

Complaints & Feedback Policy

McMillan Shakespeare Group of Companies

MMSG Corporate Responsibility



Table of Contents

1. Overview	3
2. Complaint Definition.....	3
3. Customer Definition	3
4. Key Principles of the Complaints and Feedback process	3
5. Lodging a Complaint.....	4
6. Complaint Resolution Process Map	5
7. Receiving Complaints	6
8. Complaint Resolution at First Point of Contact.....	6
9. Investigating the Complaint – Information Collection	6
10. Responding to Complaints	7
11. Complaint Handling Escalation Process.....	8
12. Customer Advocate	8
13. External Disputes Resolution	8
14. Complaints about Employees.....	9
15. File Maintenance	9
16. Transparency and access	9
17. Dealing with the media	9
18. Policy Review	9
19. Litigation	9
20. Reporting	10

Complaints and Feedback Policy

1. Introduction

This policy sets out the McMillan Shakespeare Group (MMSG) of companies' Complaints & Feedback policy. MMSG provides accessible, fair and independent dispute resolution for its customers. In the provision of this service, MMSG is aware of the importance of a clear and transparent Complaints and Feedback process. We want to ensure all complaints about our products and services are managed with a high level of fairness in accordance with our organisation's values.

This is a free service to all MMSG's customers.

This policy is aligned with ASIC's Regulatory Guides 139 (RG139) and 165 (RG 165) and the Australian Standard – Customer Satisfaction – Guidelines for complaints handling in organisations (AS ISO 10002 – 2006).

2. Complaint Definition

AS ISO 10002 – 2006 defines a complaint as follows:

'An expression of dissatisfaction made to an organisation, related to its products or services, or the complaints handling process itself, where a response is explicitly or implicitly expected'.

In line with the above, MMSG will consider any expressed dissatisfaction about its products or services, where a response is explicitly or implicitly expected, as a complaint.

MMSG takes complaints about its products and service very seriously. This policy is designed to ensure MMSG provides the highest levels of customer service in relation to its complaints handling processes.

3. Customer Definition

For the purpose of this policy, a customer is defined as everyone to whom MMSG provides a service, irrespective of the brand providing the service. This definition of customer includes all individuals with whom we have direct dealings and also includes companies that deal with MMSG or any of its subsidiaries.

The Complaint Resolution Process Map detailed under section 6 below, is a generic process map which is designed to cover all brands within MMSG.

4. Key Principles of the Complaints and Feedback process

This Policy is underpinned by the following guiding principles:

- Fairness, transparency and respect
- Commitment to providing an integrated complaints handling process
- Recognising and respecting our customers' right to lodge a complaint
- The complaining party must know who is handling their complaint
- All complaints are acknowledged and responded to promptly and sensitively
- All customers are advised the date by when they will receive a response to their complaint
- All complaints are dealt with in a manner that is effective, fair to all parties and provides a clear outcome
- All complaints are recorded to enable review of individual cases, the identification of trends and to review service efficiency
- Recording complaints in a prompt, accurate and accessible manner to enable the identification of customer dissatisfaction
- Complaint recording also provides the ability to highlight and correct the cause of complaints.

5. Lodging a Complaint

If a customer wishes to lodge a complaint, or if they have an issue which requires clarification, they should call MMSG directly on the number shown below. In the majority of cases, complaints are quickly resolved over the telephone at the time of the initial call.

However, if a complaint remains unresolved after speaking to an employee, MMSG provides a number of options for customers to lodge a complaint. Complaints may be lodged:

Via website: www.mmsg.com.au
Via email: resolution@mmsg.com.au
Via mail to: McMillan Shakespeare Group
Locked Bag 18, Collins Street East
Melbourne VIC 8003
Via phone: (03) 9097 3000
Via facsimile: 1300 733 444

For Maxxia customers, complaints may be lodged:

Via website: www.maxxia.com.au
Via email: info@maxxia.com.au
Via mail to: Maxxia
Locked Bag 18, Collins Street East
Melbourne VIC 8003
Via phone: 1300 123 123
Via facsimile: 1300 733 444

For RemServ customers, complaints may be lodged:

Via website: www.RemServ.com.au
Via email: remserv@remserv.com.au
Via mail to: RemServ
Level 13, 60 Edward Street,
Brisbane Qld 4000

Via phone: 1300 303 940
Via facsimile: 1300 301 866

For Interleasing customers, complaints may be lodged:

Via website: www.interleasing.com.au
Via email: enquiries@interleasing.com.au
Via mail to: Interleasing Australia
Level 4, 2-4 Lyonpark Road
North Ryde NSW 2113
Via phone: (02) 8899 4899
Via facsimile: (02) 8899 4888

For Holden Leasing customers, complaints may be lodged:

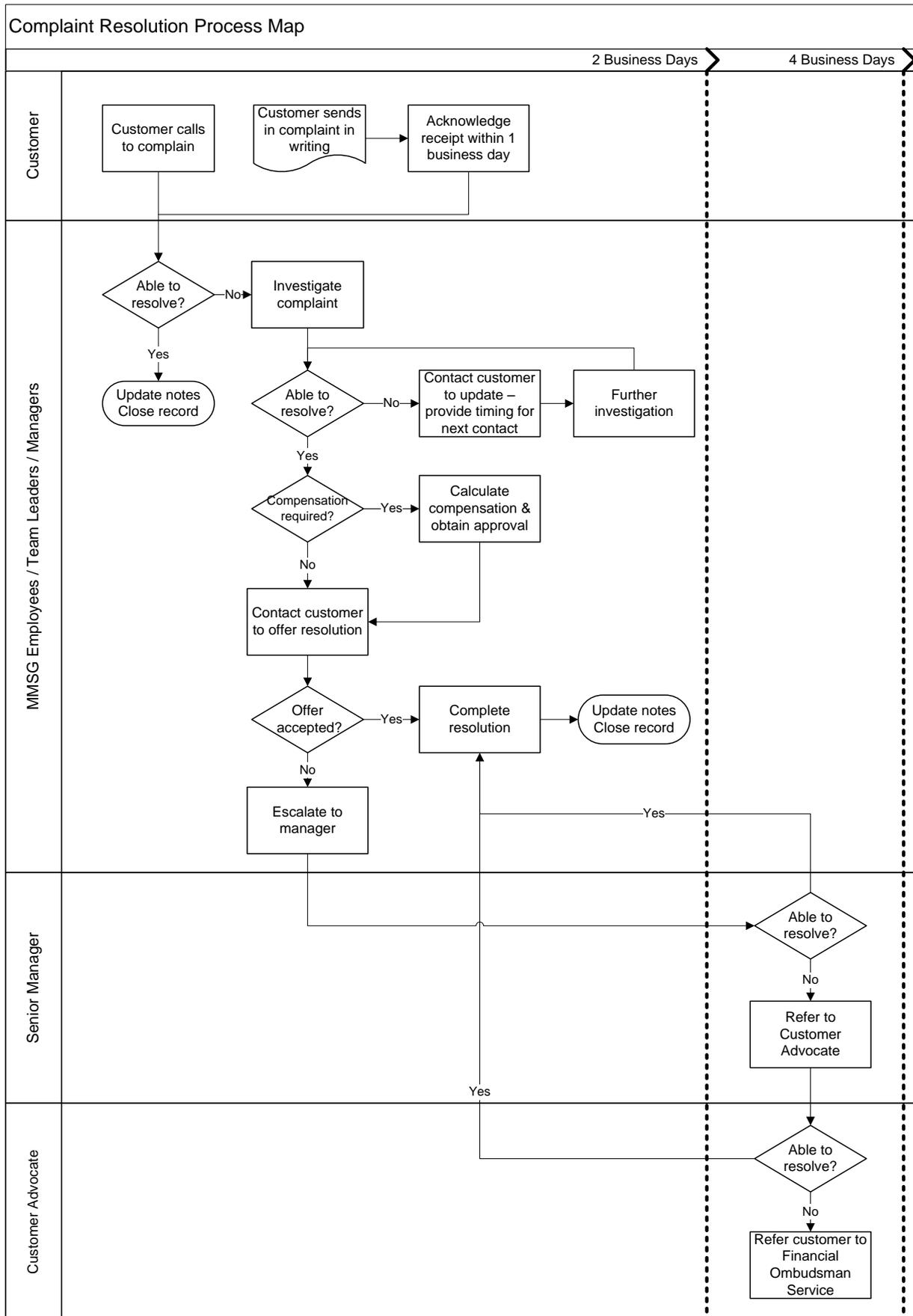
Via website: www.holdenleasing.com.au
Via email: enquiries@holdenleasing.com.au
Via mail to: Holden Leasing Australia
Level 4, 2-4 Lyonpark Road
North Ryde NSW 2113
Via phone: (02) 8899 4800
Via facsimile: (02) 8899 4888

Interpreting Service

For all MMSG companies, a telephone interpreting service is available for our customers.

