

De'Longhi Australia Pty Ltd

Complaints Handling Policy and Procedure

1. POLICY

De'Longhi is committed to handling complaints, originating both internally and externally, in a clearly defined, effective and expeditious manner.

Our values and way of working foster a culture that:

- treats customers, employees and suppliers with respect by acknowledging their right to complain and have a complaint handled professionally;
- actively solicits and acts on customer feedback; and
- acknowledges that a complaint received gives De'Longhi an opportunity to maintain confidence in our brand.

Any person or organisation who has any concerns about inappropriate or improper conduct¹ or non-compliance by De'Longhi with its policies, procedures or applicable laws is invited to lodge a complaint that will be dealt with in accordance with this Complaints Handling Policy and Procedure.

De'Longhi's Compliance Officer, Alan Frettingham, is responsible for managing the handling and registration of complaints.

De'Longhi is committed to the principles embodied in the Australian Standard for complaints handling.²

Remember – handling complaints is everyone's job. Everyone working within De'Longhi must understand this Complaints Handling Policy and Procedure. If you do not or if you have any questions, contact the Compliance Officer.

NOTE: Where the complaint alleges improper conduct or anticompetitive conduct – for example, complaints relating to:

- fraud;
- corruption;
- illegal activity;
- anticompetitive conduct:
 - De'Longhi communications with competitors regarding:
 - prices charged to customers or resellers;
 - pricing or other terms of tenders;
 - the supply of goods or services to particular areas or regions;

¹ Improper conduct may include fraudulent; corrupt; dishonest; illegal, unethical; or engagement in outside interests, activities or investments which could interfere with the performance of duties or constitute a conflict of interest. Improper conduct also includes conduct which involves substantial risk to public health and safety or the health and safety of De'Longhi employees; substantial risk to the environment; or substantial mismanagement of De'Longhi resources.

² The current Australian Standard is AS/ISO 10002-2006 – Customer Satisfaction – Guidelines for complaints handling in organisations.

- winning or losing customers
- restrictions being imposed on suppliers or customers

notify the Whistleblower Protection Officer, Carissa Patruno immediately, as the complaint must be dealt with in accordance with the De'Longhi Whistleblower and Improper Conduct Policy and Procedure.

2. COMPLAINTS HANDLING PROCESS

De'Longhi may receive a complaint via a number of channels including:

By phone: 1800 126 659	Via website enquiry form	In writing	Via a De'Longhi Rep	Other
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In each case, the complaints resolution process outlined below should be followed.

The person who first receives the complaint will:

- Immediately acknowledge the complaint (either during the phone call from the complainant or by way of email or fax);
- Record the complaint in the Complaints Handling Register giving the complaint a unique identification number;
- If necessary, retain a file on the complaint;
- Gather sufficient detail about the complaint in order to properly investigate and respond (eg. information about an incident or product, timing, persons or companies involved). This information must be recorded in the Complaints Handling Register. Any collection or use of private information must be in accordance with De'Longhi's Privacy Policy (available at www.delonghi.com.au/legal).
- If they can resolve the issue on the spot, they will do so, then record how the matter was resolved and change the status of the matter in the Complaints Handling Register to 'closed'. If they are not able to resolve the complaint within 3 days, they must escalate the complaint to the Compliance Officer. The Compliance Officer should respond within 2 business days of the complaint being escalated. Escalated complaints should be resolved in most cases within 10 business days.
- Where the matter relates to a product or service or technical issue that cannot be resolved at first instance, they will transfer the complainant to the relevant business division and note this step in the Complaints Handling Register. The representative at the relevant business division must take steps to resolve the complaint. If the complaint cannot be resolved by that representative within 7 days, the complaint must be escalated to the Service Manager.
- The Service Manager must resolve the complaint within a further 3 days or a longer period agreed with the complainant. If the Service Manager cannot resolve the complaint within the further 3 days or period agreed with the complainant, the complaint must be escalated to the General Manager Sales.
- If the General Manager Sales cannot resolve the complaint within a further 2 days or a longer period agreed with the complainant, the complaint must be escalated to the CEO.

NOTE: Each escalation step must be recorded in the Complaints Handling Register.

If, at any point, a complainant threatens legal proceedings, or a regulator is involved or is likely to become involved, the person handling the complaint must consult with the Compliance Officer, who will then seek external legal advice as required.

