

# Arrow Energy

# Complaints Management System

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## 1. Policy/System Statement

Arrow Energy is committed to managing all complaints in an accountable, transparent, timely and meaningful way.

The company's Complaints Management System is consistent with the Australian Standard ISO 10002-2006 'Customer satisfaction – Guidelines for complaints handling in organisations' and aligns with Arrow Energy's values to:

### **Lead**

We lead by continually seeking ways to improve safety, delivery, cost, quality, and teamwork.

### **Own**

We think and act like owners taking personal responsibility for Arrow's business performance and conduct.

### **Solve**

We view challenges not as barriers but as opportunities to improve through innovation and change.

### **Integrate**

We are seamless in our coordination between departments, groups and systems to drive continuous improvement.

### **Respect**

We treat all people, inside and outside Arrow, with dignity and respect.

## 2. Guiding Principles

Arrow Energy is committed to the following complaints management guiding principles:

- **Visibility:** Arrow Energy will provide information to its stakeholders including landholders, community members, industry partners, employees and contractors about how and where to complain.
- **Accessibility:** Complainants can easily access the complaints management process and information on the process.
- **Responsiveness:** All complainants should be sent written acknowledgment within two business days that their complaint has been received (where adequate stakeholder contact details have been provided). Complainants should be treated courteously, and kept informed of the progress of their complaint throughout the process.
- **Objectivity:** Each complaint should be addressed in an equitable, objective and unbiased manner through the complaints management process.
- **Charges:** Complainants will incur no cost or charges as a result of accessing the complaint management process.
- **Confidentiality:** This policy should be read and implemented in conjunction with the Arrow Energy Privacy Policy.
- **Stakeholder - focussed approach:** Arrow Energy has a stakeholder – focussed approach which views complaints as an opportunity to improve its business, is open to feedback, and should display commitment to resolving complaints by its actions.

- **Accountability:** Arrow Energy will ensure that accountability for, and reporting on, the actions and decisions of the organisation with respect to complaints management is clearly established.
- **Continual Improvement:** The opportunity for continual improvement of the complaints management process will be delivered through a regular review which will monitor performance and trend the nature, timeframes and resolution of complaints.

### 3. Scope

Arrow Energy business-related complaints are within scope of this system. There are a small number of exceptions, outlined below:

- contractual and human resource (HR) related complaints (see Section 8 - Specific Complaints)
- general feedback obtained during consultation processes
- queries and requests for information.

The complaint system supports Arrow Energy's statutory obligations to investigate and report on safety, environment and other incidents, and to respond to any Compliance Direction Notices to external stakeholders, including Government. This can include the requirement for public disclosure of some incidences and rectification measures undertaken by the company. Failure to do so can lead to prosecution.

This system does not replace, modify or revoke any legislative, contractual or other legal requirements for the management of particular types of complaints. The management of complaints related to contractual or HR related matters are listed under 'specific complaints' and are addressed within Section 8 of this document.

General feedback obtained during consultation sessions, particularly those required under Queensland legislation for the Environmental Impact Statement (EIS) process, is formally recorded during the sessions through a discrete information collection and collation system. Records of individual stakeholder discussions at information sessions, where relevant, will be recorded in Dynamics. This information will be monitored to inform, where applicable, the management and resolution of issues and complaints, and to assist in the overall improvement and response to stakeholders.

Exemptions to the application of the system can be granted by the Chief Executive Officer.

#### 3.1 *Record keeping*

Comments, questions or information received from stakeholders, and deemed by the relevant Vice President or General Manager as an issue, will be tracked through the stakeholder engagement database, Dynamics. Relevant information will be reviewed and shared with the wider Arrow Energy Team as appropriate.

#### *Complainant information*

Personally identifiable complainant information will be recorded where needed, but only for the purposes of addressing the complaint within Arrow Energy. The complainant's information will be actively protected from disclosure, unless the complainant expressly consents to its disclosure.

#### *Arrow Energy staff information*

In order to afford natural justice to an employee and/or representative of Arrow Energy whose conduct may be the subject of a complaint, access to the relevant information registered through the Complaints Management System (CMS) will be restricted to agreed staff.

Due regard to the privacy of the complainant, the Arrow Energy staff member and the subject matter of the complaint will be maintained when issues are recorded in Dynamics. The minimal detail recorded will be sufficient to enable identification of the individual complaint.

Supporting documentation (including emails) detailing information associated with sensitive complaints should not be accessible within Dynamics, but should be maintained by the complaints facilitator, in a secure alternate location.

