

## COMPLAINTS HANDLING POLICY

### CBS TRADES PTY LTD

#### 1 INTRODUCTION

##### 1.1 About this Policy

This Complaints Handling Policy (“**this Policy**”) is the official complaints handling policy of **CBS TRADES PTY LTD ACN 693 097 353 (ABN XX)** and any of its wholly owned subsidiaries (hereafter collectively referred to as the “**CBS**” or “**we**”, “**us**” or “**our**”) concerning complaints by customers and other persons concerning our services and commercial dealings.

##### 1.2 Objectives and purposes of Complaints Handling Policy.

- (a) CBS is committed to delivering high quality services to those who deal with it. We are committed to understanding and responding to the needs and concerns of our customers and clients.
- (b) The aim of this Policy is to provide guidance as to the manner in which CBS receive and handle complaints made to it in respect of its business activities and dealings with its staff, customers and other parties.
- (c) The objective of this Policy is to assist us in dealing with and resolving complaints in an efficient, effective and professional manner.

##### 1.3 Background

In creating this Policy, CBS have sought to ensure that our procedures accord with relevant legal requirements and best practice. In particular, this Policy has been created to satisfy the requirements of AS ISO 10002-2022 – Guidelines for complaint management in organizations.

##### 1.4 What is a Complaint?

- (a) AS ISO 10002-2022, defines a complaint as follows:  
*“An expression of dissatisfaction made to or about an organization, 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.”*
- (b) We adopt that definition of “complaint” for the purposes of this Policy.
- (c) Any person or entity who is dissatisfied with a service provided by us for any reason, may contact us to complain. A complaint may be made in writing or verbally.
- (d) Certain types of “complaints” may be by way of negative feedback, which may not require a resolution or any response. Whilst we acknowledge this type of feedback can be useful and valuable, this Policy does not apply to such feedback as such feedback does not fall under the definition of a complaint as set out above.

#### 2 GUIDING PRINCIPLES FOR EFFECTIVE HANDLING OF COMPLAINTS

CBS abides by the guiding principles as set out in section 5 of AS ISO 10002-2022 for effective handling of complaints.

The guiding principles set out in section 5 of AS ISO 10002-2022 are as follows:

Enabling Complaints	
People focus	Everybody has the right to complain.  The organization should adopt a people-focused and proactive approach to seeking and receiving feedback and complaints. It should demonstrate a strong commitment to addressing any issues raised within a reasonable timeframe.

	<p>The organization should seek clarification on whether feedback or general concern is intended to be handled as a complaint, where appropriate.</p> <p>People making complaints should be treated with respect.</p> <p>The organization should actively involve the complainant in the complaints process as far as practicable and appropriate in the circumstances.</p> <p>Complaints lodged without contact information, where it appears the complainant wants to retain anonymity, should be exempt from active involvement. Organisations should only address the content of such complaints where sufficient information enables them to do so.</p>
<b>Ensuring no detriment to complainant</b>	The organization should take all reasonable steps to ensure that complainants are not adversely affected because of a complaint made by them or on their behalf.
<b>Visibility and transparency</b>	The organization should ensure that information about how and where a complaint can be made to or about the organization is well-publicized.
<b>Accessibility</b>	<p>The organization should ensure that its complaint management system is accessible to everyone, including people who may require assistance.</p> <p>The organization should provide support to people to make a complaint if needed.</p> <p>The organization should acknowledge that a person or organization can request that another person or organization assist or represent them to make and progress their complaint.</p> <p>The organization should accept complaints from authorized representatives of complainants. Information about the various ways complaints can be made and the types of support available people should be easily accessible to the public.</p>
<b>No charges</b>	A complainant should not be charged a fee to complain.
<b>Managing complaints</b>	
<b>Responsiveness</b>	<p>The organization should promptly acknowledge each complaint received, within three working days of receiving it if possible.</p> <p>The organization should assess complaints and give appropriate priority in accordance with the urgency of the issues raised.</p> <p>Complainants should be advised, as soon as practicable, where the organization is unable to deal with either part or all of their complaint.</p> <p>The organization should deal with complaints efficiently. Where set timeframes cannot be met, internal escalation systems should be used.</p> <p>The organization should actively manage the expectations of complainants.</p> <p>This includes advising complainants about — (a) the complaint process; (b) the expected timeframes for its actions; (c) their likely involvement in the process; and (d) the possible or likely outcome of their complaint, where practicable.</p>
<b>Impartiality and fairness</b>	<p>Each complaint should be managed in an impartial and unbiased manner.</p> <p>Conflicting interests should not interfere with, or be reasonably perceived to interfere with the management and outcome of complaints. For example, the organization's complaint management</p>

