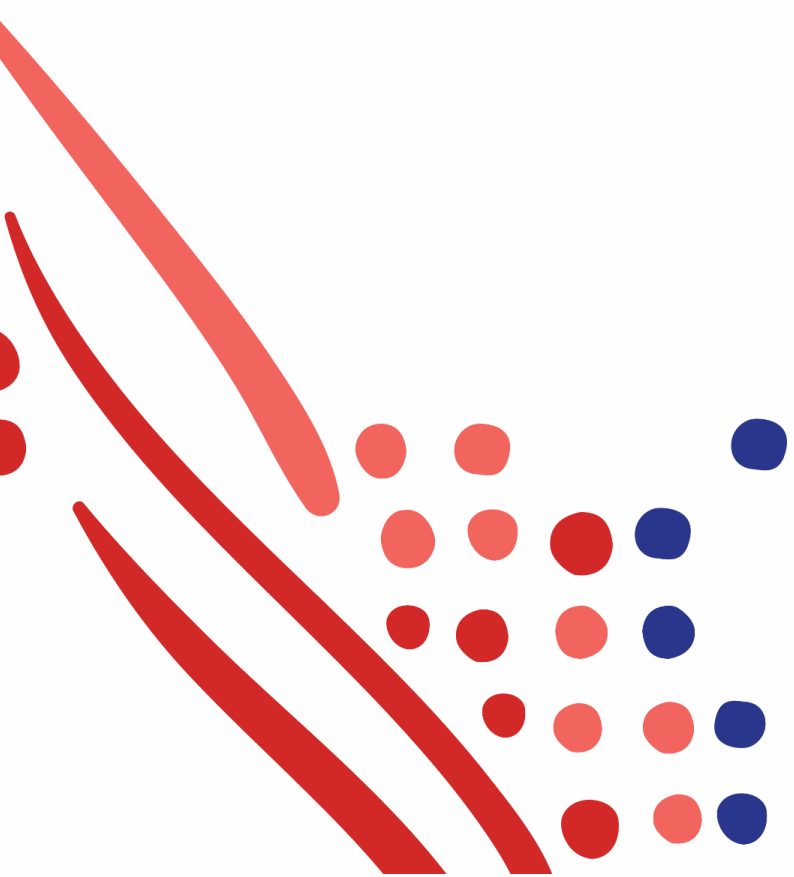


Complaints Handling & Disputes Resolution Policy



Date: 01/10/2021



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Confidentiality

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Background

As an AFSL holder (no. 312078), Automatic Data Processing Limited (ADP) is required to comply with certain criteria in respect of complaints and dispute handling as part of the license conditions.

This policy has been written to comply with the requirements of the Australian Financial Services legal and regulatory framework and ASIC Regulatory Guide 271.

Coverage

Although ADP's AFSL is relevant to Electronic Payment Services ("EPS") only, this policy is to apply generally to the ADP ANZ business for consistency in approach towards complaints handling.

Outside of EPS related complaints and disputes, where a documented complaint or issue escalation process is in existence as part of standard operating procedure, these should be followed consistently with the procedures outlined in this document.

Disputes Strategy

Automatic Data Processing Limited (ADP) considers effective and efficient complaint management essential to establishing and maintaining harmonious and productive relationships with our clients.

ADP's aim is to identify, investigate and resolve complaints using a fair, transparent, objective and confidential process that achieves resolution in a timely manner at the lowest possible level.

The accountability for this Policy sits with the Compliance Officer and responsibility with the Risk and Compliance Committee. Associates of ADP are required to comply with this Policy at all times.

Information that is captured by this process will be used to instigate preventative strategies to limit the possibility of recurrence and to initiate targeted improvement through the relevant teams.

ADP ensures that adequate resources are in place to enable this policy to operate effectively and efficiently including the regular provision of training on this policy for all relevant Associates. ADP will keep training records and ensure that these records are updated as required.

This process is a mechanism through which complaints can be lodged, investigated and resolved. This policy details how complaints follow a process from Registration, to the two levels of review being at team leader level and then Internal Dispute Resolution Committee (IDRC). A third level, applicable only in relation to EPS, is a review to External Dispute Resolution (EDR) at the Australian Financial Complaints Authority (AFCA).

Definitions

A **complaint** is defined as an expression of dissatisfaction with ADP's products or services, procedures, fees, Associates, quality of service provided, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected or legally required.



Accessibility

ADP's Complaints Handling and Dispute Resolution process has been designed to be easily accessible to all complainants.