The Compliance Officer will regularly check the Complaints Handling Register to ensure matters are promptly escalated when they cannot be resolved and will obtain external legal assistance where the Compliance Officer considers it appropriate to do so.

3. SOLUTIONS AND REMEDIES

A number of remedies are available to address customer complaints. These reflect good industry practice; are fair and reasonable in the particular circumstances; and meet De'Longhi's legal obligations.

Options include:

- Refund or replacement product/services (in accordance with De'Longhi's Goods Return Policy)
- Information, explanation or technical assistance
- An apology
- Compensation

Discuss the appropriate options with De'Longhi's Compliance Officer.

The remedies available for an internal complaint will depend on the nature of and circumstances surrounding the complaint. De'Longhi's Compliance Officer should consider these options where relevant.

What if De'Longhi is not at fault?

If, after a careful investigation, De'Longhi is not at fault or liable, a carefully worded letter should be sent to the customer or employee explaining our position. This must be approved by the Compliance Officer with external legal input where necessary.

What if the complaint is not resolved to the complainant's satisfaction?

If the complainant rejects De'Longhi's proposed decision/action, the complaint should remain open in the Complaints Register. This should be recorded and the complainant should be informed of alternate forms of external recourse available. Again, you must speak with the Compliance Officer prior to taking this step.

4. COMMUNICATING AND RECORDING

Our Customer Call Centre is the main contact point for dissatisfied customers. Complaints may also be received by De'Longhi's Customer Service Representatives.

The Compliance Officer is usually the initial recipient of internal complaints.

All complaints must be recorded in the Complaints Handling Register by the person who receives the complaint (usually the call centre team). If a matter is escalated, the person to whom the matter is escalated must maintain the currency of the Register.

A template of the Complaints Handling Register is attached to this Policy at Annexure A.

Guidelines for communicating with complainants can be found in the De'Longhi document "Customer Care: Guidelines to Answering Calls", which is attached to this policy at Annexure B.

5. COMPLAINTS HANDLING PRINCIPLES

De'Longhi will handle complaints in accordance with the following principles:

Commitment De'Longhi is committed to the efficient and fair resolution of complaints.

Confidentiality	The identity of a complainant may be recorded in the complaints handling system for the purpose of dealing with the complaint, but is not otherwise disclosed without consent or unless it is necessary to do so in order to investigate the complaint.
Fairness	<p>De'Longhi recognises the need to be fair to the complainant and to deal with all complaints in an impartial manner.</p> <p>No decision or subsequent action will be taken until the complaint has been appropriately investigated.</p> <p>Following submission of a complaint, respondents have a right to know all the allegations made against them, and to be given the opportunity to fully respond.</p> <p>It may be inappropriate for a particular person to deal with a particular complaint. This person may be a friend or have a close working relationship with the complainant. In such cases, the matter will be referred to another appropriate manager.</p> <p>De'Longhi will ensure that a person making a complaint or any related party or witness is not victimised in any way.</p> <p>All De'Longhi Personnel are entitled to make a genuine complaint knowing that such action will not, in any way, affect their current employment status, future career prospects or general standing in the workplace. (For further information see De'Longhi's Whistleblower and Improper Conduct Policy and Procedure.)</p>
Responsiveness	All complaints will be dealt with in a timely and courteous manner.
Resources	De'Longhi will allocate sufficient resources for complaints handling and resolution.
Visibility & Access	This Policy will be distributed to all employees and is available on its internal site and, in an abridged form, on its website www.delonghi.com.au . This Policy will be distributed to all new employees and contractors as part of the induction process and will be referred to during relevant ongoing compliance training.
Assistance	De'Longhi's Compliance Officer can assist with the formulation and lodgement of complaints if required.
Remedies	Appropriate remedies for complaints will be determined and implemented in accordance with this Policy. If the informant believes that this Policy has not been followed properly, or the outcome is unacceptable, the complainant may contact the Chief Executive Officer for a review.
Data Collection	All complaints and records of outcomes will be recorded in a Complaints Register.
Review and audit	De'Longhi analyses its Complaints Register with a view to identifying and rectifying systemic and recurring problems (caused by failures in the product or service design, delivery system or organisational policy or procedures).
Accountability	De'Longhi's Compliance Officer will report on the operation of this Policy to De'Longhi's Senior Management Team every 6 months.

6. REVIEW

This Policy will be regularly reviewed by the Compliance Officer and De'Longhi's senior management.