

**CONTINENTAL GROUP  
COMPLAINTS HANDLING PROCEDURE**

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## 1. Introduction

### 1.1 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 people making complaints in a timely and cost-effective way
- boost public confidence in our administrative process, and
- provide information that can be used by us to deliver quality improvements in our products [where relevant], 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. It specifies the minimum requirements and standards that are to be adopted by the Group in dealing with complaints.

### 1.2 Scope

This policy applies to all staff receiving or managing complaints from the public made to or about us, regarding our products [where relevant], services, staff and complaint handling.

Staff grievances, code of conduct issues, and complaints are addressed through distinct procedures.

### 1.3 Objectives

- Improve customer confidence, satisfaction and loyalty in respect of market & market participants
- Dealing customer dissatisfaction in a swift, effective and fair manner
- Provide a clear escalation process regarding complaints received both internally and externally
- Use complaints to enhance procedures and correct procedural or policy deficiencies
- To allow customers to report instances where parties are not complying with the Law / regulations

### 1.4 Organizational Commitment

The Continental Group is dedicated to ensuring fair, effective, and efficient complaint resolution. Staff at all levels are expected to uphold the following principles:

- All complaints will be handled with strict confidentiality.
- The Group will address customer complaints promptly and impartially.
- The Group will take all reasonable measures to investigate and respond to complaints thoroughly.
- The Group will strive to consistently deliver exceptional service to its clients.

## 2. Terms and Definitions

Unless the context requires otherwise, all terms included in this Procedure shall have the meaning given to them herein. Where the context requires, (a) words importing the singular shall include the plural and vice versa and (b) words importing the masculine shall include the feminine and vice versa.

### 2.1 Interpretation of Terms

#### 2.1.1 Continental Group [CFS Group]

Continental is the business name used by various companies within the Continental Group, collectively referred to hereafter as the Group or the Company.

- Continental Insurance Brokers LLC (Registration Number: 088) is regulated by the Central Bank of the UAE and licensed to conduct insurance brokerage activities. Registered head office is located at office No 505, Level 5, Bay square 11, Dubai, UAE
- Continental Financial Services LLC (Registration Numbers: 608026, 2020000091) is regulated by the Securities and Commodities Authority (SCA), UAE and regulated to conduct business activities of 'Financial Analysis and Financial Consultation' and 'Promotion'. Registered head office is located at No 503, Level 5, Bay Square 11. Dubai, UAE.

#### 2.1.2 Complaint

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

Any expression of dissatisfaction by a customer, potential customer or other business partner or any regulatory body made to the company either directly or indirectly which is related to a product or service provided by the company or which is related to an employee of the company or which is related to a service provided by an intermediary acting on behalf of the company or provided by another business partner of the company shall be considered as a complaint.

A complaint covered by this Policy can be distinguished from:

- staff grievances
- public interest disclosures made by our staff
- code of conduct complaints
- responses to requests for feedback about the standard of our service provision
- service requests, and
- requests for information

#### 2.1.3 Complainant

A Complainant is a natural or legal person who is presumed to be eligible to have a complaint considered by the Company and who has already lodged a complaint.

A complaint received by a complainant shall include:

- the Complainant's name and surname;
- the Complainant's contact details
- the affected transaction details, if applicable;

- the date that the issue arose and
- a description of the issue.

#### **2.1.4 Complaint Management System**

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

#### **2.1.5 Dispute**

An unresolved complaint escalated either within or outside of our organization.

#### **2.1.6 Feedback**

Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about us, about our products [where relevant], services or complaint handling where a response is not explicitly or implicitly expected or legally required.

#### **2.1.7 Service Request**

- requests for approval
- requests for action
- routine inquiries about the organization's business
- requests for the provision of services and assistance
- requests for explanation of policies, procedures and decisions.

#### **2.1.8 Grievance**

A clear, formal written statement by an individual staff member about another staff member or a work-related problem.

#### **2.1.9 Policy**

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

#### **2.1.10 Procedure**

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

### 3. Guiding Principles



#### 3.1 Facilitate Complaints

##### 3.1.1 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 multiples and accessible ways to make complaints
- listened to, treated with respect by staff and actively involved in the complaint process where possible and appropriate, and
- provided with reasons for our decision/s and any options for redress or review.

##### 3.1.2 No Detriment to Complainant

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.