Telephone Interpreting Service:
Phone: 131 450

6. Complaint Resolution Process Map



7. Receiving Complaints

Complaints may be received in person, over the telephone or in writing. Employees at all levels must record and deal with complaints and know what action they can take to resolve them. Complaints that cannot be resolved at the first point of contact (i.e. over the phone) require an acknowledgement either verbally or in writing (i.e. via email) that they will receive a response within 2 business days.

7.1 When complaints are received verbally, employees should:

- provide the complainant with an explanation of the events that occurred, if known at the time
- comprehensively record the conversation and concerns, along with all necessary details (names, date issue first arose etc) into the company's computer system as soon as it is obtained (even if the complaint is resolved)
- identify the issues for resolution, including the key concerns raised by the complainant
- if any of the issues are unclear, clarify them with the complainant directly
- know when to escalate the complaint to a team leader or manager
- advise the complainant of the complaints handling process, and
- commence handling the complaint if appropriate.

7.2 When complaints are received in writing, employees should:

- acknowledge receipt of the complaint by contacting the customer within 1 business day of receipt, and
- follow the points above for when complaints are received verbally.

8. Complaint Resolution at First Point of Contact

Ideally, most complaints will be dealt with directly and quickly at the point where the problem arose. Escalation of complaints may be avoided where employees have the ability to resolve complaints at first contact.

Often, no changes to procedures are required as many complaints involve an acknowledgment of the complainant's perspective, an explanation of events and validation of the complainant's satisfaction with the explanation.

8.1 Complaints should be referred to a team leader if they:

- need action that is beyond the responsibility of the employee, or
- remain unresolved.

8.2 Complaints should be referred to a manager if:

- they involve a complaint regarding an employee
- they remain unresolved by the team leader
- they involve serious consequences, or
- requested to do so by the complainant.

9. Investigating the Complaint – Information Collection

All complaints require, to a greater or lesser degree, an investigation in order to determine what has happened and what course of action is needed in response. Consideration is required by the person managing the complaint to determine:

- what information is required and where to source it
- how it should be collected (system's review, phone call, document review etc.)
- how it should be communicated to the complainant (verbally, via email, letter etc.).

10. Responding to Complaints

Once the information has been analysed, the person managing the complaint should be in a position to action a response. Actions taken to resolve a complaint must be based on the evidence, address the issues raised, and be informed by the principles of fairness, respect and transparency. If there is any doubt over the appropriate action in regards to a complaint, the person managing the complaint is to use the Complaints Handling Escalation Process outlined in Section 11 below.

Options for appropriate action may include, but are not limited to:

- explaining the process employed by MMSG which led to the complaint
- training/education of employee
- education of complainant
- further complaint investigation
- offering an apology, or
- ongoing monitoring of an issue.

It is imperative that complainants are kept fully informed at all times regarding the action that is being taken in relation to resolving their complaint and the time by when they will next be contacted by a MMSG employee.

Employees must ensure that the outcome of the complaint investigation is clearly communicated to the complainant. Final responses may be in the form of a letter, an email or via telephone. The final response must be factually correct and:

- address each of the points raised by the complainant with a full explanation, or if that is not currently possible, provide the reasons why a detailed response is not available and advise the complainant that a further response will be provided within 2 business days
- give specific details about the investigation i.e. sources of information, what has been discovered to date etc
- ensure the complainant has been provided with the contact details of the employee who is responsible for handling their complaint
- include details of further action available to the complainant, if appropriate.

10.1 Timeframes

When responding to complaints, employees must ensure that the following timeframes are adhered to at all times:

(a) *acknowledgment of complaints:*

- via telephone: immediate
- in writing (either email or letter): within 1 business day of receipt.

(b) *resolution of complaint:*

- MMSG aims to resolve all complaints within 2 business days
- if the matter cannot be resolved within 2 business days and further investigation is required, the complainant must receive a response within a further 2 business days. The only exception to this is when information has been requested from a customer or when the matter has been referred to the Customer Advocate for resolution.
- a final response will be provided to the complainant no later than 30 days after the complaint was first lodged. This time line does not recommence when the customer provides new or additional material.

