



## Axeten Complaints Policy and Procedure

### 1. Policy Statement

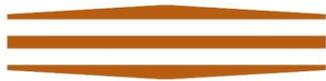
Axeten Ltd is committed to providing quality services and solutions for our customers, and working in an open and accountable way that builds trust and respect with all of our stakeholders. Our accountability is underpinned by a transparent complaints procedure that is available to customers and any other stakeholder who might wish to express dissatisfaction and seek redress from Axeten.

Axeten welcomes complaints and we treat them seriously because any outcome shall be a learning experience that shall benefit the company. As early as possible, we want to know of any issue we should address. This way, we hope we never have to address a serious issue. We need to know if we are doing something wrong, so we can put it right. Therefore, any issue or matter of concern that is received, shall be addressed in an appropriate and timely manner.

### 2. Policy Objectives

The objectives of this policy are to:-

- provide a clear framework so that stakeholders know how to make a complaint and how a complaint shall be handled, and;
- ensure that Axeten responds effectively, and;
- provide a fair and consistent process to resolve complaints, and;
- establish timescales for complaint resolution, and;
- ensure that all complainants are treated with dignity and respect throughout the process, and;
- ensure that Axeten has systems in place to make improvements to its policies, practices and procedures, as a result of a complaint.



### 3. Policy Scope

This policy applies to complaints of an operational or social nature.

### 4. Definitions

**Complaint:** an expression of dissatisfaction about an act, omission or decision of Axeten, either verbal or written, and whether justified or not, which requires a response.

**Complainant:** a person or organisation that makes a complaint.

**Escalation:** complaint that is escalated to a higher level by the Complainant or by the Axeten Respondent.

**Operational Complaint:** any matter relating to product and service delivery and contract performance.

**Remedy:** something that resolves a wrong of any kind.

**Respondent:** the person that manages and responds to a complaint.

**Stakeholder:** customers, employees, directors, contractors, consultants, investors, shareholders, suppliers, resellers, regulators, public authorities, unions, and the community.

**Social Complaint:** a matter relating to personal conduct between two or more people, including discrimination, verbal or written offensive comments, emotional or physical harassment including any activity that is sexual in nature.

### 5. Responsibility

Axeten shall :-

- acknowledge a complaint in writing, and;
- respond within a stated term, and;
- manage the complaint in a reasonable and sensitive manner, and;
- take action where appropriate.

Any potential complainant is encouraged to respond appropriately and to:-

- bring their complaint to the attention of Axeten, and;
- explain the matter as clearly as possible, and;



- provide detail that is factual and, evidence to support the complaint, and;
- request an outcome that is desired, and;
- allow Axeten a reasonable time to process the matter, and;
- understand that some circumstances may be beyond the control of Axeten.

## 6. Complaints Handling Procedure

### 6.1. Lines of Responsibility

Clear lines of responsibility are established for each type of complaint, so that:-

- business complaints shall be handled by Management, and;
- technical complaints shall be handled by the Technical/IT Department, and;
- research complaints shall be handled by the research team, and;
- training complaints shall be handled by within the training department, and;
- social complaints shall be handled by the Compliance Officer.

### 6.2. Immediate Resolution and Escalation

A complaint that is obvious and not significantly detrimental to the Complainant, shall be resolved as quickly as possible. A remedy, with an informative response shall be provided to the Complainant. Where the Complainant is satisfied with the remedy provided, no further action shall be taken and the matter shall be closed.

However, where the remedy fails, the matter is escalated to the Compliance Officer.

### 6.3. Timelines

Operational complaints, shall be resolved within 3 working days of receipt by the Respondent, unless there are exceptional circumstances.

Where a social complaint has been received, or where an operational complaint has been escalated to the Compliance Officer, a written acknowledgement is sent to the Complainant within 2 working days.



A formal response and a report with the results of the investigation shall be remitted to the Complainant after 20 working days.

Occasionally, investigations may take longer, particularly where the complaint is complex. Should this be the case, an e-mail shall be sent after 30 working days and a final date given for a conclusion to be reached.

### **6.4. Investigation Process**

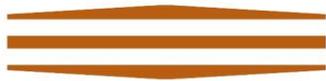
Not all complaints are suitable for immediate resolution and not all complaints shall be satisfactorily resolved at the first point of contact. Complaints that are typically complex shall require a detailed examination before the Respondent can state its position.

Where a social complaint has been received or an operational complaint has been escalated to the Compliance Officer, an acknowledgement is sent to the Complainant. The response shall provide approximate timelines and expectations for the investigation of the complaint and future responses.

The investigation process aims to establish all the facts relevant to the points made in the complaint and to give the Claimant a full, objective and proportionate response that represents the final position of the Respondent.

Investigations are conducted by the Compliance Officer, who shall gather all necessary documents, information and communications to make a comprehensive review of the complaint. The Compliance Officer shall also consult with a member of the Executive and a member of Management, and shall prepare a report on the investigation.

In the report, the Compliance Officer shall disclose all the information on which they have relied in carrying out the investigation. Any disclosure of the content of documents used or obtained in the course of the investigation is at the discretion of the Compliance Officer.



### 6.5. Resolution

After the complaint has been investigated in full and a conclusion shall be reached, a formal response and the report with the results of the investigation shall be remitted to the Complainant. The formal response shall provide an agreeable remedy

Where there might dissatisfaction at the outcome of a complaint investigation, the matter might be escalated to mediation, arbitration or law enforcement.

### 6.6. Complaints Handling Procedure Flowchart

For a better understanding of the complaints handling procedure, see Appendix 1.

## 7. Data Protection

To process a complaint Axeten shall hold personal data about the Complainant, which the individual provides, and data that other people give in response to the complaint.

Axeten shall hold this data securely and only use it to address the complaint. The identity of the Complainant shall only be known to those who need to consider the complaint and shall not be revealed to other people or made public by Axeten. However, where relevant legislation applied or allegations are made which involve the conduct of third parties, it may not be possible to preserve confidentiality.

Axeten shall delete complaint files in a secure manner in line with its Deletion Policy.

## 8. Complaint Recording

All complaints, whether operational or social, are recorded in a Complaint Register.

The following information might be collected:

- date of complaint, and;
- nature of complaint, and;



- department(s) involved, and;
- name of person dealing with the complaint, and;
- action(s) taken/recommendations made in response to the complaint, and;
- date the complaint closed.

The register shall be audited on a regular basis by the the Compliance Officer and a member of Management. The audit shall be reported to the Executive to ensure that incidents are not being repeated and improvements are being made.

### **9. Communication and awareness of this policy**

Axeten shall advise its stakeholders of this policy, and shall collaborate with them to achieve consistency with this policy.

### **10. Review of this policy**

The effectiveness of this policy shall be monitored and reviewed after each complaint process or every six months, to ensure our continuing compliance with any relevant legislation, to meet new business requirements and to identify areas in need of improvement.

### **11. Board Approval**

This policy has been approved by the Executive of Axeten.

Richard Smith – Chief Executive Officer

30 December 2020