

## Policy Statement

Castor Vali values the opinion and feedback of its employees, contractors and clients and is committed to improving service quality in response to feedback, suggestions, complaints or service issues.

We believe that our superior levels of customer service provide us with a competitive advantage, and as such we are continuously seeking ways to improve our service quality.

This process has been writing to comply with the Grievance Procedures highlighted in the International Code of Conduct (<https://icoca.ch/en>). It provides a publicly accessible mechanism to report and investigate any alleged shortfall in our services or any alleged misconduct or illegal activity.

## Scope of the Policy

This policy applies to all aspects of the company's service, policies and procedures. All employees and contractors are required to comply with this policy when dealing with complaints and if required complaint escalation.

## Organisational Commitment

Castor Vali operates a very open and accessible operational structure. This structure allows decisions requiring executive level input to take place quickly and efficiently, streamlining the service to our Clients.

All complaints and service issues will be thoroughly investigated and documented with all parties involved. Clear and accurate communication is central to effective resolution.

Complaints should be made in writing, initially to the member of staff concerned or can be made direct to senior management. Receipt of the complaint will be acknowledged pending investigation.

Information will be requested regarding who is making the complaint together with the nature of the complaint.

Castor Vali expects staff and contractors at all levels to be committed to fair, effective and efficient complaint handling. The following table outline the nature of the commitment expected from staff and contractors and the way that commitment should be implemented.

Who	Commitment	How
Management Team	Promote a culture that values complaints and their effective resolution	<p>Report publicly on Castor Vali's complaint handling</p> <p>Provide adequate support and direction to key staff responsible for handling complaints</p> <p>Regularly review reports about complaint trends and issues arising from complaints</p> <p>Encourage all staff and contractors to be alert to complaint and assist those responsible for handling complaints to resolve them promptly</p> <p>Encourage staff and contractors to make recommendations for system improvements</p> <p>Support recommendations for service, staff and complaint handling improvements arising from the analysis of complaint data</p>
Manager responsible for complaint handling	Establish and manage our complaint management system	<p>Comply with this policy and its associated procedures</p> <p>Implement changes arising from individual complaints and from the analysis of complaint data as directed by management.</p> <p>Provide regular reports to the Senior Management Team (SMT) on issues arising from complaint handling work</p> <p>Ensure recommendations arising out of complaint data analysis are canvassed with the Managing Director and senior management team and implemented where appropriate</p> <p>Keep informed about best practice in complaint handling</p> <p>Encourage all staff and contractors to be alert to complaints and assist those responsible for handling complaint resolve them promptly</p> <p>Encourage all staff and contractors to provide suggestions on ways to improve the organisations complaint management system</p>
All staff/contractors	Understand and comply with Castor Vali's complaint	Treat all people with respect, including people who make complaints

	handling practices	<p>Be aware of Castor Vali’s complaint handling policies and procedures</p> <p>Assist people who wish to make complaints access the Castor Vali’s complaints process</p> <p>Be alert to complaints and assist staff handling complaints resolve matters promptly</p> <p>Provide feedback to management on issues arising from complaints</p> <p>Implement changes arising from individual complaints and from the analysis and evaluation of complaint data as directed by management.</p>
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## Terms and Definitions

### Complaint

Expression of dissatisfaction made to or about Castor Vali, our service, staff/contractors or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.

A complaint covered by this Policy can be distinguished from:

- staff grievances
- responses to requests for feedback about the standard of our service provision [see the definition of ‘feedback’ below]
- reports of problems or wrongdoing merely intended to bring a problem to our notice with no expectation of a response [see definition of ‘feedback’]
- service requests [see definition of ‘service request’ below]

### Dispute

An unresolved complaint escalated either within or outside of our organisation.

### Feedback

Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about us, about our services or complaint handling where a response is not explicitly or implicitly expected or legally required.

### Service request

The definition of service request includes:

- Requests for approval
- Requests for action
- Routine enquiries about Castor Vali’s business
- Requests for the provision of services and assistance
- Reports of failure to comply with laws
- Requests for explanation of policies, procedures and decisions.

## **Grievance**

A clear, formal written statement by an individual staff member/contractor about another staff member/contractor or a work related problem

## **Facilitate complaints**

### **People Focus**

Castor Vali is committed to continual improvement; this includes seeking and receiving feedback and complaints about our services, systems, practices and procedures.

Any concerns raised in feedback or complaints will be dealt with within a reasonable timeframe.

People making complaints will be:

- Provided with information about our complaint handling process
- Listened to, treated with respect and actively involved in the complaint process where possible and appropriate, and
- Provided with reasons for our decision(s) and any options for redress or review.