	<p>system should provide avenues for review of the complaint outcome by people other than the original decision maker.</p> <p>Where appropriate, the organization should defer actions that may have significant detrimental impact on the complainant until their complaint (or review) has been finalized.</p>
<b>Equity</b>	<p>All complaints should be addressed in an equitable manner and in accordance with the organization's complaint management policy.</p> <p>The organization's complaint management policy should address the issue of how to manage the conduct of complainants who act unreasonably.</p>
<b>Privacy and disclosure</b>	<p>Personally identifiable information about any individual should only be used in compliance with all relevant privacy laws and ethical obligations when managing a complaint.</p>
<b>Communication</b>	<p>To facilitate early resolution, frontline staff and staff handling complaints should have access to clear and simple information to inform their effective communication with complainants.</p>
<b>Managing the parties</b>	
<b>Conduct of parties</b>	<p>The organization should implement policies or guidelines, or both, that make clear the behaviour expected of both its staff and complainants.</p>
<b>Work health and safety</b>	<p>The organization should develop, adopt and implement appropriate policies, procedures and practices to ensure the health and safety of its staff involved in complaint management, including identity protection if needed.</p>
<b>Complaint involving multiple parties</b>	<p>When a complaint involves multiple organizations, consideration should be given to options for coordinating communication with the complainant. Subject to privacy and confidentiality obligations, communication and information exchange between the organizations should be pre-arranged, where practicable and appropriate, to facilitate investigation and response to a complaint.</p> <p>Where a complaint involves multiple areas within the organization, responsibility for communicating with the complainant should be coordinated between the areas involved</p>
<b>Empowerment of staff</b>	<p>The organization should ensure that staff are properly empowered to implement its complaint management system as relevant to their role.</p> <p>The organization should encourage staff feedback as being a valuable source of insight into problems with the organization, its services or the complaint management system.</p>
<b>Accountability, learning and prevention</b>	
<b>Accountability</b>	<p>The organization should ensure that accountability for the operation of its complaint management system is clear.</p>
<b>Continuous improvement</b>	<p>Responding to and learning from complaints should be an essential part of an organization's commitment to continual quality improvement.</p> <p>The organization should have systems and processes in place to collect and act on staff feedback about complaints, given it is a valuable source of insight. This includes risk management policies and whistleblower policies.</p>
<b>Prevention of ongoing disputes</b>	<p>The organization should develop and implement systems that minimize the possibility of complaints escalating into ongoing disputes.</p>

## COMPLAINTS HANDLING

### 3.1 How may a complaint be made

- (a) Where possible, complaints should be made in writing so that the details of the complaint are clear and complete and so that we may more effectively deal with the complaint.
- (b) Complaints should be directed to our Complaints Officer:

#### The Complaints Officer – CBS

Telephone: **+61 7 2104 2445**

Email: [support@contactcbs.com](mailto:support@contactcbs.com)

- (c) Complaints relating to privacy of information or data breaches may be directed to our Privacy Officer at:

#### The Privacy Officer – CBS

Telephone: **+61 7 2104 2445**

Email: [support@contactcbs.com](mailto:support@contactcbs.com)

### 3.2 Information to be provided when making a complaint

When making a complaint, please provide the following information:

- (a) your name, the organization you are from (if applicable), your position and contact details;
- (b) your relationship with us;
- (c) the name of any contact person at the company or business division within CBS you dealt with;
- (d) details of the complaint (including when the conduct giving rise to the complaint occurred);
- (e) details of any persons or persons of the company or business division within CBS involved (if applicable); and
- (f) copies of any documentation that supports the complaint.

### 3.3 Help with making a complaint

If you require any assistance in formulating or lodging a complaint, please contact the Complaints Officer at the contact details set out above.

### 3.4 Resolution time frames

- (a) We will **acknowledge receipt** of a complaint **within three (3) working days** of receipt.
- (b) We will endeavor to **respond in full** to the complaint **within thirty (30) days** of receiving the complaint. However, this may not be possible in all instances. Where time to deal with a complaint will exceed thirty (30) days, we will contact the complainant to inform of the reasons for the delay and indicate when we expect to be in a position to complete our review of the complaint.
- (c) Generally, the more information a complainant provides in a complaint, the less time will likely be required for us to review and respond to the complaint.
- (d) We appreciate that our response to a complaint may not resolve the complaint for the complainant, and that resolution may take longer. We will work with the complainant to progress the complaint in an efficient and time effective manner.

- (e) If it is possible for us to escalate a complaint in order to meet resolution time lines and deal with the complaint more efficiently, we will do so.

### **3.5 Your rights in the complaints process**

Complainants have the right to enquire as to the status of their complaint by contacting the Complaints Officer or any other staff member or representative of CBS who has been identified to the complainant as handling the complaint.

### **3.6 Responding to a complaint**

- (a) Once we have reviewed a complaint, we will assess the complaint, including considering its severity, likely impact on the organization and the complainant, and if any legal requirements apply, for example:
  - (i) complaints of a workplace health and safety nature necessitate consideration of our obligations for workplace health and safety;
  - (ii) complaints that may be subject to insurance coverage necessitate consideration of the insurer's requirements;
- (b) If we feel that the complaint cannot be dealt with effectively by the person to whom the complaint is made or allocated, that person will escalate the complaint to their supervisor, and or the Complaints Officer or Privacy Officer (as applicable).
- (c) Once we have completed our assessment of the complaint, we will provide the complainant with a written response.
- (d) If we decide to dismiss a complaint, we will provide reasons.
- (e) Our initial written response may state that we have elected to open a formal investigation into the subject matter of the complaint, or that the complaint relates to a matter which is already under formal investigation, in which case a formal response will be provided on conclusion of the investigation.

