

COMPLAINTS

Purpose

1. The purpose of this policy is to ensure that when a Board Member receives, directly or indirectly:
 - (a) any complaint or allegation relating to ACC, or
 - (b) any request for the Board Member to intervene in relation to any ACC matter

("complaint"), the complaint is dealt with in accordance with ACC policies and procedures, including the ACC Issues Management Process and ACC's "business as usual" complaints procedures. Complaints made to Board Members are not accorded substantively different treatment to other ACC complaints.

This policy protects ACC and the Board from allegations of unequal treatment of complainants, and protects Board Members from allegations of improper interference in management of ACC's operations, or failure to disclose actual or potential conflicts of interest.

Process

2. Board Members should remain alert to the circumstances in which a perceived conflict of interest may arise (see section 4.4 of the Board Governance Manual - Management of Interests and Conflicts of Interest). In general, a Board Member should decline to engage in a direct dialogue with individual complainants and should seek to direct complaints to the appropriate channels within ACC. A Board Member should not make arrangements to hear or discuss a person's complaint without obtaining the Chair's prior approval. However, from time to time, Board Members will nonetheless receive complaints. Board Members should disclose all such approaches.
3. The following process, coordinated by the Company Secretary, should be followed when a complaint is made to a Board Member:
4. **Step One - Forwarding of complaint:** A Board Member who receives a complaint should notify the Company Secretary of the complaint as soon as practicable. The Board Member should also, if appropriate, inform the complainant at the time that they will not be able to deal with the complaint personally, but will ensure that it is considered by ACC. If the complainant is identifiable, the Company Secretary shall send a standard form letter on the Board Member's behalf stating that the complaint has been referred to them by the Board Member and that the complaint will be considered in due course and following standard ACC complaint procedures.
5. **Step Two - ACC complaint procedures:** The Company Secretary shall, as soon as practicable and in consultation with the Corporate Issues Manager, ensure that the impact, likelihood and urgency of the complaint is evaluated in accordance with the Strategic Risk Rating Framework and that the complaint is then assigned to a responsible manager within ACC's Issues Management Process or ACC's "business as usual" complaints procedures at an appropriate level.
6. **Step Three - Reporting:** The Company Secretary shall, in respect of each complaint:
 - (a) confirm to the Board Member and the Chair that the complaint is now being considered under the appropriate ACC procedures, and

- (b) once the complaint has been finally dealt with, "close the loop" by informing the Board Member.
- 7. Board Members will not normally be involved in the investigation or resolution of any complaint they have received, and will not normally be briefed on the ongoing progress of such complaint simply because it was made to them. Should the Board Member wish to know such information, he or she should raise the request with the Chair.
- 8. Under ACC's Strategic Risk Rating Framework and Issues Management Process, the Board will be advised of all "severe" and "extreme" risks, including those arising in relation to complaints. Management will also periodically brief the Board on complaints received by ACC, and their resolution, which may include those received by Board Members directly.
- 9. **Step Four:** To ensure transparency, when the Company Secretary is notified of a complaint received by a Board Member, he or she will record the details in a "Complaints Register", will record the process that has been determined for the complaint to be considered by ACC, and will note when the complaint has been finally resolved.

Review

- 10. This policy should be reviewed as part of the Governance Manual review on an annual basis.