### **No detriment to people making complaints**

Castor Vali will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf. We actively encourage openness and criticism, so we will support any person who is making a complaint in good faith. We will not tolerate any form of detrimental treatment or retaliation against the person raising the issue.

### **Anonymous complaints**

We accept anonymous complaints and will carry out an investigation of the issues raised where there is enough information provided.

### **Accessibility**

Castor Vali will ensure that information about how and where complaints may be made to or about us is well publicised. We will ensure that our systems to manage complaints are easily understood and accessible to everyone, particularly people who may require assistance.

If a person refers or needs another person or organisation to assist or represent them in the making and/or resolution of their complaint, we will communicate with them through their representative if this is their wish. Anyone may represent a person wishing to make a complaint with their consent (e.g. advocate, family member, legal or community representative, member of Parliament, another organisation).

## **Response to complaints**

### **Early resolution**

Where possible, complaints will be resolved at first contact with Castor Vali.

### **Responsiveness**

We will promptly acknowledge receipt of complaints.

We will assess and prioritise complaints in accordance with the urgency and/or seriousness of the issues(s) raised. If a matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately.

We are committed to managing people's expectation, and will inform them as soon as possible, of the following:

- The complaints process
- The expected timeframes for our actions
- The progress of the complaint and reasons for any delay
- Their likely involvement in the process, and
- The possible or likely outcome of their complaint.

## **Objectivity and fairness**

We will address each complaint with integrity and in an equitable, objective and impartial manner.

We will ensure that the person handling a complaint is different from any staff member whose conduct or service is being complained about.

Conflicts of interest, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

## **Responding flexibly**

Our staff and contractors are empowered to resolve complaints promptly and with as little formality as possible. We will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.

We will assess each complaint on its merits and involve people making complaints and/or their representative in the process as far as possible.

## **Confidentiality**

We will protect the identity of people making complaints where this is practical and appropriate.

Personal information that identifies individuals will only be disclosed or used by Castor Vali as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

## **Manage the parties to a complaint**

### **Complaints involving multiple organisations**

Where a complaint involves multiple organisations, we will work with the other organisation(s) where possible; to ensure that communication with the person making a complaint and/or their representative is clear and coordinated.

Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint.

Where a complaint involves multiple areas within Castor Vali, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.

We take complaints not only about the actions of our staff but also the actions of service providers.

### Complaints involving multiple parties

When similar complaints are made by related parties we will try to arrange to communicate with a single representative of the group.

### Empowerment of staff

All staff managing complaints are empowered to implement our complaint management system as relevant to their role and responsibilities.

Staff are encouraged to provide feedback on the effectiveness and efficiency of all aspects of our complaint management system.

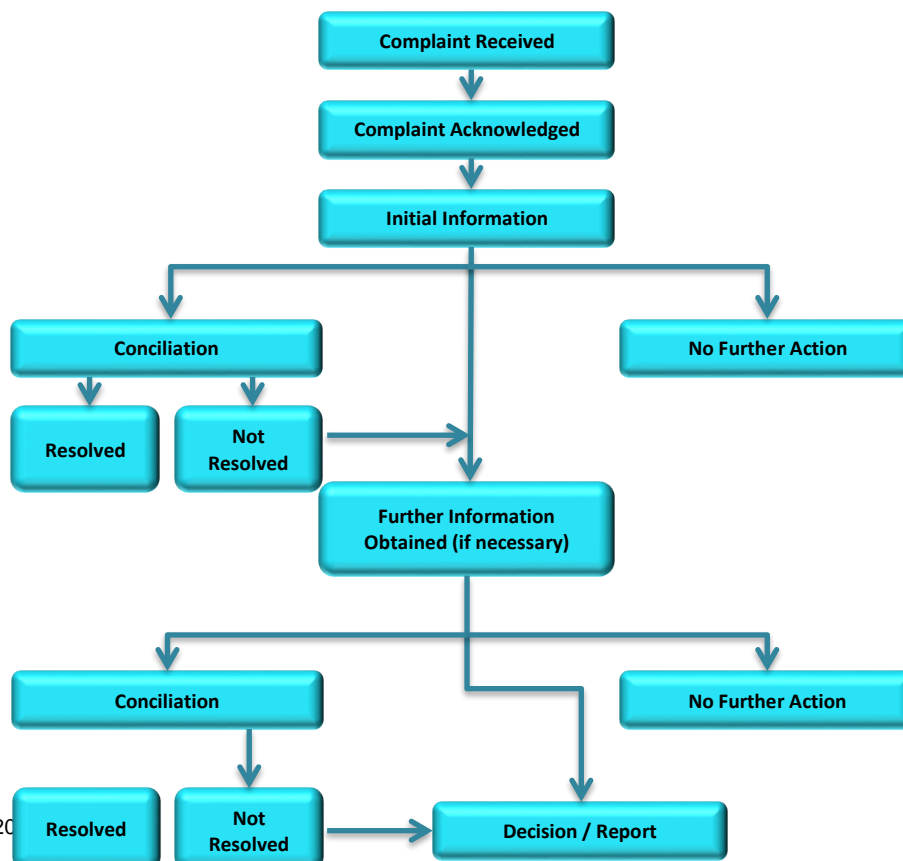
### Managing unreasonable conduct by people making complaints

