

# Complaint Handling

## Policy

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# Overview

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## Purpose

Linfox Armaguard Pty Ltd (ACN 099 701 872) (**Armaguard**) has provided an enforceable undertaking to the Australian Competition and Consumer Commission pursuant to section 87B of the *Competition and Consumer Act 2010* (Cth) (**Undertaking**). The purpose of this Complaint Handling Policy (**Policy**) is to outline Armaguard's approach to the management of customer complaints related to Armaguard's compliance with the Undertaking, and to ensure there is an accessible, clear and timely process when lodging a complaint, concern, or providing general feedback to or about the organisation.

This Policy is designed to ensure that such customer complaints are managed through an effective and consistent framework that includes (but is not limited to) procedures, complaint response timelines and escalation procedures, that respond to the different queries or complaints of complainants and, meet the requirements of the Guidelines for Complaint Management in Organisations (AS 10002:2022). This Policy may be updated from time to time but will remain compliant with (AS 10002:2022).

## Complaint Definition

Complaint means an expression of dissatisfaction made to Armaguard by a customer of Armaguard, related to its compliance with the Undertaking. A Complainant is a person that makes a Complaint.

# Complaint Handling Policy

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## Introduction

At Armaguard we strive to provide the best possible service experience for all our customers. We understand that there may be times when customers are dissatisfied with our service, and we take these concerns seriously.

Armaguard is committed to ensuring that all customer complaints are managed in a responsive, efficient, effective and fair manner. Complainants will be treated with respect and will be dealt with at a professional level throughout the complaint management process.

## Principles

**Accountability:** We take accountability for our actions and take responsibility for any mistakes or errors. We will work to rectify any issues and take steps to ensure they do not happen again in the future.

**Empathy:** We will approach every complaint with empathy and understanding. We will listen to our customers concerns and work to find a resolution that meets their needs.

**Acknowledgement:** We will acknowledge all complaints in a timely manner. We will provide our customers with an estimated time for resolution and keep them informed throughout the process.

**Investigation:** We will thoroughly investigate every complaint to determine the cause and identify any corrective actions necessary.

**Timeliness:** We will work to resolve complaints in a timely manner. We understand that time is of the essence in resolving complaints and will make every effort to provide a timely and appropriate resolution.

**Resolution:** We will work to resolve complaints in a timely and satisfactory manner. We will take responsibility for any mistakes or errors and work to make things right for our customers.

**Transparency:** We will be transparent about our complaint handling process. We will explain our policies and procedures to our customers and provide them with clear and concise information on the steps we are taking to resolve their complaint.

**Customer Satisfaction:** Our goal is to ensure that customers are satisfied with our resolution. We encourage feedback from our customers to ensure we have met their needs and will take steps to improve our processes if necessary.

**Continuous improvement:** We will use customer feedback to improve our services if required. We will review complaints to identify any trends and take steps to prevent similar issues from recurring.

**Complaint Escalation:** If a complaint cannot be resolved at the initial level, we have a defined escalation process in place. Our customers can escalate their complaint to a higher level of management if they are not satisfied with the resolution provided.

**Record Keeping:** We will maintain detailed records of all complaints received and the actions taken to resolve them. This information will be used to continually improve our processes and that we are providing the best possible service to our customers.

At Armaguard we believe that effective complaint handling is essential to building and maintaining long lasting partnerships with our customers. Armaguard is committed to delivering high quality services and welcomes feedback on its products, services, performance, and staff as a means of monitoring and improving service delivery to our customers, as well as enhancing organisational effectiveness and efficiency. By following these principles, we are confident that we can provide our customers with an effective complaint handling process that meets all applicable requirements.

## Complaints Handling Procedures

### Availability of Complaints Handling Policy

Details of the Policy are published on Armaguard's website and made available to all staff and to other persons when they request information about our complaints handling procedures or wish to make a complaint regarding Armaguard's compliance with the Undertaking. All staff will be made aware of this Complaints Handling Policy and the Armaguard personnel directly responsible for its implementation.

