

Complaint and Dispute Resolution Policy – HighFlow Energy



1 Summary

1.1 In keeping with HighFlow Energy's Retail Licence obligations and Compliance Framework, HighFlow Energy will undertake several activities to ensure that customer complaints are managed in an efficient and timely manner and in accordance with the terms of HighFlow Energy's Retail Licence.

1.2 The Energy Retail Code (ERC) section 28.1 states "*A retailer must handle a complaint by a customer in accordance with the relevant Australian Standards on complaints handling.*" The original Australian Standard for complaints handling was AS 4269 in 1995, and this has been superseded over the years. The relevant current Australian Standard and is AS/NZS 10002: 2022 *Guidelines for complaint management in organizations*, with the international standard subsequently adopted in 2022 in substantially similar terms.

2 Background

2.1 This Complaints Policy has been developed by HighFlow Energy following the consideration of several factors. It is recognised that maintaining an effective and efficient Complaints Management System will contribute towards increasing customer satisfaction, customer retention, early recognition of system and process failures, quality management systems, as well as an effective compliance and risk monitoring system.

2.2 Whilst the Licence and the ERC refers to compliance with the Australian Standards, HighFlow Energy has established this Policy in line with International Standards (AS ISO 10002:2022) in order to ensure that it remains at the forefront of developments in the management of complaints.

2.3 The corner stone of HighFlow Energy is its ability to deliver Simple, Transparent and Customer Focused Products and Services to its customers.

3 International Standards for Complaints Handling (ISO 10002)

3.1.1 ISO 10002:2022 recognises the following elements as the guiding principles for effective complaints management:

- Visibility
- Accessibility
- Responsiveness
- Objectivity
- Charges
- Confidentiality
- Customer-focussed approach
- Accountability
- Continual Improvement

3.2 This policy incorporates complaints handling for customers of HighFlow Energy.

3.2.1 It should be noted that as ISO 10002:2022 is not applicable for external dispute resolution or employment related issues. The external dispute resolution aspect is designed in line with the Operational Procedures of the Ombudsman Scheme/s. The employment related Issues are covered in the Human Resources Procedures.

4 What is a Complaint? How to Lodge a Complaint?

4.1 "A verbal or written expression of dissatisfaction about an action, a proposed action or a failure to act, or in respect of a product or service offered by or provided by a retailer, its employees or contractors where a response or resolution is explicitly or implicitly expected. This includes failure by a retailer to observe its published practices or procedures".

4.2 Contact us to Lodge a complaint

You may contact us at any time to lodge a complaint using the following contact details:

HighFlow Energy PO Box 583 Buddina QLD 4575

E: complaints@highflowenergy.com.au

Phone: 1300 650 849

5 Criteria for Identifying a Complaint under the Definition

- 5.1 A complaint can be received either in writing or verbally
- 5.2 Complaints differ from an enquiry when it is an “expression of dissatisfaction”
- 5.3 The expression can be related to but not limited to an action, a proposed action, or a failure to act by HighFlow Energy.
- 5.4 The complaint can be in relation to and not limited to a product or service offered or provided by HighFlow Energy.
- 5.5 The complaint can be in relation to and not limited to HighFlow Energy and its employees or contractors and any representatives of the HighFlow Energy brand.
- 5.6 The complaint can be in relation to and not limited to failures by HighFlow Energy to observe its published practices or procedures.
- 5.7 Some examples of complaints can be in relation to:
 - 5.7.1 Wrongful disconnection
 - 5.7.2 Claims of harassment by Sales Agents or Debt Collection Agents
 - 5.7.3 Failure to follow through on a service or advice given to a customer or on a customer request
 - 5.7.4 Failure to adhere to company policy and procedures as expressed by the customer

6 Recognition of Systemic Issues

- 6.1 It is crucial that HighFlow Energy can identify systemic and reoccurring issues and complaints. An effective complaints management system will be able to identify and capture this information for the purpose of increasing the quality of service and risk management.
- 6.2 A valuable source of identifying systemic issues is through internal customers or employees of HighFlow Energy who have the skills, knowledge, and ability to identify systematic problems at early stages.
- 6.3 HighFlow Energy encourages staff to identify any potential or actual systemic issue and raise it with their immediate manager or notify the Regulatory and Compliance Department to enable HighFlow Energy to take corrective action and/or mitigate any exposure to the organisation.

