection, publication, and use of consumer reviews to prevent misleading practices. As a hire purchase lender, AML does not host its own reviews but actively encourages customers to provide feedback via independent third-party platforms (e.g. Trustpilot and Google Reviews).

This Policy outlines AML's approach to complying with the DMCCA and ensuring transparency and fairness in how reviews are solicited, used in marketing, and monitored for fraudulent activity. AML's commitment to compliance includes:

- fair and neutral solicitation of customer reviews;
- accurate representation of customer feedback in marketing materials;
- proactive detection and mitigation of fraudulent or misleading reviews; and
- clear responsibilities for ensuring compliance across business functions.

Failure to comply with DMCCA obligations could expose AML to regulatory enforcement, reputational harm, and financial penalties. This Policy mitigates these risks by implementing robust controls and oversight mechanisms.

This Policy also reflects AML's obligations under:

- FCA Principles for Business including Principle 6 (Treating Customers Fairly);
- the CAP Code (UK Code of Non-broadcast Advertising); and
- Consumer Protection from Unfair Trading Regulations, especially as they relate to the use of testimonials and consumer perception.

## **6. Interaction with the FCA's Consumer Duty**

In addition to the DMCCA, AML aligns this Policy with the FCA's Consumer Duty (Principle 12 and PRIN 2A), which requires firms to deliver good outcomes for customers. This includes:

- acting in good faith by ensuring customer reviews are accurate, representative, and fairly presented;
- enabling informed decision-making by providing unbiased access to customer feedback; and
- avoiding foreseeable harm by preventing misleading, fake, or manipulated reviews that could distort consumer choices.

## **7. Soliciting Reviews – Fair and Unbiased Approach**

### **7.1 Overview**

Under Section 219B(2) of the DMCCA, businesses must not solicit, commission, or encourage fake reviews or engage in practices that mislead consumers about the authenticity of reviews.

AML ensures compliance by applying a consistent, non-selective approach across all customer interactions. This means all customers, regardless of their experience, are given an equal opportunity to provide feedback.

### **7.2 How this works in practice**

- **During onboarding:** After customers complete their hire purchase agreement, they are asked if they would like to leave a review. If they agree, they receive a direct link to, for example, Trustpilot or Google Reviews via SMS or email.
- **During complaints handling:** Customers who receive a Final Response Letter (“FRL”) following a complaint are provided with a review link within that FRL, giving them the opportunity to share their feedback—whether positive or negative.
- **Upcoming changes for collections:** From May 2025, AML will begin incorporating review solicitation into customer communications within the collections journey, ensuring all aspects of the customer lifecycle are covered.

### 7.3 Solicitation controls and responsibilities

Area	Responsibility	Ownership
Onboarding journey – inviting customers during validation all	New Business Team	Validation Call script controlled by Head of Operations and Compliance Director
Complaints handling – review link in FRLs	Compliance Team	FRL template controlled by Compliance Director
Collections journey – integrating review solicitation by May 2025	Customer Support Team	Customer communication templates controlled by Head of Operations and Compliance Director

### 7.4 Additional controls

- Templates and scripts ensure **all** customers receive the opportunity to provide a review.
- Monitoring by first-line (Operational Teams) and second-line (Compliance Team) quality assurance.
- System-level controls prevent selective solicitation.
- No incentives or rewards are offered for reviews (enforced by SMT).
- Opt-in model during validation calls; self-engagement in written communications.

## 8. Preventing Fake and Misleading Reviews

### 8.1 Overview

Under Section 219C of the DMCCA, businesses must take reasonable and proportionate steps to prevent fake or manipulated reviews.

### 8.2 How this works in practice

- **Review:** AML monitors review trends to identify potential fake reviews (e.g., sudden spikes in positive or negative reviews).

- **Report:** AML reports suspicious reviews to the hosting firm (e.g. Trustpilot or Google) for investigation.
- **Respond:** AML responds publicly to false claims, ensuring misleading content is not left unchallenged.

### 8.3 Prevention controls and responsibilities

Control Area	Responsibility
Risk assessment of review activity	Head of Operations and Compliance Director
Reporting fake reviews	Head of Operations and Marketing Executive
Responding to false claims	Head of Operations and Compliance Director

### 8.4 Additional control

- Quarterly review analysis conducted by Head of Operations and reported to AML's board of directors.

## 9. Marketing Use of Reviews

### 9.1 Overview

Under Section 219B(1) of the DMCCA, businesses must not misrepresent customer feedback by selectively publishing positive reviews or displaying misleading star ratings.

### 9.2 How this works in practice

- AML will integrate a review widget (where feasible) on its website and digital channels to ensure customers can always see the full, unfiltered review history. This ensures that potential customers see a balanced and real-time reflection of customer feedback.
- All marketing materials featuring customer reviews will include AML's current overall average rating, for example, *"Rated 4.5/5 on Trustpilot (as of April 2025)."*
- If a customer quote is used in advertising, it must be accompanied by AML's most recent star rating to prevent cherry-picking.
- Marketing content is reviewed quarterly for compliance with advertising standards (CAP Code).

## 10. Enforcement Against Third-Parties

### 10.1 Overview

If an introducer, affiliate, or broker is found to have engaged in misleading review practices, AML reserves the right to take enforcement action to maintain compliance.

## 10.2 Third-party controls and responsibilities

Action	Responsibility
Investigating non-compliance	Head of Operations and Compliance Director
Issuing formal warnings	Compliance Director and legal representatives
Terminating third-party relationships	Chief Executive
Reporting linked fake reviews	Head of Operations and Marketing Executive

### 10.3 Enforcement examples

- Fabrication of customer reviews → Immediate termination of relationship.
- Use of incentives to obtain reviews → Formal warning and retraining.
- Failing to disclose manipulation of reviews → Legal escalation and reporting to regulators.

## 11. Rewards and Recognition

No employee or third party may be rewarded for securing a positive review.

Recognition is based on overall customer service performance and compliance with this Policy.

## 12. Reporting and Communication

This Policy is publicly available on AML's website.

For inquiries, contact AML's Compliance Team at [complaints@ammf.co.uk](mailto:complaints@ammf.co.uk).

## 13. Continuous Improvement

AML will periodically review and enhance its review-related processes based on customer feedback, regulatory updates, and industry best practices.

## 14. Roles and Responsibilities

Roles and responsibilities are outlined in relevant sections above.

All staff involved in review-related activities must complete an annual attestation that they have read and understood this Policy.

## **15. Confidentiality**

All information obtained during the review and monitoring process must be handled in accordance with AML's Data Protection Policy.

## **16. Conflict Resolution**

Any disputes or concerns regarding review-related practices should be escalated to the Compliance Director.

Internal whistleblowing procedures are available for reporting unethical conduct.

## **17. Recordkeeping**

All review solicitation communications, monitoring logs, customer responses, and quality assurance activities must be retained for a minimum of 6 years and made available to regulators upon request.