##### 3.1.3 Anonymous Complaints

We accept anonymous complaints and will investigate the issues raised, provided there is sufficient information to do so. However, if a complainant chooses to submit their complaint anonymously, we will be unable to offer a direct response or provide updates on the investigation's outcome. While anonymity safeguards the complainant's privacy, it may restrict our ability to gather additional details or deliver a tailored resolution.

##### 3.1.4 Accessibility

We will ensure that information about how and where complaints may be made to or about us is well publicized. We will ensure that our systems to manage complaints are easily understood and accessible to everyone, particularly people who may require assistance.

If a person prefers or needs another person or organization to assist or represent them in the making and/ or resolution of their complaint, we will communicate with them through their representative if this is their wish. Anyone may represent a person wishing to make a complaint with their consent (e.g. advocate, family member, legal or community representative, member of Parliament, another organization).

### **3.1.5 No Charge**

Submitting a complaint to us is completely free of charge. We believe everyone should have access to a fair and transparent process without any financial burden.

## **3.2 Respond to Complaints**

### **3.2.1 Early Resolution**

Where possible, complaints will be resolved at first contact with CFS Group.

### **3.2.2 Responsiveness**

We will promptly acknowledge receipt of complaints.

We will assess and prioritize complaints in accordance with the urgency and/or seriousness of the issues raised.

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

- the complaints process
- the expected time frames for our actions
- the progress of the complaint and reasons for any delay
- their likely involvement in the process, and
- the possible or likely outcome of their complaint.

We will advise people as soon as possible when we are unable to deal with any part of their complaint and provide advice about where such issues and/or complaints may be directed (if known and appropriate).

We will also advise people as soon as possible when we are unable to meet our time frames for responding to their complaint and the reason for our delay.

### **3.2.3 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.

### **3.2.4 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 far as possible.

### **3.2.5 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 the CFS Group as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

## **3.3 Manage the Parties to a Complaint**

### **3.3.1 Complaints Involving Multiple Agencies**

Where a complaint involves multiple organizations, we will work with the other organization/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 organization, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.

We take complaints not only about the actions of our staff but also the actions of service providers.

### **3.3.2 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.

### **3.3.3 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.

### **3.3.4 Managing Unreasonable Conduct by Complainants**

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, and
- 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.

## 4. Complaint Management System



### 4.1 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 key stages in our complaint management system are set out below.

### 4.2 Receipt of Complaints

Upon receipt of the complaint the department which has received the complaint or responsible for handling it shall record the complaint in the complaints register maintained by the Group/relevant entity. The records must be segregated by jurisdiction, entity, and regulatory body to ensure proper categorization and compliance. A unique identifier will also be assigned to each complaint file.

The record of the complaint will document:

- Contact information of the complainant
- Issues raised by the complainant and their desired outcome(s)
- Any other relevant information
- Any additional support the complainant may require

The ownership of a complaint must be assigned to a named individual or a specific jobholder title. Departments cannot hold ownership of complaints. The complaint owner must be a clearly identifiable staff member.

Complaints must not be handled by the person who is the subject of the complaint, nor by a department that is involved in the matter of the complaint.

### 4.3 Acknowledgement of Complaints

We will acknowledge the complaint and provide the complainant with the contact details of the individual responsible for handling it, along with key details of the company's complaint-handling procedures. We will aim to acknowledge receipt of each complaint promptly as soon as possible and ideally within two [2]<sup>1</sup> working days of receiving it.

The most appropriate medium for communication (e.g., email, letter) will be considered when responding to the complainant.

[1 - CBUAE Rulebook> All LFI's> Market Conduct & Consumer Protection> Consumer Protection Standards Article 8: Complaint Management and Complaint Resolution 8.1.3.6]

## **4.4 Initial Assessment and Addressing of Complaints**

### **4.4.1 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:

- How serious, complicated or urgent the complaint is
- Legal, regulatory and social impact
- 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, and
- Whether a resolution requires the involvement of other organizations.

### **4.4.2 Addressing Complaints**

After assessing the complaint, we will determine the most appropriate approach for managing it. Our complaint management process may involve the following actions:

- Seeking additional information from the complainant if the initial details provided are insufficient to conduct a thorough investigation.
- Collecting information from the product, individual, or area related to the complaint.
- Conducting a comprehensive investigation into the claims made in the complaint.
- Providing the complainant with relevant information or explanations regarding the issue raised.