### Remedies

In managing a complaint, a range of responses can be offered including remedial action, technical assistance, information, financial redress, an apology, reissue or variation of documentation, goodwill gesture or other appropriate remedy.

When formulating a response, consideration will be given to whether:

- all aspects of the complaint have been addressed.
- follow-up communication is needed; and
- it is appropriate to offer remedies to others who may have suffered in the same way as the complainant but who did not make a formal complaint.

### Complaints Handling Framework

Armaguard's framework for handling complaints is set out in the flow chart in **Annexure A** and includes:

- escalation of complaints which cannot be resolved at first instance; and
- levels of authority.

Complaints may be received verbally or in writing and should be raised by the Complainant as soon as reasonably practicable. All complaints will initially be received by a member of the Armaguard Customer Service team.

## Complaints Handling Process

The procedures for handling complaints are set out in the Complaints Handling Process in **Annexure B**, which covers, among other things:

- verbal and written complaints;
- recording of complaints;
- resolution of complaints, including minimising disputes; and
- external dispute resolution system.

Armaguard will continue to comply with its contractual obligations throughout the Complaints Handling Process.

## Information about complaint

On receipt of a complaint under this Policy, Armaguard must inform:

- the Complainant of:
  - the existence of the Undertaking (and specifically the dispute resolution process to an Independent Expert contained in the Undertaking) and provide the Customer with a copy of the Undertaking; and
  - the details of the Independent Auditor (as appointed under the Undertaking); and
  - the Independent Auditor that such a complaint has been made.

Armaguard shall have the right to gain sufficient information about the complaint to enable it to properly investigate and respond to the complaint.

## Complaints Manager and staff who carry out complaints handling procedures.

Responsibility for these roles will be appointed once the Armaguard Customer Service structure is finalised and prior to merger completion.

Armaguard staff who carry out the Complaints Handling Procedures are trained in product and service knowledge, interpersonal and communications skills as well as the policies and procedures of Armaguard.

These employees have resources that enable them to perform their duties efficiently and effectively for the benefit of customers.

## Response Times

Armaguard endeavours to respond to complaints as soon as possible. To ensure Armaguard is responsive to any complaints or disputes that may arise from a customer, Armaguard has established time limits (**Response Times**) regarding the processing and resolution of such complaints or disputes (**Annexure C**). Armaguard will keep complainants informed about the progress of their complaint in line with the established time limits by contacting them via an appropriate medium. On receiving a complaint from a customer, Armaguard will inform the customer of the Response Times relevant to their complaint.



## Resolution of complaints

If the complaint is not able to be resolved using the Complaints Handling Process, then there must be a meeting (or a series of meetings) between a senior executive of Armaguard and a senior executive of the Customer to make a final attempt to resolve the dispute.

If the complaint remains unresolved following such a meeting (or meetings) then either party may initiate a dispute using the appropriate dispute resolution process being either: (i) the process contained in the Undertaking with escalation to the Independent Expert (ii) the process contained in the contractual arrangements between Armaguard and the Customer or, (iii) an external dispute resolution avenue and (where appropriate) Armaguard may make suggestions about possible avenues available to the Complainant.

The timeframes for such unresolved complaints are outlined at **Annexure B** of this Policy.

## Data Collection

### Relationships database

Armaguard manages complaints through the use of a relationships database (the **Relationships Database**).

The following is entered onto the Relationships Database by the relevant member of the Customer Service team:

- The details of the complaint; at the time they receive notice of the complaint;
- The details of the action taken, at the time any action is taken in relation to the complaint; and
- The details of the resolution when the complaint is resolved.

## Compliant Reports

The Relationships Database is made up of individual Complaint Reports for each Complaint. A Complaint Report includes the following information:

- The nature and date of the complaint;
- How the complaint was made;
- The details of the Complainant;
- Who the complaint concerned, if relevant;
- The products, services or business practices about which the complaint is made;
- The estimated response time conveyed to the Complainant, or if resolved the actual response time;
- The referral source; and
- The action taken including remedies, determinations, results and client satisfaction level.