#### 4. Applicability

This system applies to all Arrow Energy staff including, temporary, casual and contracted staff. **This system also applies to all personnel or organisations contracted either directly or indirectly, to carry out activities on Arrow Energy's behalf.**

#### 5. Objectives

The objectives of this system are to:

- a) Provide a transparent, consistent and effective mechanism for the management and prompt resolution of complaints
- b) Demonstrate greater accountability to stakeholders
- c) Improve relationships with stakeholders through greater trust and credibility
- d) Identify complaint trends and monitor the company's performance in complaint management
- e) Provide information for business improvement opportunities as part of our commitment to Lean business principles
- f) Enhance Arrow Energy's reputation as a responsive and stakeholder-focussed organisation.

#### 6. Rationale

Complaints management is a vital component of every decision-making framework and is especially relevant to Arrow Energy in its delivery of a coal seam gas project in Queensland.

Feedback is one measure of stakeholder satisfaction and as such plays an important part in determining if Arrow Energy is meeting its stakeholder's needs and responding to their issues and concerns. To ensure we respond effectively to stakeholder feedback and complaints, it is critical for the organisation to make available and demonstrate its complaints management process.

#### 7. Policy/System Elements

Arrow Energy's Complaints Management System reflects the following elements (additional detail provided at Appendix A):

##### 7.1. *Visibility and Access*

Complaints about Arrow Energy's policies, operations, activities, and projects can be lodged by any member of the public, landholder, shareholder, or other stakeholder. Information on where and how to lodge a complaint is readily available through established Arrow Energy communication channels.

##### 7.2. *Responsiveness*

Complaints received by Arrow Energy can be sensitive and complex and may require detailed investigation and analysis. Timeframes for the management of complaints are to be reasonable and not be excessively

drawn out. Where sufficient stakeholder contact details have been provided, all face-to-face and phone complaints will be sent formal *written acknowledgement of complaint receipt within 2 business days*. Similarly, all written complaints, including emails, will receive formal acknowledgement of complaint receipt through a written response sent within 2 business days of receipt, where sufficient stakeholder contact details have been provided.

### 7.3. Assessment and Action

Upon receiving a complaint, Arrow Energy staff will undertake documented steps to ensure that the complaint is properly understood, investigated and closed out in a timely manner. If Arrow Energy is not able to address the complaint, where possible, the complaint will be referred to the appropriate agency or party (for example a local council or government agency) with the complainant advised as applicable.

### 7.4. Corrective Action and Resolution

The progress of the complaint is monitored until the outcome has been communicated to the complainant where appropriate and all reasonable avenues have been exhausted. If the complainant is dissatisfied with the outcome, they are advised of independent review bodies available.

### 7.5. Monitoring Effectiveness and Continual Improvement

Complaint trends, as recorded through Dynamics, will be reported to the Arrow Energy Leadership Team on a regular basis.

## 8. Specific Complaints

Some complaints are classified as 'specific complaints' due to particular contractual or HR requirements. On receipt of any complaint, preliminary assessment should be undertaken by the Complaints Facilitator to determine if it falls within a 'specific complaints' category.

Due to the sensitive nature of many specific complaints, they should be registered as per the Complaints Management System requirements in the stakeholder engagement database (Dynamics/CRM) with due regard to the sensitivity of the issue, maintaining privacy and confidentiality of all affected parties. The business area to which a 'specific complaint' is referred will record full details of the complaint and resolution in the appropriate system and action as applicable.

### 8.1 Contractual complaints

Complaints relating to third parties, who are acting as agents or service providers for Arrow Energy, will be managed in accordance with contractual arrangements by Contracts and Procurement (C&P) under a separate system.

The Government Relations and Community Relations Managers within the External Relations and Tenure Management department should be made aware of relevant contractual and legal related complaints as part of Arrow's EIS Social Impact Management Plan (SIMP) reporting requirements.

### 8.2 Human Resources Related Complaints

The following complaints should be referred to the HR management and managed in accordance with relevant legislative and organisational requirements:

- Discrimination complaints

- Performance management
- HR Code of Conduct complaints
- Workplace health and safety complaints (those deemed to be HR related) should be referred to the HR Manager to be addressed through the Workplace Health and Safety Coordinator.

#### 9. Complaint Process

It is anticipated that the complaint handling system will be dynamic and will continue to change and improve on an ongoing basis. Current complaint and compliance process mapping is attached as Appendix B.

#### 10. Definitions

Term	Definition
Complainant	The person who makes the complaint.
Complaint	The expression of dissatisfaction, orally or in writing, about the policies, operations, activities, and projects of Arrow Energy or its staff.
Confidentiality	Access to the information is controlled and the information does not have to be of a personal nature.
Privacy	The information is of a personal nature and reasonable steps are taken to protect the personal information from loss, unauthorised access, use or disclosure.
Specific complaint	The complaint has specific contractual or human resource related requirements that are out of scope of the Complaints Management System.
Systemic issue	A deficiency in an organisation's administrative process, rather than an error in judgement by an officer, which causes or contributes to a complaint.