7 Providing Visibility

- 7.1 In order to provide customers with visibility into the complaints management system and opportunity to raise concerns HighFlow Energy utilises several methods.
- 7.2 All invoices issued provide a contact number and encourages customers to contact HighFlow Energy to provide feedback or raise any concerns.
- 7.3 Any customers making contact through this contact number can lodge a complaint for investigation by the Customer Service Representatives and if the customer is unhappy with the response, request to have the complaint escalated to a higher level within the business. The

customer is then advised in writing that if he or she remains dissatisfied, he or she has the right to refer the complaint to the Energy Ombudsman or other relevant external dispute resolution bodies.

- 7.4 Customers are invited to provide feedback or raise concerns through the HighFlow Energy web site.

8 Responsiveness

- 8.1 All complaints received by HighFlow Energy will be acknowledged either in writing or verbally.
- 8.2 Level 2 and 3 complaints (described in section 18) will be acknowledged in writing when required.
- 8.3 All complaints received will be addressed promptly and in line with their urgency.
- 8.4 All complaints will be managed courteously, and HighFlow Energy will ensure that the complainant is kept informed through the process
- 8.5 All complaints will be managed in line with this policy and the process.
- 8.6 All complaints will be resolved within a reasonable period, avoiding unnecessary delays. If a complaint is not resolved within one month of the date the complaint has been made the customer will be advised either in writing or verbally of their right to raise the complaint with the Ombudsman.
- 8.7 If a complaint is not resolved internally in a manner acceptable to the customer an explanation will be provided to the customer either verbally or in writing of the resolution offered and details of the investigations. The customer will also be advised of their right to refer the matter to the Ombudsman.

9 Objectivity

- 9.1 Any complaint will be managed and assessed on its individual merit with HighFlow Energy's aim being to resolve the complaint.
- 9.2 All complaints will be managed in an equitable, objective, and unbiased manner through the complaints handling process.

10 Charges

- 10.1 Access to the complaints-handling process will be at no cost to the customer.
- 10.2 The customer will only incur a cost if he or she requires investigations to be carried out that require the assistance of a third party who charges for those investigations. For example, an energy auditor, meter test etc.

11 Confidentiality and Record Keeping

- 11.1 As per AS ISO 10002:2022 "Personally identifiable information concerning the complainant should be available where needed, but only for the purpose of addressing the complaint within the organization and should be actively protected from disclosure, unless the customer or complainant expressly consents to its disclosure".
- 11.2 As per section 7.1 of the Marketing Code, HighFlow Energy will retain records of the grounds for complaint, the outcome including the reasons for the outcome of the complaint and statistics of the number of complaints made to HighFlow Energy. These records will be kept for a minimum of two years or the duration of the customers stay with HighFlow Energy and made available for an independent audit on request.

12 Customer Focused Approach

- 12.1** When managing a complaint HighFlow Energy will adopt the three main principles of natural justice.
- 12.2** THE HEARING RULE - HighFlow Energy will provide the customer with an adequate opportunity to state their complaint and respond to the outcomes of the investigations conducted by HighFlow Energy.
- 12.3** THE BIAS RULE - HighFlow Energy will address each complaint with an independent approach and ensure that each complaint is viewed on its own merits. The decisions will be impartial and based on a balanced and considered assessment of the results from the investigation without favouring one party.
- 12.4** THE EVIDENCE RULE - The decision-making process with managing a complaint will be based on logical proof or evidence material at all possible times. HighFlow Energy wherever possible will avoid decisions based on speculation or suspicion.