A sample Complaint record is attached in **Annexure D**.

## **Compliance reporting**

Material complaints are captured in quarterly compliance reports by the Complaints Manager to senior management / the Board. The report should cover numbers and types of complaints and recommend remedial action to address them. For example, provision of further representative training and development of new procedures.

## **Accessibility**

Complaints can be made via the Customer Service Centre advertised on the Armaguard. Such contact can be made by telephoning Armaguard directly, e-mailing Armaguard or by writing to Armaguard at the address provided.

Special arrangements will be made for persons with disabilities or specific needs, if appropriate.

## **Accountability**

Armaguard promotes a culture of accountability which includes every level of management accepting responsibility for effective complaints handling.

## **Fairness**

It is an objective of this Complaint Handling Policy to promote fairness to both the Complainant and Armaguard.

Armaguard will endeavour to ensure that Complainants will:

- be entitled to make a complaint.
- be notified of the Complaint Handling Process and the possible avenues of lodging and following up or further review of a complaint or dispute including using the Independent Expert dispute resolution process;
- be notified that Armaguard has followed its relevant procedures in regard to dispute resolution;
- be provided with all necessary material to support them in their complaint or enable them to present material to support their complaint;
- be notified of Armaguard's response and reasons for that response; and
- have the right to request confidentiality.

## **Adequacy of complaints handling resources**

### **Chief Executive Officer**

The CEO is responsible for ensuring there is adequate and competent complaints handling representatives for the Complaints Handling Policy to operate fairly and efficiently.

### **Complaints Manager's responsibility**

The Complaints Manager is responsible for:

- educating employees in the complaints handling process;
- ensuring complaints are recorded accurately and efficiently;
- identifying and reporting to Armaguard CEO any delays or other problems in handling complaints that may be caused by a lack of resources;

- recommending an appropriate course of action to remedy the situation, including seeking advice from external advisers;
- setting performance criteria;
- performance monitoring and evaluation;
- management reports on complaints handling performance;
- reporting on complaints handling;
- taking a proactive approach to complainant and staff feedback; and
- ensuring regular independent auditing of the complaints handling process

## **Organisational commitment**

### **Commitment by Armaguard**

Commitment to the Complaints Handling Policy by Armaguard is recognised by the Board as being an important aspect of an effective Competition and Consumer Law Compliance Program. This commitment is facilitated and fostered at all levels of Armaguard by:

- all relevant employees accepting responsibility for effective complaints handling;
- ensuring all relevant representatives are aware of and educated about Complaints Handling Policy procedures;
- ensuring that adequate resources are allocated to the Complaints Handling Policy; and
- implementing management systems and reporting procedures to ensure timely and effective complaints handling and monitoring.

## **Review**

### **Annual review**

Complaints handling practices will be reviewed at least annually by the Complaints Manager to ensure:

