

Appendix D to Application for Retailer Authorisation

COMPLAINT AND DISPUTE RESOLUTION PROCEDURE

Background

Customers contact 3P Energy through various channels, written and oral, internal and external. Each time an issue is identified through a contact instance, it will be recorded and investigated. An issue identified through a contact may be a simple enquiry, or may indicate a complaint about an aspect of 3P Energy's products or services.

Purpose of this Manual

This Complaint and Dispute Resolution Process Manual (Manual) sets out 3P Energy's approved process for managing customer issues and complaints.

This Manual is intended to demonstrate 3P Energy's commitment to full legal and regulatory compliance in the area of complaints handling. It is a living document and will be further developed and adapted to suit the needs of the business, and compliance requirements.

Adherence to the principles and procedures outlined in this Manual is intended to promote customer satisfaction and loyalty, and to reduce costs to the business associated with handling customer complaints.

This Manual is managed by the Chairman of the Risk Management and Compliance Committee (RMCC). Changes require sign-off from the CEO or Legal Counsel or other person nominated by the CEO.

Training

A training module will be developed to train staff in approved Complaints Handling processes, supported by this Manual. Refresher training will be provided to ensure any changes are communicated and understood by all relevant staff. A register will be maintained by the RMCC Chair, showing training delivered in relation to this Manual.

Scope of this Manual

1. Planning and Design

Complaints handling officers are asked to read and become familiar with Australian Standard AS ISO 10002:2006 – Guidelines for complaints handling in organisations. A summary will be distributed

2. Approach to Issues Management

There are three guiding principles:

- (a) Respond to complaints quickly and courteously, without bias and with calmness, balance and common sense.
- (b) Always aim to resolve issues and complaints on the first contact.
- (c) Always follow up issues to ensure they are fully resolved to the customers' satisfaction.

3. Roles

The RMCC Chair has overall responsibility for complaint and dispute resolution.

The Customer Service Manager (or his or her delegate) is responsible for allocating customer issues to individual staff to be investigated and actioned, where required.

The Customer Service Manager and customer service staff are responsible for investigating and resolving customer issues.

All staff members within the business are required to assist the Customer Service team in their investigations, including providing information about a customer's account.

4. How complaints are received

- (a) By phone, generally to 3P Energy's call centre;
- (b) By email;
- (c) By letter;
- (d) By fax;
- (e) Directly by customers visiting 3P Energy's office.

5. What happens when complaints are received?

Details of complaints must be entered manually into the CRM system, where they are allocated an Issue Number and classification according to what the issue relates to. The CRM system will be used to track all complaints to ensure swift resolution and reporting.

Email inboxes must be checked by customer service staff at least once every hour.

Issues raised by telephone are entered by the staff member taking the call.

Where a telephone enquiry does not amount to a complaint, full details must still be entered in the CRM system.

Issues raised by letter are entered manually into the CRM system. All letters are filed with reference to the relevant customer.

Once a complaint has been recorded in the CRM system, it must be allocated to a customer service staff member to be investigated.

The CRM system has the functionality to flag all complaints. This will serve as a tool for monitoring compliance.

6. Each complaint must be assigned a classification, category and escalation level

Classification relates to the type of issue – for example, marketing or billing. Complaints must be classified as one or more of the following:

- (a) Either a sale (or contact) by an external sales channel or a sale (or contact) by the internal sales team.
- (b) Either a single, isolated incident or problem, or a trend indicating a systematic, recurring problem.
- (c) Either a door to door sale or a telemarketing sale.
- (d) A complaint or query concerning billing and payments.

A category for each complaint should be recorded as follows:

(a) Category 1 (simple complaints)

These complaints are relatively simple to resolve and should be responded to within 3 business days.

(b) Category 2 (medium level complaints)

These complaints may be more complex and should be responded to within 5 working days. Often these complaints require information from someone outside the Customer Service area.

(c) Category 3 (complex complaints)

These complaints are complicated to resolve. Within two days, a letter is sent advising that the complaint requires detailed investigation and providing a

timeframe within which a response will be provided. The response is then formulated and forwarded within that timeframe.

Escalation level relates to the “level” of the issue – starting with enquiry, and progressing to EWON RHL and higher. These strata enable tracking of repeated contacts – for example, an enquiry may escalate to a complaint, then to a second complaint, or possibly to EWON Level 1.

7. How issues are managed after being entered in the CRM system

The customer staff member to whom an issue has been allocated will undertake an investigation into the matter. This will include making inquiries of other staff members where necessary. Notes are to be recorded in the CRM system, showing what inquiries are made and what responses are received.

