



## **Belkin Policies**

Complaints Handling Policy for  
Australia/New Zealand (ANZ)



**Name of Policy:** Complaints Handling Policy and Procedure

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## PURPOSE & SCOPE

This document sets out Belkin Limited's requirements in relation to Customer Complaints Handling.

## DOCUMENT OWNER

This document is owned by the Managing Director, and the Compliance Officer. Any questions should be discussed with the Managing Director or Compliance Officer.

## REVIEW DATE

This Policy will be reviewed, and any updates made on or by 15 March 2019, and annually thereafter.

## DEFINITIONS

**Customer:** Belkin recognises a customer to be any of the following:

- End User Consumer
- Retail Reseller
- Wholesale Reseller
- Distribution/Channel Partner
- Supplier

**Complaint(s):** Expression of dissatisfaction made by the public or Customer about any aspect of the product or service provided by Belkin, including behavior or decisions of staff, practices, policies and procedures.

## POLICY

### 1. POLICY

Belkin Limited is committed to handling Complaints in a clearly defined, effective and expeditious manner.

Our values and way of working foster a culture that:

- treats Customers with respect by acknowledging their right to complain and have Complaints handled professionally;
- actively solicits and acts on Customer feedback; and
- acknowledges that a Complaint received gives Belkin Limited an opportunity to maintain confidence in our brand.

Any person or organisation who has any concerns about inappropriate or improper conduct<sup>1</sup> or non-compliance with Belkin Limited policies, procedures or applicable laws is invited to lodge a Complaint which will be dealt with in accordance with this Complaints Handling Policy and Procedure.

Belkin Limited's Compliance Officer is responsible for managing the handling and registration of Complaints. Belkin Limited is committed to the principles embodied in the Australian Standard for Complaints handling<sup>2</sup>.

**Remember – handling Complaints is everyone’s job.** Everyone working within Belkin Limited must understand this Complaints Handling Policy and Procedure. If you do not understand this Policy or if you have any questions, please contact the Compliance Officer.

<sup>1</sup> Improper conduct may indicate 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 Belkin Limited employees; substantial risk to the environment; or substantial mismanagement of Belkin Limited Resources.

<sup>2</sup> The current Australian Standard is AS/ISO 10002-2006 – Customer Satisfaction – Guidelines

**NOTE:** Where the Complaint alleges improper conduct or anticompetitive conduct – for example, Complaints relating to:

- fraud;
- corruption;
- unlawful activity;
- discrimination, harassment, vilification or victimisation;
- an unresolved Customer Complaint under the Complaints Handling Policy and Procedure;
- anticompetitive conduct;
  - Belkin Limited communications with competitors regarding:
    - prices charged to customers or resellers or for the collection of waste from customers;
    - pricing or the term of tenders;
    - the supply of goods or services to particular areas or regions;
    - winning or losing customers;
  - restrictions being imposed on customers; or
- conduct that is otherwise a breach of the Belkin Limited Code of Conduct,

notify the Compliance Officer immediately, as the Complaint will be dealt with in accordance with the ***Whistleblower and Improper Conduct Policy and Procedure***.

Alternatively, if you/Belkin staff have any queries, concerns about, or wish to make allegations about improper conduct or anticompetitive conduct, you may use the procedures set out in the ***Whistleblower and Improper Conduct Policy and Procedure*** or you may contact the independent external service provider engaged by Belkin Limited to take Complaints alleging such conduct (Ethicspoint).

## 2. COMPLAINTS HANDLING PROCESS

Belkin Limited may receive a Complaint via a number of channels including:

- by phone on:

Australia	1300 235 546	(Customer Advocacy Escalations)
Australia	1800 235 546	(Belkin Technical & Customer Support)
Australia	1800 605 971	(Linksys Technical & Customer Support)
New Zealand	0800 880 334	(Customer Advocacy Escalations)
New Zealand	0800 235 546	(Belkin Technical & Customer Support)
New Zealand	0800 441 528	(Linksys Technical & Customer Support)
International	+612 4350 4600	(Belkin ANZ Head Office)
  
- via the website: [www.belkin.com/au](http://www.belkin.com/au) or [www.linksys.com/au](http://www.linksys.com/au), in particular the 'Support' tab and/or subsequent 'Contact Us' link.
  