13 Accountability and Reporting

- 13.1** On conclusion of the investigations of each complaint, HighFlow Energy will attempt to identify any system or process failures and if identified the issue will be raised with HighFlow Energy's designated Compliance Manager.
- 13.2** The Customer Care Manager will on a weekly basis report to the Executive Team the number and type of complaints received by HighFlow Energy.
- 13.3** The complaints register will be the basis of recording all complaints which will be reviewed by the Customer Care Manager monthly.
- 13.4** All systematic issues will be reviewed by the HighFlow Energy's Regulatory and Compliance Team monthly unless urgent action is otherwise required. Necessary action will be taken to mitigate the issue and the impact on customers.
- 13.5** Where appropriate the Compliance Manager will notify relevant regulatory bodies of any complaints received by HighFlow Energy.
- 13.6** Any reports to the relevant regulator will be prepared and submitted in line with relevant requirements, including compliance and performance reporting requirements.

13.7.1 Complaints -Billing / Credit

"A complaint regarding overcharging, prices payment terms and methods, and debt recovery practices. This category may include billing errors, incorrect billing of fees and charges, failure to receive relevant government rebates, high billing, credit collection, disconnection and reconnection, and restriction due to billing discrepancy, but is not limited to these examples"

13.5.2 Complaints - Marketing

"A complaint associated with a retailers' actions in seeking to sign up a small customer for a contract, and may include matters such as the nature of the approach or conduct, advertising campaigns, contract terms, sales techniques and misleading conduct, but is not limited to these examples"

13.5.3 Complaints -Transfers

"A complaint associated with the financial responsibility for a customer's meter being transferred to an existing or new retailer and may include, but is not limited to, failure to transfer within a certain time period disruption of supply due to transfer and billing problems directly associated with the transfer (e.g., delay in billing, double billing)"

13.5.4 Complaint - Other

“Any complaint about the quality and timeliness of retail services, other than a billing complaint, marketing complaint or a transfer complaint. Examples include poor service, privacy considerations, failure to respond to complaints, and health and safety issues.”

14 Continual Improvement

14.1 Phone Monitoring

The Customer Care Manager will regularly conduct live call monitoring. The objective of this exercise is to determine the effectiveness and skill of the Customer Care Officer and identify training and development needs.

14.2 Customer Surveys

On an annual basis HighFlow Energy will conduct customer audits by randomly selecting several customers who have experienced the complaints handling process. The objective of this exercise is to identify possible improvements to the complaints management process. The intent of this exercise is to gage the customer’s satisfaction with the process experience and not the outcome of the complaint.

15 Process Management

15.1 The management of the complaints handling process is the responsibility of HighFlow Energy's Customer Care Manager. However, HighFlow Energy as a whole, is dedicated to ensuring that customer complaints are captured, managed, and resolved in a timely manner. The Customer Care Manager will review monthly the complaints register and consider the nature of the complaints received with a view to identifying opportunities to improve the quality of the service offered to customers.

16 Stages of Complaints Handling

16.1 Level 1/Frontline Complaints – These are complaints received and managed by the Customer Care Team.

16.2 Level 2/Escalated Complaints – Any complaints which cannot be resolved at the frontline, require detailed investigation. The complainant has the right to request contact with a team leader/ manager and that a matter be escalated to a team leader / manager for resolution.

16.3 Level 3 - Complaints which cannot be resolved at a level 1 or 2 or if you are dissatisfied with the outcome of your complaint. We will inform you of the energy ombudsman, noting that Energy and Water Ombudsman schemes are free and independent. This referral may be provided verbally or in writing.

External Dispute Resolution

All our customers have the right to contact the Energy & Water Ombudsman NSW (EWON) , QLD (EWOQ) or ACAT (ACT) to lodge a complaint or for free independent information and advice. EWON , EWOQ and ACAT investigates and resolves complaints from customers of electricity and gas providers, and some water providers.