Issues raised in relation to external sales or marketing conduct must be reported to the relevant sales channel manager, who must investigate and provide a written explanation as directed by the CEO or Sales Manager.

In the case of any issue or complaint which indicates a possible code or regulatory breach, the CSO must immediately notify the Compliance Manager, who will determine whether it is necessary to advise any regulatory bodies. If in doubt as to whether the issue is a compliance matter, obtain advice from the Compliance Manager.

Any complaint involving any allegation of misleading or deceptive conduct, unconscionable conduct or coercive marketing behaviour on the part of a sales person or customer service staff member must be treated as serious and must be reported immediately reported to the Customer Service Manager, the RMCC Chair and/or Legal Counsel.

- (a) Not only should this conduct be reported to the Customer Service Manager and the Compliance Manager but also the Call Centre Manager should be made aware of this immediately.
- (b) Any trend indicating a possible systemic problem must be reported immediately to the Customer Service Manager and the Compliance Manager.

8. Where no actual complaint is made

This refers to cases where, in the course of contract verification or in the course of customer follow-up following receipt of a cancellation request, a response from a customer indicates that the customer is not aware that he or she has signed a contract or that a contract has been entered into.

In such a case, the customer’s comment or reaction is to be treated as a complaint of a serious nature.

This must be reported immediately to the Customer Service Manager and the RMCC Chair and/or Legal Counsel.

9. How to distinguish complaints from other customer contacts

A “Complaint” is an expression of grievance about an action, a failure to act or a proposed action or solution.

A complaint that is not resolved is regarded as a dispute, and is escalated.

If there any doubt over whether a customer contact is a complaint or an enquiry, always treat the contact as a complaint.

Call Centre staff will receive training on how to distinguish a complaint from an inquiry.

Each cancellation request (whether in writing or not) must be checked to see if it should be treated as a complaint. If there is any doubt, then it must be treated it as a complaint.

Complaints that may have a significant impact on the Company or have the potential to cause reputational damage to the business must be reported to the CEO and the RMCC Chair and/or Legal Counsel.

10. How complaints are acknowledged

For complaints received by email, an auto response is sent to the sender acknowledging the enquiry, and advising the sender that he or she will be contacted by phone or further email within two working days to resolve the complaints or query. If a telephone number is available, the customer must be phoned on the same day as the email is received.

For complaints received by mail, if a telephone number is provided, the customer must be phoned on the same day as the mail is received.

11. Complaints that must be investigated

The following complaints must be treated as serious. They must be reported immediately to the RMCC Chair, who will thoroughly investigate them and make a report to the next meeting of the Risk Management and Compliance Committee:

- (a) Any complaint involving any allegation of misleading or deceptive conduct on the part of a sales representative;
- (b) Any complaint involving any form of unconscionable conduct or indicating a breach of 3P Energy’s Vulnerable Customer Policy;

- (c) Any complaints indicating coercive marketing behaviour;
- (d) Any trend indicating a possible systemic problem;
- (e) Any complaint that may have a significant impact on the Company.

12. Escalation process – dispute resolution process

- (a) If the complaint cannot be resolved by the Call Centre Operator, it is initially escalated to the Call Centre team leader.
- (b) If it is still unresolved after a further two working days, the complaint is escalated to the Customer Service Officer.
- (c) If it remains unresolved, the customer must be advised of EWON's or EWON's contact details, and the customer's right to make a complaint to them. A complaint to the EWON or EWON is free.
- (d) The customer is sent a copy of 3P Energy's Dispute resolution policy.

13. Privacy issues.

- (a) All employees all receive Privacy training;
- (b) All employees must comply with the Australian Privacy Principles;
- (c) Any complaint involving an apparent breach of the privacy principles must be reported to the RMCC Chair and/or Legal Counsel.

14. Communication

A summary of this Manual is made readily available to customers upon request.

15. Monitoring of the Process

Regular monitoring and/or auditing of the complaints handling process, the resources required and the data to be collected should be undertaken by the RMCC Chair.

16. Living Document

- (a) This Manual is intended to serve as a "living" document.
- (b) The Customer Service Manager is responsible for reviewing this Manual on a regular basis with the RMCC Chair and/or Legal Counsel and will update it as required.

- (c) Customer Service staff will attend a monthly staff meeting to discuss any Customer Service issues and any updates needed in this Manual or in procedures.

- (d) As 3P Energy enters into new markets, different requirements may apply to sales in those markets. These requirements may necessitate changes to the Manual.