

Complaints Management Standard Operating Policy And Procedure

Purpose

This document sets out the procedure of Procure Group Pty Ltd (Procure) and its related businesses & entities, including PC Legal Pty Ltd, Procure Claims & Risk Pty Ltd, AHC Investigations Pty Ltd, and PC Ability Pty Ltd, in relation to the management of complaints and feedback.

Scope

This policy applies to all Employees and Contractors, as well as subsidiary company employees and contractors.

Procure has adopted the ISO 10002:2014 definition of 'complaint.' A 'complaint' is an expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.

An expression of dissatisfaction may relate to:

- a. customer service
- b. actions or decisions
- c. inaction or delay
- d. policy or procedures.

Complaints should be distinguished from:

- a. feedback where there no expectation of a response.
- b. an enquiry which amounts to a request for information.

Background

Procure takes pride in the high-quality service offered to customers. Having an open and accessible complaints process helps us to understand our customers and provides us with the opportunity to improve.

Complaints (as well as feedback and enquiries) may be provided via Procure's omni-channel customer service model. This means complaints may be received through a variety of sources including:

- a. Email signatures which link to Procure's website.
- b. Procure's website.
- c. Social Media (Linked In/Instagram) commentary .
- d. "Complaints & Feedback" email inbox: feedback@procaregroup.com.au.
- e. By telephone, email, letter or fax.
- f. In person.

Procure support vulnerable customers to make complaints by providing easy-to-find details on our website of:

- a. interpreting services

- b. teletypewriter services (TTYs)
information on our products that are translated into other languages other relevant
information for people with language barriers.

Management of Complaint

The way Procure handle complaints is critical to the success of Procure and what Procure does with the information can help us to continue to improve our services. Procure Employees and Contractors are expected to comply with all regulatory principles, requirements and Codes and to treat customers with empathy, discretion and patience.

Overriding all complaints handling procedures is the requirement to treat all complaints impartially, confidentially, holistically, equitably and with sensitivity. Employees and contractors must comply with anti-discrimination legislation and not discriminate against other people on any grounds (such as sex, marital status, pregnancy, age, race, ethnic or national origin, disability, sexual preference, sexual harassment, religion, or political belief).

Governance

Procure supports the recording and response to all complaints. Procure promotes accountability (“owning our mistakes”) to enable us to grow from them, and to promote trust in our stakeholder relationships.

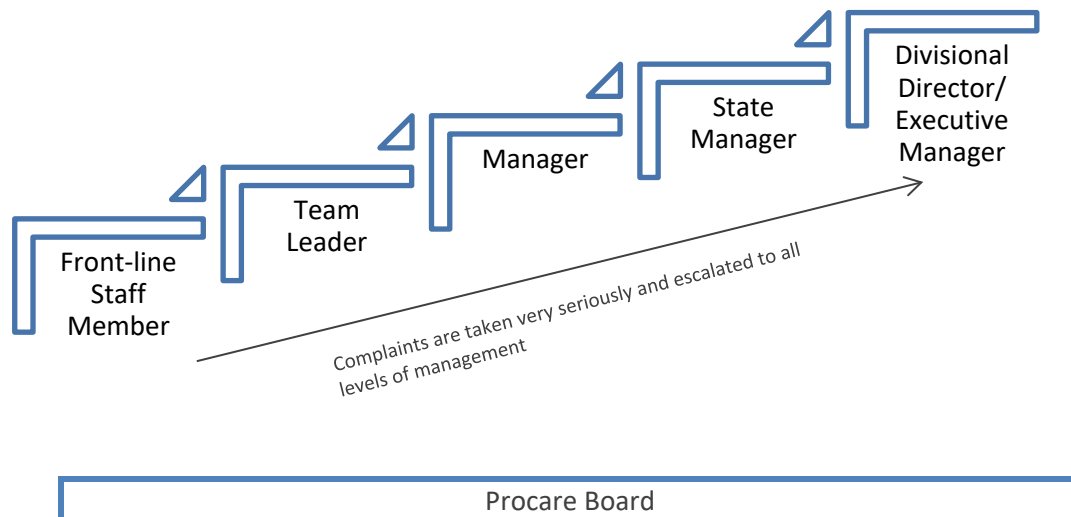
The Managing Directors and Operational Managers of each Division should ensure they have a documented processes for recording, performance monitoring, evaluating and reporting complaints. For Divisions that are Financial Service Licensees and for any Authorised Representatives that come within Procure’s Australian Financial Services the policies and procedures prescribed by legislation and regulation should be followed (see Claims Settlement and Handling Complaints Procedure). All Employees and Contractors are required to comply with their respective Division’s complaints process.

