

COMPLAINTS AND DISPUTE RESOLUTION POLICY



Purpose

This policy is intended to ensure that we handle complaints fairly, efficiently and effectively.

Our complaint management system is intended to:

- Enable us to respond to issues raised by customers making complaints in a timely and cost-effective way
- Boost customer confidence in our processes
- Provide information that can be used by us to deliver quality improvements in our products, services, staff and complaint handling.

This policy provides guidance to our staff and people who wish to make a complaint on the key principles and concepts of our complaint management system.

Scope

This policy applies to Tas Gas Holdings Pty Ltd and its subsidiary companies. It applies to all staff receiving or managing complaints from customers regarding our products and services.

Commitment

This company expects staff at all levels to be committed to fair, effective and efficient complaint handling. The following outlines the nature of the commitment expected from staff and the way that commitment should be implemented.

CEO of Tas Gas

Promote a culture that values complaints and their effective resolution.

- Report publicly on Tas Gas's complaint handling.
- Provide adequate support and direction to key staff responsible for handling complaints.
- Regularly review reports about complaint trends and issues arising from complaints.
- Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly.
- Encourage staff to make recommendations for system improvements.
- Recognise and reward good complaint handling by staff.
- Support recommendations for product, service, staff and complaint handling improvements arising from the analysis of complaint data.

Manager responsible for complaint handling

Establish and manage our complaint management system.

- Provide regular reports to the CEO on issues arising from complaint handling work.
- Ensure recommendations arising out of complaint

data analysis are canvassed with the CEO and implemented where appropriate.

- Recruit, train and empower staff to resolve complaints promptly and in accordance with Tas Gas's policies and procedures.
- Encourage staff managing complaints to provide suggestions on ways to improve the organisation's complaint management system.
- Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly.
- Recognise and reward good complaint handling by staff.

Staff whose duties include complaint handling

Demonstrate exemplary complaint handling practices.

- Treat all people with respect, including people who make complaints.
- Assist people to make a complaint, if needed.
- Comply with this policy and its associated procedures.
- Keep informed about best practice in complaint handling.
- Provide feedback to management on issues arising from complaints.
- Provide suggestions to management on ways to improve the organisation's complaints management system.
- Implement changes arising from individual complaints and from the analysis of complaint data as directed by management.

All staff

Understand and comply with Tas Gas's complaint handling practices.

- Treat all people with respect, including people who make complaints.
- Be aware of Tas Gas's complaint handling policies and procedures.
- Assist people who wish to make complaints to access the Tas Gas's complaints process.
- Be alert to complaints and assist staff handling complaints resolve matters promptly.
- Provide feedback to management on issues arising from complaints.
- Implement changes arising from individual complaints and from the analysis and evaluation of complaint data as directed by management.

Definitions

Tas Gas: Tas Gas Holdings Pty Ltd includes, but is not limited to, the following subsidiaries:

- Tas Gas Holdings Pty Ltd (TGH)

- Gas Holdings Tasmania (GHT)
- Tas Gas Networks Pty Ltd (TGN)
- Tas Gas Retail Pty Ltd (TGR)
- Gas Networks Victoria Pty Ltd (GNV)
- Gas Pipeline Victoria PTY Ltd (GPV)

Complaint: Expression of dissatisfaction made to or about us, our products, services, staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.

Complaint Management System: All policies, procedures, practices, staff, hardware and software used by us in the management of complaints.

Policy: A statement of instruction that sets out how we should fulfil our vision, mission and goals.

Procedure: A statement or instruction that sets out how our policies will be implemented and by whom.

Guiding Principles

STEP 1: FACILITATE COMPLAINTS

STEP 2: RESPOND TO COMPLAINTS

STEP 3: MANAGE THE PARTIES TO A COMPLAINT

Facilitate Complaints

People focus

We are committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures, products and complaint handling.

Any concerns raised in feedback or complaints will be dealt with within a reasonable time frame.