Throughout this process, we will keep the complainant updated on our progress, particularly if any delays occur. Additionally, we will communicate the outcome of the complaint using the most suitable medium.

The actions we choose to take will be tailored to the specifics of each case and will consider any applicable statutory requirements. We are committed to ensuring a fair and effective resolution for every complaint we receive.

## **4.5 Investigation and Follow-Up**

The Company is committed to providing a final response to the Client within thirty [30]<sup>2</sup> business days from the receipt of the complaint. If further investigation is required and the complaint cannot be resolved within this timeframe, a holding response will be issued in writing or via another durable medium. This holding response will inform the Client when they can expect an update on the progress of the investigation.

Should the investigation take longer than thirty [30] days, the complainant will receive a written update detailing the reasons for the delay and an estimated timeframe for completing the investigation and issuing a final response.

In any case, the Company will ensure that a final response is provided no later than forty-five [45] days from the date the complaint was received, demonstrating its commitment to a timely and transparent resolution process.

*[2 - CBUAE Rulebook> All LFIs> Market Conduct & Consumer Protection> Consumer Protection Standards Article 8: Complaint Management and Complaint Resolution 8.1.3.7]*

#### **4.6 Closing the Complaint & Communication of Outcomes**

After evaluating the complaint and completing any necessary investigations, we will contact the complainant to inform them of the following:

- The outcome of the complaint and any actions taken.
- The rationale behind our decision.
- The proposed or implemented remedies or resolutions.
- Any available options for review, including internal review, external review, or appeal processes.

We are dedicated to ensuring transparency in our decision-making process and will provide clear explanations to the complainant.

#### **4.7 Record Keeping, Redress and Review**

We will keep comprehensive records about:

- How we managed the complaint
- The outcome/s of the complaint (including whether it or any aspect of it was substantiated, any recommendations made to address problems identified and any decisions made on those recommendations, and
- 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.

We will retain details of registered Complaints for a minimum period of 10 years from the date of resolution or closure, whichever is latest.

The details to be retained must include where applicable:

- The complainant's name;
- The substance of the Complaint;
- The root cause of the Complaint; and
- How the Complaint was resolved, and details of any redress offered.

##### **4.7.1 Medical Insurance Complaint Categories and Log**

For Medical Insurance, under the supervision of the Dubai Health Authority, complaints must be classified into the following categories, and the complaints log must, at a minimum, include the following details:

###### **4.7.1.1 Categories of complaint**

All complaints must be categorized in the complaints log as relating to one of the following:

- Denial of coverage
- Rejection of claim
- Accuracy of documentation provided

- Delays in process (refunds, reimbursements, approvals, issue of membership cards, additions or deletions of members)
- Administrative or operational process or procedures
- Product dissatisfaction or suitability
- Changes to policy terms (exclusions, conditions, renewal, premiums, network coverage)
- Service provided by staff or departments (efficiency, attitudinal, behavioral, knowledge)

#### **4.7.1.2 Complaints Log**

All complaints must be logged, preferably in an automated system. As a minimum, the complaints log must detail the following:

- Name of complainant
- Name of patient (where applicable)
- Date of complaint
- Name of staff member receiving and registering the complaint
- Name of staff member to whom the complaint has been directed
- Identification of a repeat complaint (that is a repeat of an earlier complaint made by the same complainant)
- Policy detail (if an existing insured member) including Policy Number, Member Number, Company name (if a corporate scheme)
- Intermediary name (if applicable)
- Category of complaint (see below)
- Detail of the complaint
- Source of complaint (telephone, email, personal visit, online facility, via a third party, etc.)

#### **4.8 Alternative Avenues for Dealing with Complaints**

We will inform individuals who submit complaints to or about us of any available internal or external review options, including relevant Ombudsman services or oversight bodies. The complainant retains the right to pursue any legal action; this right is not affected by the existence or use of the complaint procedures mentioned above.

#### **4.9 Referral to Another Body**

In the event that another body becomes apparent that is fully or partially responsible for the complaint subject, it will be referred to the concerned body as appropriate, after notifying and obtaining consent from the complainant. The following procedures should be followed in such events.