Who manages the complaint to resolution?

Where possible, complaints should be managed by front-line Employees or Contractors. Ideally the complaint will be managed by a person independent from the person against whom a complaint is made or the original decision maker. This may not always be possible depending on the size of the Division. The procedure must provide an option to escalate complaints for review. This may be internal or external.

For each Division, Management at all levels must be informed of all complaints, their status and outcomes. During the process of managing the complaint, all detail must be documented in the Divisional specific database.

The below is a sample complaint management and escalation process.



Prioritisation and Investigation

When a complaint is received, staff should assess and prioritise complaints according to the urgency and severity of the issues raised. Example of matters that should be prioritised include where:

- a. the complainant is experiencing domestic or financial abuse;
- b. the complainant has a serious or terminal illness; or
- c. a delay in addressing the complaint could adversely affect the complainant's basic living conditions.

Complaints must be investigated objectively, by reviewing the facts and gaining feedback from all relevant parties.

What information to Provide

Divisional processes should ensure that:

- a. complainants know what to expect from the claim process;
- b. complainants know what Procure will expect of them;
- c. complainants know how long it generally takes for a decision;
- d. complainants know why certain information is needed from them;
- e. complainants are regularly updated;
- f. complainants are informed of the reason for the outcome;
- g. complainants have a right of review; and
- h. any specific legislative and regulatory requirements are included.

Communicate the Outcome

Procure's broad principled approach to complaints management is to:

- a. Propose a rectification strategy with impacted parties, to ensure their concerns are addressed. Strategies for complaints are developed specific to the matter at hand. The strategy should address:
 - i. the steps taken to respond to the complaint;
 - ii. the outcome of complaint;
 - iii. the reason for decision;
 - iv. the remedy for resolution; and

- v. information about other remedies (e.g. the review process).
- b. Carefully monitor and manage the implementation of the agreed strategy
- c. Review the effectiveness of the strategy adopted, to ensure the issue has been addressed

A broad range of possible remedies are available and will depend on the facts of the case, the nature of the Division and Divisional authorities.

Depending on legislative and regulatory requirements, Divisions must consider whether the outcome must be in writing and provide the customer with information as to escalation processes. Consideration should also be given as to the need for a Deed of Release where the outcome involves a financial settlement.

Complaint escalation and notification requirements

Internal Dispute Resolution

If a customer is not satisfied at the conclusion of their complaint investigation, they may ask Procure to conduct an internal review. The complaint will be escalated to an impartial member of Senior Management be it the Procure Divisional Executive Manager, HR Manager or one of the Company Directors. A review of Procure's investigation will be conducted and the complainant will be contacted to discuss their findings.

If a customer is still not satisfied with Procure's findings, Procure senior management will advise the customer which external agencies have the jurisdiction to independently investigate the dispute.

Escalations must be recorded in the Division's Complaints Database.

External Dispute Resolution

Complaints may require escalation to external parties. Immediate notification to senior management is required in these circumstances. External party complaint escalation may arise from:

- a. Customer Service Level Agreements and Contracts;
- b. Customer accreditation requirements
- c. State and Federal law. For example:
 - i. serious complaints of a criminal nature may require notification to the relevant Workers Compensation Authority and the police;
 - ii. serious complaints of breach of Australian Financial Licensing requirements may require reporting to ASIC;
 - iii. for those customers who:
 - who have a complaint that relate to one of Procure's claims handling and settlement services; and
 - who are not satisfied with the outcome of the initial complaint and
 - whose complaint comes within the Australian Financial Complaints Authority (AFCA) Rules, customers may complain to AFCA. AFCA is an independent dispute resolution scheme approved by the Australian Securities Commission (ASIC). For its claims handling and settlement services, Procure is a member of AFCA and agrees to be bound by its determinations about a dispute.

AFCA is free to consumers. Complaints may be lodged with AFCA by:

Website: www.afca.org.au

Email: info@afca.org.au

Telephone: 1800 931 678 (free call)

In writing to: Australian Financial Complaints Authority, GPO Box 3,
Melbourne VIC 3001

Time limits may apply to complaints to AFCA. Customers may wish to consult the AFCA website or contact AFCA directly to find out if there is a time limit on lodging a complaint with AFCA.

Recording of Complaints

All complaints and their outcomes should be recorded in the Divisional Complaint Register.

Focus on Continuous Improvement

Information obtained from complaints will be used by Procure to improve system and processes, where appropriate.

Further Help

If you have any queries about our Policy please contact:

Email - info@procaregroup.com.au

Tel –