### **3.7 Internal review**

- (a) If the complainant is dissatisfied with our response, the complainant has a right to ask for the response to be re-considered by the Complaints Officer.
- (b) Such a request should be made in writing to the Complaints Officer and forwarded by post or email to the addresses provided above.
- (c) Complaints handled by the Complaints Officer include a comprehensive review of the complaint and review and approval of the final response by our managing director or chief executive officer.

### **3.8 External review**

- (a) If a complainant remains dissatisfied with the manner in which the complaint has been handled following internal review by the Complaints Officer, the complainant may have a right to refer the complaint to some other external resolution body.
- (b) Complaints relating to privacy of information may be referred to the Office of the Australian Information Commissioner at [www.oiac.gov.au](http://www.oiac.gov.au).

## **4 QUALITY ASSURANCE**

### **4.1 Periodic investigation**

Complaints will be analyzed by our Complaints Officer at regular intervals to identify any recurring or systemic problems. If any such problems are identified, we will consider what actions we need to take to address any such problems and improve our internal systems.

### **4.2 Review of procedures**

Our complaints handling process will be reviewed periodically in order to enhance our delivery of efficient and effective outcomes in respect of complaints received.

### **4.3 Training**

We carry out complaints handling training at all levels of our organization to ensure complaints are addressed in conformity with this Policy.

## 5 TREATMENT OF COMPLAINT INFORMATION

### 5.1 Records of complaints

We will create a record of complaints we receive, this record may include information such as:

- (a) the complainant's contact information;
- (b) the original complaint received and any associated information, including the issues raised by the complainant and the outcome sought;
- (c) any other information obtained or support requirements utilized to properly assess and respond to the matter including expert reports and third party evidence obtained; and
- (d) our response and other information concerning the outcome of the complaint, including its accepted resolution (if resolved), any grounds for dismissal of the complaint (if dismissed) or any referral to an external dispute resolution system (if applicable).

### 5.2 Confidentiality and privacy of complaint information

- (a) Generally speaking, we will (1) collect (2) hold (3) disclose and (4) de-identify or destroy all information concerning a complaint including records of complaints in accordance with our Privacy Policy available at: [URL](#)
- (b) Some complaints may necessitate a higher degree of confidentiality than that set out in our Privacy Policy, in which case we will apply our judgement as to the additional privacy measures, including internal communication barriers, that should be applied consistent with (1) any fiduciary duties we may have (2) any additional lawful requirements applicable to the complaint and (3) good practice. We will also have regard to any confidentiality request made by the complainant.

## 6 BREACHES OF PRIVACY

### 6.1 Complaints concerning privacy and data handling

If the nature of your complaint relates to the privacy of your information with CBS we invite you to view our Privacy Policy which contains additional provisions regarding how we maintain privacy of data within our organization and how you may have access to or correct information we have collected concerning you. Our Privacy Policy is available at: [URL](#)

### 6.2 Data Breach Response Plan

If we become aware that we have suffered unauthorized access, misuse or misplacement of our client's information, rest assured that we have a data breach response plan in place to address data breaches that includes compliance with the steps necessary under the *Privacy Act 1988* (Cth). Concerns and enquiries regarding possible data breaches may be directed to the Privacy Officer as outlined in clause 3.1(c).

## 7 INTERNAL COMPLAINTS AND WHISTLEBLOWER POLICY

### 7.1 Internal complaints to be addressed under HR policy

This Policy relates to complaints concerning CBSs' services and its engagements with third parties. Complaints concerning human resources matters or internal matters should be addressed consistent with our HR policy available to staff internally.

### 7.2 Whistleblowers

- (a) Persons making a complaint in the nature of a whistleblower complaint by an 'eligible whistleblower' as defined in the *Corporations Act 2001* (Cth) have additional protections under that Act.
- (b) Generally, an eligible whistleblower is a person who is a current or former employee, person who has supplied goods and services or other associate of CBS or a spouse, relative or dependent of such person. Eligible whistleblowers do not generally include competitors, customers and clients.
- (c) A whistleblower complaint relates to misconduct or an improper state of affairs or circumstances including an allegation of breach of (1) the Corporations Act (2) financial sector laws enforced by ASIC or APRA (3) an offence against another

Commonwealth law that is punishable by imprisonment for a period of 12 months; or (4) represents a danger to the public or the financial system.

- (d) CBS will observe the protections available to eligible whistleblowers under the Corporations Act, which include:
  - (i) keeping the complainant's information and information leading to their identification confidential.
  - (ii) not taking administrative or disciplinary action against the complainant; and
  - (iii) not take any other action to cause the complainant detriment.
- (e) More information concerning whistleblower action may be from time to time contained in our internal policies available to staff members.