People making complaints will be:

- Provided with information about our complaint handling process
- Provided with multiple and accessible ways to make complaints
- Listened to, treated with respect by staff and actively involved in the complaint process where possible and appropriate
- Provided with reasons for our decisions/s and any options for redress or review

No detriment to people making complaints

We will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

Anonymous complaints

We accept anonymous complaints and will carry out an investigation of the issues raised where there is enough information provided.

Accessibility

Information about how to make a complaint must be easily accessible for a customer, including information on this policy.

We will also provide customers with information on their right to contact the Energy & Water Ombudsman in their state at any time for independent advice and information, as well as to complain to the Ombudsman if they are dissatisfied with our handling of their complaint or dispute. The Ombudsman's contact details are on our website.

Customers who are deaf, or have a hearing impairment may contact us to make a complaint via the National Relay Service, the following details are also published on our website and on customer bills:

- TTY users phone [133 677](tel:133677) then ask for [1800 750 750](tel:1800750750)
- Speak and Listen users phone [1300 555 727](tel:1300555727) then ask for [1800 750 750](tel:1800750750)
- Internet relay users [connect to the NRS](#) then ask for [1800 750 750](tel:1800750750)
- SMS Relay text [0423 677 767](tel:0423677767)

For customers who wish to use an interpreter service to make a complaint to us can call TIS National on [131 450](tel:131450). This number is also published on our website and on customer bills.

No charge

Complaining to us is free.

Respond to Complaints

First call resolution

Where possible, complaints will be resolved at first contact with Tas Gas.

Responsiveness

We will promptly acknowledge receipt of complaints.

We will assess and prioritise complaints in accordance with the urgency and/or seriousness of the issues raised. If a matter poses an immediate risk to safety or security the response will be immediate and will be escalated appropriately.

We are committed to managing people's expectations, and will inform them as soon as possible of the following:

- Complaints process
- Expected time frames for our actions
- Progress of the complaint and reasons for any delay
- Their likely involvement in the process
- Possible or likely outcome of their complaint

Objectivity and fairness

We will address each complaint with integrity and in an equitable, objective and unbiased manner.

We will ensure that the person handling a complaint is different from any staff member whose conduct or service is being complained about.

Conflicts of interests, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how

a complaint was managed will be conducted by a person other than the original decision maker.

Responding flexibly

Our staff are empowered to resolve complaints promptly and with as little formality as possible. We will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.

We will assess each complaint on its merits and involve people making complaints and/or their representative in the process as much as possible.

Confidentiality

We will protect the identity of people making complaints where this is practical and appropriate. Personal information that identifies individuals will only be disclosed or used by Tas Gas as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

Manage the Parties of a Complaint

Complaints involving multiple organisations

Where a complaint involves multiple organisations, we will work with the other organisation/s, where possible, to ensure that communication with the person making a complaint and/or their representative is clear and coordinated.

Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint.

Where a complaint involves multiple areas within our organisation, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.

Where our services are contracted out, we expect contracted service providers to have an accessible and comprehensive complaint management system. We take complaints not only about the actions of our staff but also the actions of service providers.

Complaints involving multiple parties

When similar complaints are made by related parties we will try to arrange to communicate with a single representative of the group.

Empowerment of staff

All staff managing complaints are empowered to implement our complaint management system as relevant to their role and responsibilities.

Staff are encouraged to provide feedback on the effectiveness and efficiency of all aspects of our complaint management system.

Managing unreasonable conduct by people making complaints

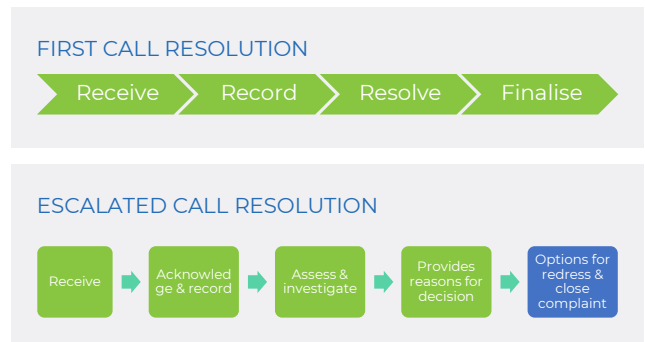
We are committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time our success depends on:

- Our ability to do our work and perform our functions in the most effective and efficient way possible
- The health, safety and security of our staff

- Our ability to allocate our resources fairly across all the complaints we receive

When people behave unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work. As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same in accordance with this policy.