- via Ethicspoint: [www.ethicspoint.com](http://www.ethicspoint.com)
  - Australia via phone: Follow the two steps below
    1. (Optus Toll Free Call) 1800 551 155
    - (Telstra Toll Free Call) 1800 881 011
  - 2. At the prompt dial 888 233 8952
  - New Zealand via phone: Follow the two steps below
    1. (Toll Free Call) 000 911
    2. At the prompt dial 844 637 6758
  
- via email at [acce@belkin.com](mailto:acce@belkin.com).

In each case, the Complaints resolution process outlined below should be followed.

- a. The person who first receives the Complaint will:
  - Immediately acknowledge the Complaint (either during the phone call from the Customer or by way of email or fax);
  - Record the Complaint in the Complaints Register giving the Complaint a unique identification case number of which will be provided to the Customer for reference purposes;
  - Gather detail about the Customer and the Complaint as set out in the Complaints Register (see Annexure A) in order to properly investigate and respond; and
  - If he/she is able to resolve the issue on the spot, do so and record how the matter was resolved and change the status of the matter in the Complaints Register to 'resolved'.
  
- b. If the person who first receives the Complaint is not able to resolve the issue on the spot, he/she must:
  - Escalate the Complaint to his/her Manager, or to the relevant business division; and
  - Contact the Customer within 24 hours to advise the timing of the next communication or expected timing of resolution.
  
- c. Within 24 hours, the Manager or representative at the relevant business division must take steps to resolve the Complaint. If the Complaint cannot be resolved by that representative within this period, the Complaint must be escalated to the Customer Advocacy Supervisor (**Supervisor**).



- d. Within a further 5 working days or a longer period agreed with the Customer, the Supervisor will endeavour to resolve the Complaint. If the Supervisor cannot resolve the Complaint within the further 5 working days, or the period agreed with the Customer, the Complaint must be escalated to the Customer Experience Manager/Compliance Officer.
- e. Within a further 3 working days or a longer period agreed with by the Customer, the Customer Experience Manager/Compliance Officer must endeavor to resolve the Complaint. If the Customer Experience Manager/Compliance Officer cannot resolve the Complaint within this period, the Complaint must be escalated to the Managing Director, ANZ and the Belkin Legal Department.

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

- If at any point a Customer threatens legal proceedings, a regulator is involved or is likely to become involved, the Complaint must be referred to the Compliance Officer and the Belkin Legal Department.

### 3. SOLUTIONS AND REMEDIES

A number of remedies are available to address Customer Complaints which reflect good industry practice; are fair and reasonable in the particular circumstances; and meet Belkin Limited legal obligations.

Options include:

- Refund or replacement product/services
- Information, explanation or technical assistance
- An apology
- Compensation for the losses attributable to fault on the part of Belkin

Discuss the appropriate options with the Compliance Officer and/or the Belkin Legal Department.

#### **What if Belkin is not at fault?**

If, after a careful investigation, it is determined that Belkin is not at fault or liable for the issues about which the Customer is complaining, where appropriate, a carefully worded letter should be sent to the Customer explaining our position. This must be approved by the Compliance Officer, or the Belkin Limited Legal Department.

#### **What if the Complaint is not resolved to the Customer's satisfaction?**

If the Customer rejects Belkin's proposed decision/action, the Customer should remain open in the Complaints Register. The Customer's rejection should be recorded and the Customer should be informed of alternate forms of external redress available, where mediation of complaints may be conducted.

Again, the person who receives the Complaint or the Belkin representative dealing with the Complaint at the time must speak with the Complaints Officer or the Belkin Legal Department prior to taking this step.

External bodies that Customers may pursue the Complaint are the Civil and Administration Tribunal or Magistrates Court located in the State/Territory in which they reside. The details of these bodies are set out in the schedule below.