We are committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time our success depends on:

- Our ability to do our work and perform our functions in the most effective and efficient way possible
- The health, safety and security of our staff and contractors, and
- Our ability to allocate our resources fairly across all the complaints we receive.

When people behave unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work. As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same in accordance with this policy.

### Complaint Management Process





When responding to complaints, staff should act in accordance with our complaint handling procedures as well as any other internal documents providing guidance on the management of complaints. Staff should also consider any relevant legislation and/or regulations when responding to complaints and feedback.

The key stages in our complaints management system are set out below:

## Receipt of complaint

Unless the complaint has been resolved at the outset, we will record the complaint and its supporting information. We will also assign a unique identifies to the complaint file.

The record of the complaint will document:

- The contact information of the person making a complaint
- Issues raised by the person making a complaint and the outcome(s) they want
- And other relevant information and
- Any additional support the person making a complaint requires.

## Acknowledgement of complaint

We will acknowledge receipt of each complaint promptly and preferably within 1 working day.

Consideration will be given to the most appropriate medium (e.g. email, letter) for communicating with the person making a complaint.

## Initial assessment and addressing of complaints

### Initial assessment

After acknowledging receipt of the complaint, we will confirm whether the issue(s) raised in the complaint is/are within our control. We will also consider the outcome(s) sought by the person making a complaint and. Where there is more than one issues raised, determine whether each issues needs to be separately addressed.

When determining how a complaint will be managed, we will consider:

- How serious, complicated or urgent the complaint is#
- Whether the complaint raised concerns about people's health and safety
- How the person making the complaint is being affected
- The risks involved if resolution of the complaint is delayed and
- Whether a resolution required the involvement of other organisation.

### Addressing complaints

After assessing the complaint, we will consider how to manage it. To manage a complaint we may:

- Give the person making the complaint information or an explanation
- Gather information from the person or area that the complaint is about, or
- Investigate the claims made in the complaint
- If necessary we will cooperate with any official or public investigation

- We will take any appropriate disciplinary action, which could include termination of employment, in cases of gross misconduct or unlawful behaviour.

We will keep the person making the complaint up to date on our progress, particularly if there are any delays. We will also communicate the outcome of the complaint using the most appropriate medium. Which actions we decide to take will be tailored to each case and take into account any statutory requirements.

We will ensure that outcomes are properly implemented, monitored and reported to the complaint handling manager and/or senior management.

## Communicating Results

Following consideration of the complaint and any investigation into the issues raised, we will contact the person making the complaint and advise them:

- The outcome of the complaint and any action we took
- The reason(s) for our decision
- The remedy or resolution(s) that we have proposed or put in place, and
- Any options for review that may be available to the complainant, such as an internal review, external review or an appeal.

This information may also be shared with relevant parties and, where appropriate, with competent authorities on request.

## Record Keeping

We will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis. We will keep records about:

- Specific details on the allegation or complaint
- How we managed / investigated the issue
- Any outcome(s) or findings from the investigation (including whether it or any aspect of it was substantiated), any recommendations or action points made to address problems identified and any decisions made on those recommendations, and
- Any disciplinary measures taken.

## Accountability and learning

Any complaint and the results of any investigation will be formally presented and closely reviewed by senior management personnel. Analysis will be undertaken to monitor trends, measure the quality of our customer service and make improvements.

Information will be provided to Castor Vali's MD and senior management for review.

## Monitoring of the complaint management system

We will continually monitor our complaint management system to:

- Ensure its effectiveness in responding to and resolving complaints, and
- Identify and correct deficiencies in the operation of the system.



## **Continuous improvement**

We are committed to improving the effectiveness and efficiency of our complaint management system. To this end, we will:

- Support the making and appropriate resolution of complaints
- Regularly review the complaints management system and complaint data, and
- Implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.

Signed by: Steve Grant  
Group Managing Director  
Castor Vali Ltd



This policy is reviewed by the CV Senior Management Team in accordance with the company's Management Review Schedule.