#### 11. Reference Material

- Australian Standard ISO 10002:2006 *Customer satisfaction – Guidelines for complaints handling in organisations*
- Queensland Ombudsman, *Developing Effective Complaints Management Policy and Procedures December 2006*
- Queensland Ombudsman, *Complaints Management – Recognising Opportunities for Improvement, 2001*

## 12. Appendix A: Arrow Energy Complaints and Compliance

# Appendix A – Arrow Energy Complaints and Compliance

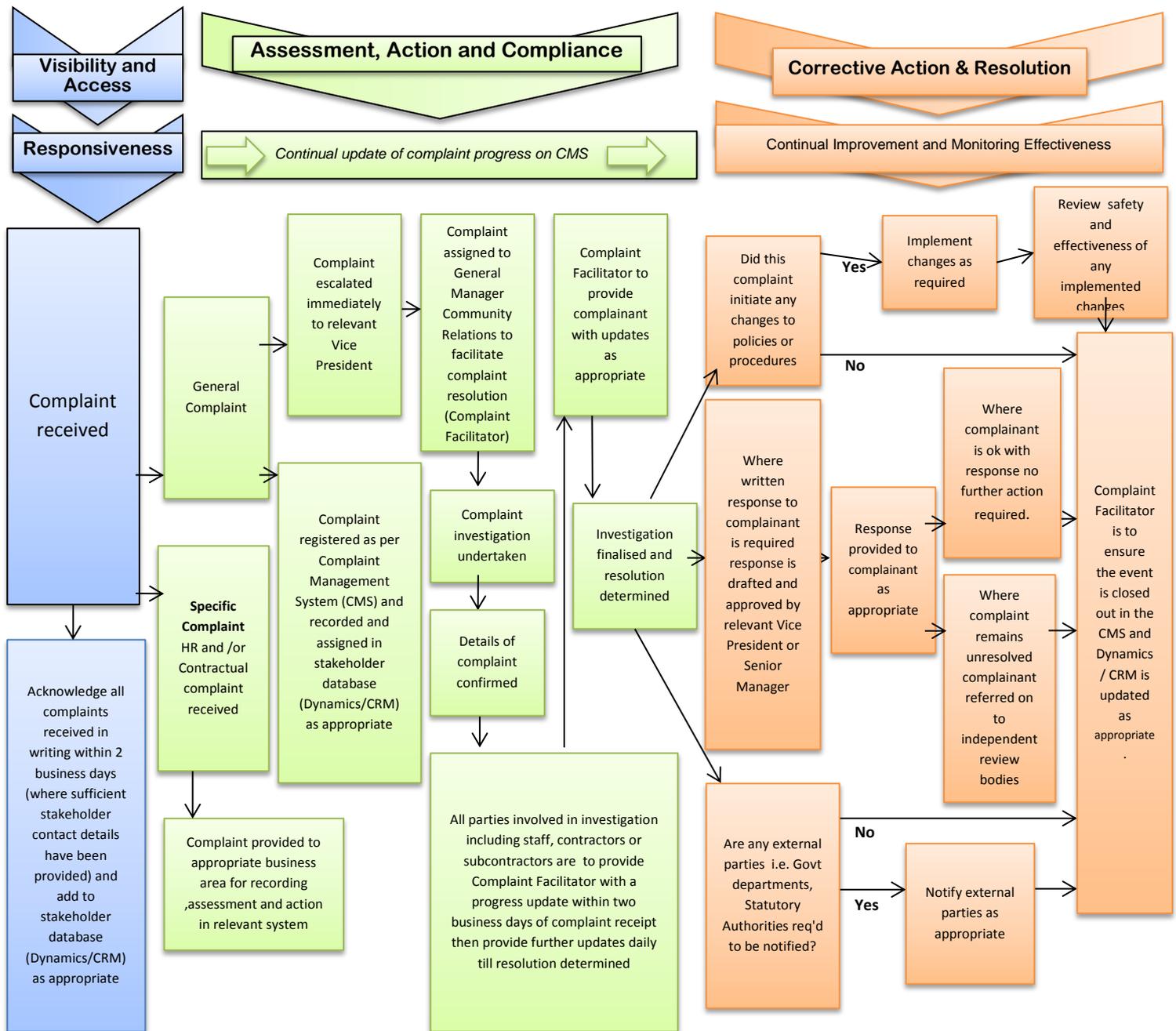


*\*The complaint has specific contractual or human resource requirements and is not within the scope of this policy.*

*\*\*If the complaint is assessed as a 'specific complaint' details entered should be kept to a minimum with only sufficient details to identify the individual complaint and with regard to the privacy of both the complainant and subject of the complaint.*

13. Appendix B: Arrow Energy Complaints and Compliance Reporting

**Arrow Energy Complaints and Compliance Reporting - Jan 2015**



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