EWON's contact details are:
NSW Freecall: 1800 246 545
Freefax: 1800 812 291
Website: www.ewon.com.au
Post: Reply Paid 86550, Sydney South NSW 1234

Queensland EWOQ Contact: Energy and Water Ombudsman QLD (EWOQ)
Phone: 1800 662 837 Website:
www.ewoq.com.au

ACT ACT Civil & Administrative Tribunal (ACAT)
Phone: 02-6207 1740
Website: www.acat.act.gov.au

17 Inclusions

To manage the process of complaints, the following documents have been created and form part of this policy:

- Appendix A – Complaint Acknowledgement Letter
- Appendix B – Complaint Closure Letter
- Appendix C – Definitions

18 Failure to Adhere to this Policy

Where it is recognised that a staff member has failed to comply with this policy, appropriate disciplinary may take place.

Complaint Acknowledgement Letter

[date]

[name]

[address]

[suburb] [postcode]

Dear [name],

In relation to your concerns raised on <.....>

We would like to thank you for taking the time to raise your concerns with HighFlow Energy and providing us with the opportunity to address them.

We are currently in the process of investigating your concerns and hope to be in contact with you within the next five business days. Your concerns are being addressed by the appropriate staff members and will be managed in an efficient and timely manner.

At HighFlow Energy we pride ourselves on providing outstanding customer experience in line with our vision and are always looking for opportunities to improve. Your feedback is valued and will assist us in this endeavour.

In the meantime, if you require any further assistance, please contact us by:

- Phoning our call centre on 1300 650 849; or
- E-mailing us at complaints@highflowenergy.com.au

We appreciate your feedback and thank you for the opportunity given to address your concerns.

Yours sincerely,

<Name>

Customer Care Manager

Appendix B

Complaint Closure Letter

[date]

[name]

[address]

[suburb] [postcode]

Dear [name],

In relation to your concerns raised on <.....>

We would like to thank you for the opportunity given to address your concerns.

We have made every effort to help resolve your concern, and as such, we are now closing your complaint.

If we have not resolved the complaint to your satisfaction, you have the right to refer your concerns to the Energy and Water Ombudsman should you wish to pursue this matter further.

Once again, we thank you for the opportunity given.

Yours sincerely,

<Name>

Customer Care Manager

Appendix C

Definitions

Complaints Reporting to the Australian Energy Regulator

With the adoption of the National Energy Retail Law (South Australia) 2011 (SA) in the state of Victoria HighFlow Energy will amend its reporting of Customer Complaints to reflect the requirements set out in the AER Guidelines Performance Reporting Procedures and Guidelines (June 2012 Version 2). The reporting definition will be consistent with Schedule 3 of the Guidelines (Retail Market Activities Report)

Complaint

'An expression of dissatisfaction made to an organisation, related to its product/services, or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected'. Complaints can be made in person, by telephone or in writing (for example, letter, email, facsimile). For the avoidance of doubt, complaints include the following type of contacts:

- Where a customer expresses dissatisfaction and seeks a response or resolution regarding the conduct, action, proposed action, or failure to act by the retailer, its employees, agents, contractors, or other representatives. This includes failure by the retailer to observe its published or agreed practices or procedures or in respect of a product or service offered or provided by the retailer or its representatives;
- Where a customer threatens to involve, or enquires about the possibility of involving, a third party, for example, the jurisdictional energy ombudsman or Member of Parliament;
- Where a complaint is directed to the retailer on behalf of the customer by an energy ombudsman scheme.

Billing Complaint

Includes (but is not limited to) a complaint regarding prices, overcharging, high bills, billing errors, payment terms and methods, failure to receive government rebates and debt recovery practices including complaints about imminent and actual disconnection, etc.

Energy Marketing Complaint

Includes (but is not limited to) a complaint associated with a retailer's or its agents/representatives' actions in seeking to sign up a small customer for a contract for energy supply/service and may include matters such as the sales approach or conduct, advertising campaigns, contract terms, sales techniques, misleading conduct, etc.

Customer Transfer Complaint

Includes (but is not limited to) a complaint regarding the financial responsibility for a customer's electricity or gas account being transferred to either an existing or new retailer and may also include general transfer complaints such as failure to transfer within a certain period, disruption of supply due to transfer and billing problems directly associated with transfer, etc.

Other Complaints

Includes any complaint not included in the definitions of billing, energy marketing and customer transfer complaints above.