State / Territory	Tribunal / Magistrates Court	Website
New South Wales	NSW Civil and Administrative Tribunal (NCAT)	<a href="http://www.ncat.nsw.gov.au/">http://www.ncat.nsw.gov.au/</a>
Victoria	Victorian Civil and Administrative Tribunal (VCAT)	<a href="https://www.vcat.vic.gov.au/">https://www.vcat.vic.gov.au/</a>
Queensland	Queensland Civil and Administrative Tribunal (QCAT)	<a href="https://www.qcat.qld.gov.au/">https://www.qcat.qld.gov.au/</a>
Australian Capital Territory	ACT Civil and Administrative Tribunal (ACAT)	<a href="https://www.acat.act.gov.au/">https://www.acat.act.gov.au/</a>
Northern Territory	Northern Territory Civil and Administrative Tribunal (NTCAT)	<a href="http://www.ntcat.nt.gov.au/">http://www.ntcat.nt.gov.au/</a>
South Australia	South Australia Magistrates Court	<a href="http://www.courts.sa.gov.au/Pages/default.aspx">http://www.courts.sa.gov.au/Pages/default.aspx</a>
Tasmania	Magistrates Court of Tasmania	<a href="https://www.magistratescourt.tas.gov.au/about_us/civil/minor_civil_claims">https://www.magistratescourt.tas.gov.au/about_us/civil/minor_civil_claims</a>
Western Australia	Magistrates Court of Western Australia	<a href="https://www.magistratescourt.wa.gov.au/">https://www.magistratescourt.wa.gov.au/</a>

#### 4. COMMUNICATION AND RECORDING

All Complaints must be recorded in the Complaints Register by the person who receives the Complaint (usually the call center team). If a matter is escalated, the person to whom the matter is escalated must ensure that the Register is maintained and updated.

The Complaints Register is a Customer Relationship Management (CRM) software tool called Salesforce Service Cloud.

## 5. COMPLAINTS HANDLING PRINCIPLES

Belkin Limited will handle Complaints in accordance with the following principles:

<b>Commitment</b>	Belkin Limited is committed to efficient and fair resolution of Complaints.
<b>Confidentiality</b>	<p>The identity of a Customer is to be recorded in the Complaints handling system for the purpose of dealing with the complaint. However, all Complaints handling will remain confidential and details therein only communicated with appropriate escalation points.</p>
<b>Fairness</b>	<p>Belkin Limited recognises the need to be fair to the Customer and to deal with all Complaints in an impartial manner.</p> <p>No decision and subsequent action will be taken until the Complaint has been appropriately investigated.</p> <p>If a Complaint relates to the conduct of a specific person/Belkin staff member, the person the subject of the Complaint has a right to know all the allegations made against them, as well as being given the opportunity to fully respond. Such Complaints are likely to be dealt with under the <i>Whistleblower and Improper Conduct Policy and Procedure</i>.</p> <p>There may also be circumstances where it is inappropriate for a particular person to deal with a Complaint, for example if the Complaint is about that person or associated persons. In such cases, the matter will be referred to another appropriate Manager.</p> <p>Belkin Limited will ensure that a person making a Complaint, or any related party or witness is not victimised in any way.</p>
<b>Responsiveness</b>	All Complaints will be dealt with in a timely and courteous manner.
<b>Resources</b>	Belkin Limited will allocate sufficient resources for Complaints handling and resolution.
<b>Visibility &amp; Access</b>	This Policy will be distributed to all employees and is available on its internal site and on its website at <a href="http://www.belkin.com/au">www.belkin.com/au</a> . This Policy will be distributed to all new staff and contractors as part of the induction process and will be referred to during relevant ongoing compliance training.
<b>Assistance</b>	Belkin Limited's Compliance Officer can assist with the formulation and lodgment of Complaints if required.
<b>Remedies</b>	Appropriate remedies for Complaints will be determined and implemented in accordance with this Policy. If the Customer believes that this Policy has not been followed properly, or the outcome is unacceptable, the Customer may contact the Compliance Officer or Managing Director for a review.



<b>Data Collection</b>	All Complaints and records of outcomes will be recorded in a Complaints Register. Any Complaint raised against an employee of Belkin Limited will be kept on official HR records. Please refer to the Human Resources department for information on the <i>Discipline and Termination of Employee's Policy</i> .
<b>Review &amp; Audit</b>	Belkin Limited 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).
<b>Accountability</b>	Belkin Limited's Compliance Officer will report on the operation of this Policy to the Belkin Management Team on an annual basis.