Complaint Management System



Introduction

When responding to complaints, staff should act in accordance with our complaint handling procedures as well as any other internal documents providing guidance on the management of complaints.

Staff should also consider any relevant legislation and/or regulations when responding to complaints and feedback.

The five key stages in our complaint management system are set out below.

Receipt of complaints

We will record the complaint and its supporting information. We will also assign a unique identifier to the complaint file.

The record of the complaint will document:

- The contact information of the person making the complaint
- Issues raised by the person making the complaint and the outcome/s they want
- Any other relevant information
- Any additional support the person making the complaint requires

Acknowledgement of complaints

We will acknowledge receipt of each complaint promptly and preferably within 5 working days.

Consideration will be given to the most appropriate medium (e.g. email, letter) for communicating with the person making the complaint.

Initial assessment and addressing of complaints

Initial assessment

After acknowledging receipt of the complaint, we will confirm whether the issue/s raised in the complaint is/are within our control. We will also consider the outcome/s sought by the person making a complaint and, where there

is more than one issue raised, determine whether each issue needs to be separately addressed.

When determining how a complaint will be managed, we will consider the following:

- How serious, complicated or urgent the complaint is.
- Whether the complaint raises concerns about people's health and safety.
- How the person making the complaint is being affected.
- The risks involved if resolution of the complaint is delayed.
- Whether a resolution requires the involvement of other organisations.

Addressing Complaints

After assessing the complaint, we will consider how to manage it, which may include the following:

Give the person making the complaint information or an explanation.

- Gather information from the product, person or area that the complaint is about
- Investigate the claims made in the complaint

We will keep the person making the complaint up to date on our progress, particularly if there are any delays. We will also communicate the outcome of the complaint using the most appropriate medium. The actions we decide to take will be tailored to each case and will take into account any statutory requirements for providing reasons for decisions.

Following consideration of the complaint and any investigation into the issues raised, we will contact the person making the complaint and advise them:

- The outcome of the complaint and any action we took
- The reason/s for our decision
- The remedy or resolution/s that we have proposed or put in place
- Any options for review that may be available to the complainant, such as an internal review, or external review to the independent Ombudsman.

Closing the complaint, record keeping, redress and review

We will keep comprehensive records about:

- How we manage the complaint
- The outcome/s of the complaint including whether it or any aspect of it was substantiated, and recommendations made to address problems identified and any decisions made on those recommendations
- Any outstanding actions that need to be followed up

We will ensure that outcomes are properly implemented, monitored and reported to the complaint handling manager and/or senior management.

Alternative avenues for dealing with complaints

We will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis.

Accountability and Learning

Analysis and Evaluation of Complaints

We will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis.

Regular reports will be run on:

- The number of complaints received
- The outcome of complaints, including matters resolved at the frontline
- Issues arising from complaints
- Systemic issues identified
- The number of requests we receive for internal and/or external review of our complaint handling

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service and make improvements.

Both reports and their analysis will be provided to the CEO and senior management for review.

Monitoring of the complaint management system

We will continually monitor our complaint management system to:

- Ensure its effectiveness in responding to and resolving complaints
- Identify and correct deficiencies in the operation of the system

Monitoring may include the use of audits, complaint satisfaction surveys and online listening tools and alerts.

Continuous improvement

We are committed to improving the effectiveness and efficiency of our complaint management system. To this end, we will:

- Support the making and appropriate resolution of complaints
- Implement best practices in complaint handling
- Recognise and reward exemplary complaint handling by staff
- Regularly review the complaints management system and complaint data
- Implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.