11. Complaint Handling Escalation Process

A complaint is referred to the next level of management when the matter is outside a employee's ability to finalise, or when it remains unresolved.

The escalation process is as follows:

- immediate team leader or manager who may escalate to a senior manager (where appropriate), and
- a senior manager may escalate to the Customer Advocate.

In cases where the complainant does not feel comfortable in making a complaint to those directly involved, the appropriate team leader/manager should speak to the complainant. If the complainant does not wish to speak to, or correspond with a team leader/manager, the complainant should be referred to a senior manager.

As a last resort, the complainant should be referred to the Customer Advocate if the senior manager is unable to resolve the matter, or if the complainant requests to do so.

Wherever possible, complaints should be dealt with by an employee from the team involved. However, for more serious matters or those with potential broader implications, a manager should be notified and participate in the resolution.

Complaints about employees must be immediately escalated to a manager. See section 14 below 'Complaints about Employees'.

12. Customer Advocate

The Customer Advocate position operates with the full authority of the Chief Executive Officer and sits independently of Operations. Unresolved complaints are referred to the Customer Advocate by senior operational managers.

If the Customer Advocate is unable to resolve the dispute, the customer will be referred to the Financial Ombudsman Service (FOS) for a final resolution (where FOS has jurisdiction). The Customer Advocate will make submissions on behalf of the company to FOS if necessary.

The Customer Advocate will conduct audits of the complaints handling process throughout the organisation to ensure compliance with this Policy.

The Customer Advocate's contact details are:

- via phone: (03) 9097 3758
- via email: CustomerAdvocate@mmsg.com.au
- via fax: 1300 733 444, or
- in writing to: Customer Advocate
McMillan Shakespeare Group
Locked Bag 18, Collins Street East
Melbourne VIC 8003

13. External Disputes Resolution

The McMillan Shakespeare Group of companies is a member of the Financial Ombudsman Service.

In those instances where a customer does not accept the final resolution offered by MMSG in attempting to resolve a dispute, the customer is to be referred to the Financial Ombudsman Service (FOS) (where FOS has jurisdiction).

The final resolution is defined as the settlement offer made to the customer by the Customer Advocate.

The Financial Ombudsman Service's contact details are:

- via website: www.fos.org.au
- via telephone: 1300 780 808
- via facsimile: (03) 9613 6399

- via email: feedback@fos.org.au or
- in writing to: Financial Ombudsman Service, GPO Box 3, MELBOURNE VIC 3001

FOS does not have jurisdiction to address company to company disputes, or to handle disputes involving New Zealand based customers.

This section of the policy does not apply to companies dealing with Maxxia, RemServ, Interleasing, Holden Leasing or MSL where the dispute concerns a contractual matter between the companies. These disputes are addressed by specific contractual clauses relating to both companies' dispute resolution obligations. If a contractual matter is not resolved within 14 days, it needs to be referred to the Managing Director or his nominee of the relevant company.

For customers residing in New Zealand, the Disputes Tribunal of the Ministry for Consumer Affairs provides an external disputes resolution service.

14. Complaints about Employees

All complaints about employees are to be forwarded to the named employee's manager without delay.

Investigation of a complaint about an employee is only to be conducted by a manager or senior manager.

15. File Maintenance

The employee managing the complaint will be responsible for maintaining the appropriate complaint records and correspondence.

At each contact with the company, the complainant will be provided with a system generated reference number which identifies the details of the contact.

16. Transparency and access

16.1 Internally

This Policy will be:

- placed on the intranet where all employees can access it at any time
- part of the induction process for new employees commencing work with MMSG, and
- periodically updated where appropriate (refer section 17 Policy Review below).

16.2 Externally

An external Policy will be:

- placed on the MMSG website
- available upon request.

17. Dealing with the media

When a grievance or complaint has been communicated to a media organisation and possibly to the public, the matter should be brought to the attention of the Group Executive Customer & Public Relations.

18. Policy Review

The Policy will be reviewed every 12 months and any proposed changes are to be directed to the Customer Advocate for consideration.

19. Litigation

When a dispute involves the threat of litigation, it should immediately be brought to the attention of the Customer Advocate. The Customer Advocate will then review the matter with the General Counsel.

20. Reporting

Complaint statistics will be provided to the Board, the Executive and the Risk Management Committee on a quarterly basis.

Reports will include specific information to identify and record systemic issues and will form part of the company's continuous improvement program.

<i>Policy Owner</i>	<i>Customer Advocate</i>
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