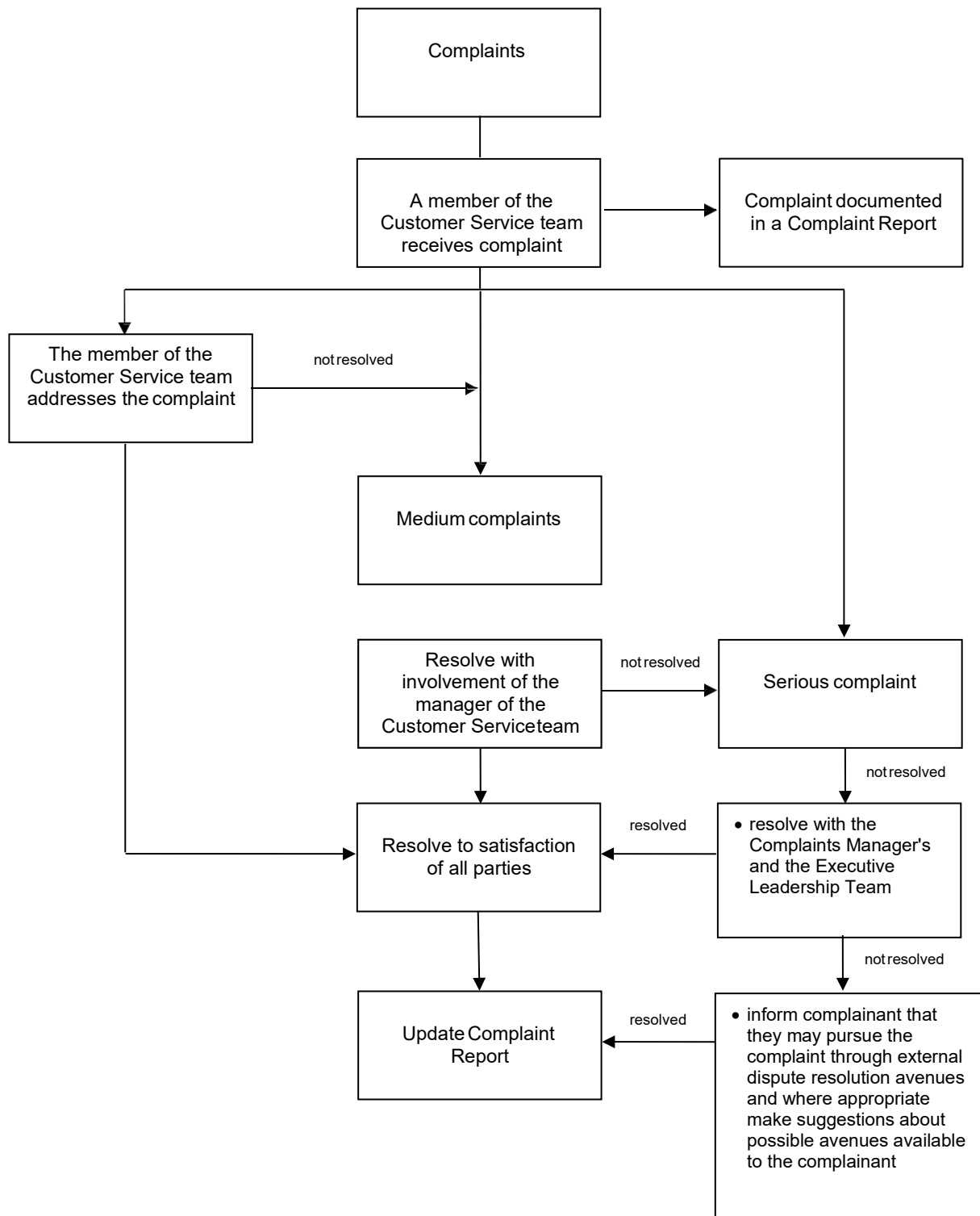
- the extent to which the procedures were adhered to throughout the review period;
- the currency of Complaint related documentation;
- the continued adequacy of resource allocation;
- any changes in business structures to take account of complaint handling procedures; and
- that the complaint handling procedures are consistent with the strategic direction of the business and adding value to customer attention and business improvement.

### **Review by Senior Management / the Board**

The results of the Annual review will be considered by Armaguard Senior Management / the Board and the effectiveness of the Complaints Handling Policy will be reviewed annually by Senior Management / the Board.

# Annexure A – Complaints Handling Framework

## Annexure to Dispute Resolution and complaints handling procedures



# Annexure B - Complaint Handling Process

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## Annexure to Dispute Resolution and complaints handling procedures

Linfox Armaguard Pty Ltd 's process for complaints from customers:

1. **Complaint received - Either orally or written. If orally, record complainant details and nature of complaint.**
2. **Report - Report complaint to a member of the Customer Service team.**
3. **Record** – The member of the Customer Service team records the details of the complaint in a Complaints Report.
4. **Time taken to resolve the complaint** - Complaints should be resolved as quickly as possible after receiving them. The Response Times set out in Annexure C should be used as a guide as to maximum timeframes. In all cases the complaint should be resolved in the shortest time possible.
5. **Resolve the Complaint**–
  - a. **Communicate - Contact should be made with the complainant within 48 hours of the complaint by the person allocated to handle the complaint. The customer should also be kept informed of the progress of the complaint at regular intervals, by the complaint handler.**
  - b. **Gather all information - Ensure adequate details of the complaint are gathered. If sufficient details are not at hand, ensure that complaint is discussed further with the complainant or gather relevant information from other sources.**
  - c. **Minimising disputes - Minimise the likelihood of a complaint developing into a dispute by keeping in mind the following when dealing with a complainant:**
    - i. listen to or understand the complainant's point of view.
    - ii. elicit all relevant information from the complainant;
    - iii. agree on a solution with the complainant;
    - iv. set a timetable for investigating the complaint (where required) and implementing a solution; and
    - v. take action on the agreed solution.
  - d. **Resolve the complaint with the following considerations in mind:**
    - i. try to retain the complainant as a customer and restore Linfox Armaguard Pty Ltd 's relationship with them;
    - ii. comply with any legal requirements;
    - iii. make commercially sensible decisions; and
    - iv. try to ensure that Linfox Armaguard Pty Ltd 's brand is not damaged.
6. **Write** – On resolution of the complaint the relevant member of the Customer Service team is to write to the complainant advising them of the resolution.
7. **Complaints resolution where complaint has not been resolved within 15 Business Days** - If the complaint has not been resolved within 15 Business Days (where a 'Business Day' is a day other than a Saturday or Sunday on which banks are open for business generally in New South Wales), then Linfox Armaguard Pty Ltd must advise the complainant that the following options are available:
  - a. A senior executive of each party may be elected, who the parties will procure to endeavour to resolve the dispute at a meeting, within a further 10 Business Days (or such other period as may be agreed between the parties).
  - b. If the dispute is not resolved by the relevant senior executives of each party in accordance with 7a. above (inclusive of any extended time period), then the dispute may be submitted to the Independent Expert in accordance with the Undertaking. If a party escalates the dispute to the Independent Expert then the other party must engage with this process.
  - c. In the event that the parties do not seek to escalate the dispute to the Independent Expert, an external dispute resolution process may be pursued.
8. **Record all actions** – All actions taken in regard to the complaint must be recorded in the Complaint Report.

# Annexure C – Timeframes for Resolving Complaints

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## Annexure to Dispute Resolution and complaints handling procedures

### Customer Complaints

Milestone	Action
5 Business Days	Resolve all minor complaints within 5 Business Days of the complaint being made. For other, more complex complaints, provide a written response to the complainant within 5 Business Days of receipt of the complaint.
15 Business Days	Respond to more complex complaints within 15 Business Days of the complaint being made. If the complaint is not resolved within this timeframe, then advise complainants that either: a. a senior executive of each party may be elected to endeavour to resolve the dispute at a meeting; or b. they may wish to pursue their complaint through external dispute resolution avenues and where appropriate make suggestions about possible avenues available to the complainant.
16 - 25 Business Days	If the complaint is not able to be resolved using the Complaint Handling Process then a senior executive of each party may be elected, who the parties will procure to endeavour to resolve the dispute at a meeting, within a further 10 Business Days (or such other period as may be agreed between the parties).
25 + Business Days	If the dispute remains unresolved by the relevant senior executives of each party (inclusive of any extended time period by mutual agreement), then the dispute may be submitted to an Independent Expert in accordance with the Undertaking. If a party escalates the dispute to the Independent Expert then the other party must engage with this process.

# Annexure D – Complaints Report Template

## Annexure to complaints handling plan

Complaint number:			Date:			Time:		
Complaint handled by:								
Details of Complaint:								
Name:								
Address:				Telephone number: ( ) (work)				
				( ) (home)				
Nature of complaint:								
Product, service or business practice about which complaint is being made:								
How complaint was received:								
Estimated response time conveyed to complainant:								
Date of Resolution:								
Resolution time:						(Business Days)		