COMPLAINTS AND DISPUTE RESOLUTION PROCEDURE (TGR)



1. GENERAL

1.1 Scope

This procedure applies to Tas Gas Retail (TGR), a subsidiary of Tas Gas Holdings Pty Ltd.

1.2 Objective

The objective of this procedure is to ensure TGR and its Customer Service Representatives (CSRs) adheres to:

- The principals set out in the Complaints and Dispute Resolution Policy; and
- Manage a customer's dissatisfaction with services in a way that keeps the interests of the customer at the forefront of TGR's operations.

To assist CSRs, this Procedure sets out the methodology for handling, recording, tracking, communicating, and resolving complaints in a timely manner.

1.3 Definitions

Tas Gas: Tas Gas Holdings Pty Ltd includes, but is not limited to, the following subsidiaries:

- Tas Gas Holdings Pty Ltd (TGH)
- Tas Gas Networks Pty Ltd (TGN)
- Tas Gas Retail Pty Ltd (TGR)
- Gas Networks Victoria Pty Ltd (GNV)
- Gas Pipeline Victoria PTY Ltd (GPV)

CSRs: Customer Service Representatives

HSE: Health Safety and Environment

Gentrack: Gentrack Velocity, TGR's customer billing and account management system

GM: General Manager

2. THE COMPLAINT PROCESS

2.1 Initial Registration

CSRs are the main point of contact for complaints via phone, letter or email. When a CSR receives a complaint¹ through any of these means, they will follow the below steps:

1. Establish whether the complaint relates to a service provided by TGR or TGN (if TGN, follow below steps as well as refer to 2.5).
2. Once established, record complaint against the customer's account in Gentrack through creating a complaint record.

Note: if a person making the complaint is not a TGR customer, the CSR will still create a complaint record in the TGR internal account and complete the following details as prompted:

- Complaint Source
 - Complaint Type
 - Complaint About
 - Billing Complaint Type (if a Billing complaint)
 - Full Issue Description (please complete as much detail as possible)
 - Attachments (attach copies of any documentation, etc)
 - FINISH
3. If the complaint **can** be resolved to the customer's satisfaction during the initial contact, can close the complaint,

Note: If as part of the resolution the customer requests confirmation in writing, a Resolution Confirmation Letter will be sent in line with the customer's chosen method of communication and saved to the customer's account (i.e. if complaint is received via email, response to be sent by email, etc).

4. If the complaint **cannot** be resolved, will immediately record details of the next steps required in the Gentrack record, as well as track any actions already taken.

¹ A complaint is defined as being:
"An expression of dissatisfaction with a specific action or service of an agency, including the failure by an agency to comply with its public service charter or mission."

Note. Please see the Good Practice Guide, the Victorian Ombudsman's Guide to Complaint Handling for Victorian Public-Sector Agencies and Australian Standard AS/NZS

10002-2014 - Guidelines for complaints management in organisations. This guide is based on the current Australian Standard. This guide helps educate and embed how best we can manage and support our valued customers with complaints.

2.2 Complaint Monitoring

Once the complaint has been recorded against the customer's account, it will be visible to all TGR staff including the Team Leaders, Customer Service & Operations Manager and GM Retail.

The CSR will notify either the Customer Service Team Leader or Billing Team Leader (whichever is applicable) advising a complaint has been received.

The CSR will monitor progress of the complaint via the customer's account, using notes and follow up dates.

2.3 Updating the Complaint

Any updates to the complaint will be recorded in the complaint record so that progress of the complaint can be monitored and escalation can take place if necessary.

If letters or other documentation are provided in relation to the complaint, copies will be saved to the complaint record in the customer's account.

2.4 Completion within 5 Working Days

TGR aims to have a completion turnaround of 5 business days unless elevated to the relevant Ombudsman.

All efforts should be made to ensure complaints are resolved to the customer's satisfaction within 5 business days, and without the need for the complainant to escalate the issue to the relevant Ombudsman.

Once the complaint is resolved, the complaint record in the customer's account will be updated with the close out date, and the open service order will also be closed. Details of all actions and the resolution will be recorded in the complaint record in the customer's account.