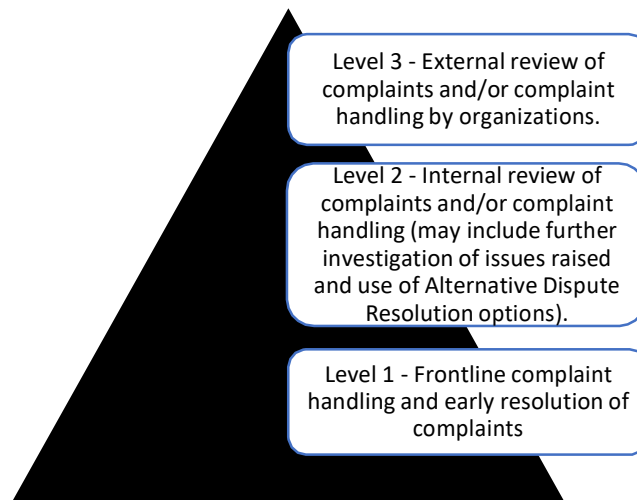
- a) Notifying the complainant that the complaint will be referred to another body because of being responsible for it, under a dated letter.
- b) In the event that the complainant agrees, the complaint shall be immediately referred along with notifying the complainant in writing of the complaint referral date, the person responsible for the complaint in the body to which the complaint was referred and the contact and communication details.
- c) Continue handling any part of the complaint that was not referred.
- d) In the event that the complainant refuses referral or does not respond within a period of not more than (10) business days, the complaint shall be considered within the limits of

the available documents and information or it shall be returned to the complainant along with provision of evidence proving the same in order to file the complaint to the relevant or competent body.

#### 4.10 External Dispute Resolution

If the complainant is not fully satisfied with the Company's response on the matter, he may refer his complaint, along with the unique reference number and a copy of the Company's final response, to the appropriate regulatory body. If a complaint is resolved in favor of the client/complainant, the Company shall promptly ensure the full and appropriate level of redress to be offered to the client/ complainant without any delay.

#### 4.11 The Three Levels of Complaint Handling



We aim to resolve complaints at the first level, the frontline. Wherever possible staff will be adequately equipped to respond to complaints, including being given appropriate authority, training and supervision.

Where this is not possible, we may decide to escalate the complaint to a more senior officer within CFS GROUP. This second level of complaint handling will provide for the following internal mechanisms:

- assessment and possible investigation of the complaint and decision/s already made, and/or
- facilitated resolution (where a person not connected with the complaint reviews the matter and attempts to find an outcome acceptable to the relevant parties).

Where a person making a complaint is dissatisfied with the outcome of CFS GROUP's review of their complaint, they may seek an external review of our decision (by the Ombudsman for example).

## 5. Accountability and Learning

### 5.1 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.

In accordance with the relevant supervisory guidance for the specific business activity or vertical, the following performance indicator reports on the process shall be generated and analyzed:

- 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.
- Complaints actual TATs
- Number of complaints outstanding at end of each calendar month
- Number of complaints unresolved after 15, 30, and 90 days
- Number of complaints escalated for outside deliberation or arbitration.
- Complainant satisfaction with outcome of internal dealing with the complaint (as a minimum a scoring system with 1= fully satisfied, 2= largely satisfied, 3= largely unsatisfied, 4= completely dissatisfied)
- Number of complaints by category
- Number of complaints fully upheld
- Number of complaints partially upheld
- Number of complaints denied (prior to any external escalation)
- Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service and make improvements.

Complaints reports are shared with CFS Group's Chief Operations Officer and Chief Risk Officer, as appropriate.

### 5.2 Monitoring of the Complaint Management System

We will continually monitor our complaint management system to:

- ensure its effectiveness in responding to and resolving complaints, and
- 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.

### 5.3 Staff Training

The Group has implemented a training program for staff focused on complaints handling procedures. This program includes instruction on how to identify complaints, as well as the appropriate methods for addressing and documenting them.

### 5.4 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
- recognize and reward exemplary complaint handling by staff
- regularly review the complaints management system and complaint data, and
- implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.

## 6. Appendix -Compliments, Complaints and Suggestions

*[Customer facing policy]*

We welcome your compliments, complaints and suggestions. The purpose of this form is to collect feedback from clients about their interaction with the Group / Company, any aspect of our customer service and products.

### **Feedback**

Your feedback informs business improvement opportunities and further enhances the quality of our services.

