

# Complaints & Dispute Resolution Policy

(PPP010)



---

# Complaints & Dispute Resolution Policy

## 1 Policy Statement

This Complaint Handling & Dispute Resolution Policy aims to provide a structured framework within which such complaints & disputes may be resolved in a fair and equitable manner, and that will lead to solutions that are acceptable to all parties.

The purpose of this Policy is to outline a set of procedures to effectively, and fairly respond to complaints and disputes in a fair, equitable, professional & timely manner.

This Policy provides a process for handling and resolution of complaints and disputes between The Company, employees, customers, contractors, suppliers, and members of the public relating to any company activity.

The objectives of this Policy are to establish a process to:

- Record, action, and resolve complaints & disputes.
- Provide complainants, dissatisfied with a decision, a referral to an external process for resolution for their complaint.
- Review and monitor company performance against the procedures outlined in this Policy.

## 2 Definitions

### ***Complaint***

A complaint is an expression of dissatisfaction, made to the company, related to the company activities, operations, policies, employees where a response or resolution is explicitly expected.

### ***Complainant***

A party that makes a complaint or files a formal charge, for example, a member of the public, employee, customer, supplier, or contractor.

### ***Dispute***

Means an unresolved complaint. In other words, it is a matter that has been dealt with as a complaint under this Policy, but where the complainant is still not satisfied with the outcome.

### ***The Company / Company***

For the purposes of this document this term refers to Papilo & any of its subsidiaries.

### 3 Overview

The complaint and dispute resolution process at the company operates in two stages:

- An internal dispute resolution process under which the company will use its best efforts to resolve a complaint or dispute to the mutual satisfaction of the company and the complainant.
- Failing resolution, an external dispute resolution process under which the complainant, dissatisfied with the company's decision, can refer the complaint to the company's external dispute resolution officer / mediator or other external mediation body / service for resolution.

### 4 Effective & Efficient Complaint & Dispute Resolution

The company will adopt an effective and efficient complaint and dispute resolution process that:

- Is documented.
- Is communicated to employees, customers, suppliers, contractors, and members of the public (where appropriate).
- Has stated time limits for each stage of the process.
- Is reviewed annually.

### 5 Management Commitment

The Company Director's and the Senior Management Team are committed to the implementation of this Policy, as evidenced by;

- Ensuring the public, employees, suppliers, and contractors are aware of the Policy.
- Implementing management systems and reporting procedures to ensure timely and effective complaints handling and dispute resolution, and monitoring.

### 6 Complaint handling & dispute resolution

The company will appoint / designate an internal Complaint Handling & Dispute Resolution Coordinator who will be responsible for managing and coordinating the implementation of this Policy.

All complaints should be directed to the Complaint Handling & Dispute Resolution Coordinator.

### 7 Communication

This Policy is available electronically upon request.

Periodically (at least annually), the Complaint Handling & Dispute Resolution Coordinator must remind the abovementioned stakeholders about this Policy.

## 8 Internal resolutions of complaints & disputes

### *Procedures for receiving complaints.*

If a complaint is submitted to the company, the company:

- Must, if the complaint is verbal, either resolve it 'on the spot', or if that is not done, request the complainant to submit a written complaint to the Complaint Handling & Disputes Resolution Coordinator.
- Must, if the complaint is in writing, acknowledge in writing receipt of the complaint as soon as practicable and in any event within 14 days from receipt, and enclose a copy of this Policy for the complainant's information.
- Must ensure that the complaint receives proper consideration resulting in a determination by the Complaint Handling & Dispute Resolution Coordinator as the person designated by the company as appropriate to handle complaints.
- Must act in good faith in dealing with and resolving the complaint.
- Must investigate the complaint by
  - Seeking all relevant information from the complainant; and
  - Obtaining all relevant information from employees, contractors and suppliers.
- May in its discretion give any appropriate remedy to the complaint, including any of the following:
  - Information and explanation regarding the circumstances giving rise to the complaint.
  - An apology
  - Compensation for loss incurred by the complaint.
- Must communicate to the complainant in relation to the complaint as soon as practicable and in any event not more than 45 days after receipt by the company of the complaint:
  - The determination in relation to the complaint.
  - The remedies (if any) available to the complainant.
  - Information regarding any further avenue for complaint.

## 9 When a complaint will be treated as resolved by the company?

### *Written Complaints*

Where the complainant has been notified in writing of a decision and no response has been received, the complaint will be treated as resolved by the company.

### ***Verbal Complaints***

Will be treated as resolved by the company where:

- The complaint has been resolved to the complainant's satisfaction 'on the spot', or
- Where the complainant has been notified of a decision about a complaint and no response has been received.

## **10 Confidentiality**

The complaint handling & dispute resolution process will keep the complainant's identity private to guard against inconvenience or discrimination.

## **11 Sensitivity**

The company will treat each complaint separately and, on its merits, with integrity, compassion and understanding.

## **12 Recording of the complaint**

The Complaint Handling & Dispute Resolution Coordinator must ensure that a Complaints and Dispute Register is established, maintained and kept up-to-date.

The Register will be comprised of a copy of each Complaint Report.

At a minimum, the Register must include the following information about every complaint that is received:

- Date complaint is made.
- Nature of complaint / issue.
- Action taken to investigate the complaint.
- Date resolved.
- How resolved.

The Complaint & Dispute Resolution Coordinator must periodically review the Register to check that complaints are being handled appropriately, including in accordance with this Policy, and within the required timeframes.

The Complaints Register must also be tabled annually by the Company Directors within the management review.

### 13 Timetable for complaint handling

The company will attempt to resolve complaints and notify the complainant as soon as possible.

### 14 Annual review

The Complaint Handling & Dispute Resolution Coordinator is responsible for ensuring this Policy is adhered to.

Periodically (at least annually), the Complaint Handling & Dispute Resolution Coordinator will review this Policy and report the outcome of this review to the Company Directors.

### 15 If an Individual asks about the policy

If an individual asks for information about the Company's complaints handling & dispute resolution methods, employees must refer the request to the Complaint Handling & Dispute Resolution Coordinator as soon as possible. The Complaint Handling & Dispute Resolution Coordinator must ensure the individual is provided with a copy of this Policy within seven business days of the request.

### 16 If an Individual asks for assistance in formulating or lodging a complaint.

If an individual asks for assistance in the formulation and lodging of his/her complaint, employees must refer the request to the Complaint Handling & Dispute Resolution Coordinator as soon as possible. The Complaint Handling & Dispute Resolution Coordinator must ensure reasonable assistance is provided to the individual.

### 17 Where a Complaint is not Resolved to an Individual's Satisfaction

For each complaint that cannot be resolved to the complainant's satisfaction within the abovementioned 45 days, the Complaint Handling & Dispute Resolution Coordinator must inform the complainant in writing that they have the option to pursue resolution of their complaint with the company's external Dispute Resolution Officer / Mediator and provide details about how to access them.

### 18 External resolution & disputes

Failing resolution of a complaint through the company's dispute resolution process as outlined in the Policy, complainants can refer their complaint to an external mediation body service for resolution.

### 19 Director sign-off

<b>Name</b>	Paul Hodgkiss
<b>Position</b>	CEO
<b>Signature</b>	<i>Paul Hodgkiss</i>
<b>Date</b>	06/02/2024

# Document Control

Version	Version Date	Changes By	Version Notes
V1	08/02/2019	MK	Implement new policy
V2	15/06/2023	MK	Review following Palatine investment
V3	06/02/2024	MK	Updated with Papilo branding

---

---