2.5 Closing Complaint

Before a complaint is closed, TGR will ensure the outcome/s of the complaint is recorded in the complaint record in the customer's account, including:

- Whether the complaint or any aspect of it was substantiated;
- Recommendations made to address problems;
- Any decisions made on recommendations; and
- Outstanding actions that need to be followed up

Where there are outstanding actions that need to be followed up, these will be diarised in the TGR calendar and assigned to a member of the TGR Management Team for oversight.

2.6 Complaint by TGR customer about TGN

If a complaint is received from a TGR customer about TGN's operations, the complaint will still be registered in the customer's TGR record and TGR will ensure it is resolved (following steps in 2.1 above). A CSR will also follow the below steps:

1. Advise customer the complaint is in relation to TGN and obtain the customer's consent to provide TGN with their name, contact details and details of the complaint (including convenient times to be

contacted about the complaint). The consent will be recorded as part of the complaint description.

2. Once customer's consent is obtained, record consent in complaint record in customer's account and pass the above details onto TGN.
3. Advise customer TGN will respond directly when it is practicable for them to do so.
4. If customer states they want to contact TGN directly, advise them to contact the TGN Health Safety & Environment (HSE) team via the relevant Tasmanian or Victorian email address or by phoning 03 6336 9350, or alternatively offer to transfer the complainant to the TGN HSE team for action.
5. Always forward any details relating to the complaint to:
 - o complaintstgn@tasgas.com.au for Tasmanian complaints; or
 - o gnvcomplaints@tasgas.com.au for Victorian complaints

2.7 Complaint by person who is not TGR customer

If a complaint is received from a person that is not a customer of TGR, the complaint will still be registered in the TGR internal account (following steps in 2.1 above). A CSR will also follow the below steps:

1. If the complainant is a gas consumer, advise them to contact their gas retailer to register their complaint.
2. If the complainant is not a gas consumer, but they have a complaint in relation to the gas network, advise them to contact the TGN HSE team via the relevant Tasmanian or Victorian email address at 2.5 above or by phoning 03 6336 9350, or alternatively offer to transfer the complainant to the TGN HSE team for action.

2.8 Ombudsman Cases

If a customer's case is elevated to the relevant Ombudsman, the Ombudsman will formally contact TGR. This is usually via an initial telephone call to either the GM Retail or the TGN HSE team informing them of the complaint and requesting information. Depending on the nature of the complaint, this may be followed subsequently with further communication from the Ombudsman requesting information or setting out actions to be taken.

As with any complaint, the complaint will still be registered in the customer's TGR record and TGR will ensure it is resolved (follow steps in 2.1 above). A CSR will also ensure the following steps are undertaken:

1. If the customer is a TGR customer, inform the TGR Management Team, together with the relevant action to be undertaken.
2. If the customer is a TGR customer, record any details received from the Ombudsman in the customer's account.
3. Respond to all requests for information from the Ombudsman as a priority, and provide information either directly to the Ombudsman via email within

1 business day of receiving the request, or via the Manager HSE if requested to do so.

4. Add all subsequent information received in relation to the complaint to the complaint record in the customer's account so that the TGR Management Team are able to track progress of the complaint.
5. Once the TGR Management Team receives notification from the Ombudsman that the complaint has been resolved to the Ombudsman's satisfaction, notify all relevant parties the case can be closed.
3. If the close out date for the complaint is greater than 5 business days from the date of receipt of the complaint, record the reasons in the complaint details.

2.9 Ombudsman Cases

Any correspondence addressed to customers or other parties in relation to a complaint will first be approved by the Customer Services & Operations Manager before sent, and saved to the complaint record in the customer's account.

2.10 Outcome

TGR will follow the *Complaints and Dispute Resolution Policy* and *Complaints Procedure Flow Chart*, ensuring that valued customers, team, and business partners are carefully managed and kept informed of the progress of their complaint.

Success will be measured by resolving all complaints within 5 business days of receipt of the complaint and without the need to involve external mediators.