Feedback can be compliments, complaints and suggestions:

Compliments are praise or congratulations about the services or performance.

Complaints are an expression of dissatisfaction about policies, service delivery or how we conduct our business.

Suggestions are ideas on how we could improve our services or do our business differently.

Complaints and suggestions help us to refine and improve our policies, processes and systems.

Compliments help us recognize when we are meeting or exceeding the standards for service and performance.

We value your feedback. You can submit a complaint, give a compliment or offer a suggestion to help us improve our service.

### **How to make a complaint, suggestion or compliment**

You can provide feedback to us in a number of ways.

#### Face to Face

If you wish to submit a complaint or offer us a suggestion or compliment, you can speak to our staff. If you're not happy with their response you can speak to their manager.

You can call us on:

800242 (Toll-free) locally or

+971 4 509 1555 (Ext 581) from overseas *during the work hours (8:30 AM to 05:00 PM, Monday to Friday excluding public holidays)*

#### Online

Give feedback online by clicking the [Next](#) button

#### By Email

[compliance@cfsgroup.com](mailto:compliance@cfsgroup.com)

Note: Feedback received through social media is not treated as formal feedback for response and reporting purposes.

Please be clear, factual, and tell us the outcome you would like. If you wish to provide feedback, you must provide a valid email address, unless you elect to remain anonymous. Providing your name and contact details will help us to get in touch and help to resolve the issue. If you provide feedback anonymously, we won't be able to respond to you personally.

### **Withdrawing your feedback**

If you decide to withdraw your feedback, you should provide the request in writing or by email quoting the Feedback Reference number. You can do this by responding to the acknowledgement email or by sending a separate email from the same/registered email address you used to submit your feedback. The matter will then be closed.

### **Protecting your privacy**

Your privacy is protected in accordance with relevant privacy laws and policy

### **Your feedback**

The information that you provide is used to improve and maintain our services, and/or investigate and respond to your feedback. The information will be provided to the business area to which the feedback relates. Your information will not be used or disclosed to third parties unless your consent is provided or we are required to do so by law.

### **How we'll respond**

If you give feedback, we aim to acknowledge your contact within 2 working days.

We aim to resolve complaints within 30 working days.

If your matter is complex, it might take longer to resolve. If we can't resolve your complaint, we'll explain why and let you know your other options. If this is the case, an interim response may be provided to you.

In all cases, we guarantee that a final response will be issued within 45 days of receiving a complaint, reinforcing our commitment to prompt resolution and maintaining clear communication with the complainant.

If you are not satisfied with the outcome, you can request an internal review or contact the relevant external regulatory authorities / parties.

### **Your conduct**

We value your feedback but will not accept unreasonable conduct.

Unreasonable conduct is defined as:

- Aggressive or abusive language
- Threats of violence and harm against individuals and property, including threats of self-harm
- Malicious complaints made to damage a person's career or reputation
- Vexatious complaints made without substantive evidence
- Unreasonable demands for action which falls outside of the scope and standards of this policy
- Unreasonable persistence including refusal to accept an outcome, resolution and/or pursuing a closed complaint without any new information.
- In the event that you make threatening or abusive statements which indicate a risk of harm or violence, the company may report your conduct to the appropriate federal authorities.

If satisfied that you are otherwise acting unreasonably, the company may take steps to minimize or control the issue by:

- In the first instance, responding with advice that your feedback will not be assigned to the responsible business area, and an invitation to re-submit your feedback without the use of inappropriate language or sentiment.
- Placing restrictions on the type of contact you can make. For example, contact only in writing if a person is verbally abusive.

#### **Feedback Handling Principles**

- ✓ We aim to treat everyone politely and with respect. In return, we expect our staff to be treated respectfully and not in a way that is abusive or threatening.
- ✓ We are an inclusive organization. We don't tolerate discrimination on the grounds of religion, gender, race, ethnicity, disability, age or sexual orientation.
- ✓ We shall handle customer feedbacks and complaints in a timely and fair manner.
- ✓ We shall take all reasonable steps to investigate and respond to all feedbacks.
- ✓ We shall use our best endeavors to provide the best services/ solutions to our clients

- ✓ We acknowledge the client's right to take any legal action; and such a right remains unaffected by the existence and/or use of any complaint's policy and or procedures