ADP provides readily accessible information about our Complaints Handling & Dispute Resolution process via this policy which is also available on its webpage and in our communications with our clients who have raised a complaint.

Timeframes

ADP will follow processes to enable the timeframes noted in each stage are complied with, but ensure that the Complaints Handling and Dispute Resolution process does not in total exceed 30 days. This means that Stages 1 and 2 assessment must be completed and communicated to the complainant within 30 days of the complaint made.

Should the complaint be deemed as urgent, ADP will give priority to the complaint and complete its assessment promptly.

The pursuit of best practice procedures should result in timeframes shorter than 30 days regularly being achieved.

For the purposes of clarity, days referred to are calendar days unless otherwise stated.

Communication

This policy will be communicated to all client facing Associates.

ADP is flexible in the methods of taking complaints from clients, this includes being able to make complaints verbally or in writing by email, post and/or social media channels.

Updates on progress of the complaint and where we advise the complainant of a decision at Stage 1 or Stage 2 of the Complaints and Disputes Process, we will do so over the telephone in the first instance and confirm the discussion and decision formally via eService, by way of an email or letter sent to the complainant at the address they have provided to us.

ADP keeps an Internal Disputes Resolution (IDR) file within eService and attaches documents provided to ADP by the Client in the course of a complaint. ADP will immediately initiate action to correct any record if there are errors made in recording or dealing with a complaint.

Confidentiality of Complaints Handling & Dispute Resolution Process

ADP will observe strict confidentiality at all times throughout the complaints handling process in accordance with our privacy policy.

Investigation of Complaints and Disputes

After a complaint is lodged, the complainants will be notified of the contact details of the person assigned to the complaint.

We will advise complainants that they may submit further information to support their view as part of the complaint process, which can be provided via e Service (preferred approach) or post.

ADP will only ask for and rely on information relevant to the complaint when making a decision on the complaint.



An ADP Associate who is the subject of a complaint will not be involved in investigating or making a decision relating to the complaint.

Complaint Handling and Dispute Resolution Process Stages

ADP's Complaints Handling and Dispute Resolution process comprises of four stages:

- Registration and Acceptance
- Stage 1 Complaint Handling and Dispute Resolution process
- Stage 2 Complaint Handling and Dispute Resolution process
- Stage 3 External Dispute Resolution (EDR) (applicable only in relation to EPS)

A summary of this process is shown in Annexure A.

Registration and Acceptance

All complaints received by ADP, which are not resolved at the first contact point with the client, are to be recorded in the Complaints Register (by raising a complaints SR on eService) by the Associate that receives the complaint.

In case the complaint cannot be resolved within **5 days** of receiving it, a Manager of the department which has received the complaint is to manage, investigate and attempt to resolve the complaint, as the designated Disputes Resolution Officer ("DRO"). The DRO will clearly record details for each stage of the Complaints Handling and Dispute Resolution process in the Complaints Register via eService. The DRO may seek the assistance or involvement of other ADP departments as necessary to investigate the complaint.

The DRO must contact the complainant within **1 day** to acknowledge the escalation of their complaint to the DRO and provide details of relevant timeframes, and will offer the complainant an opportunity to provide any further information. The DRO must provide the complainant a copy of this policy.

The DRO may in discussing the complaint with the complainant, resolve the complaint over the telephone with the complainant. Where the complaint is resolved during their discussion, the resolution of the complaint will be recorded in the Complaints Register via eService by the DRO with a confirmation of complaint resolution email or letter sent to the complainant.

Stage 1 Complaint Handling and Dispute Resolution process

ADP's Stage 1 Complaints will be managed by the relevant DRO of the department which has received the complaint.

ADP will aim to resolve the complaint within **5 days** of the date of receipt of the complaint, provided we have all necessary information and have completed any investigation required. If we do not have all the necessary information, the DRO will make contact with the complainant to discuss and advise further information is required to enable the complaint to be investigated. If the DRO is unable to resolve the complaint **within 14 days** because the DRO does not have all necessary information or has not completed the investigation, the DRO will inform the complainant as soon as possible, and attempt to agree a reasonable alternative timeframe. If an alternative timeframe cannot be agreed, DRO will inform the complainant of their right to proceed directly to ADP's Stage 2 Complaint Handling and Dispute Resolution process.

The DRO will aim to keep the complainant informed of progress at least every 7 days.



Where the DRO has assessed the matter during stage 1, the DRO will respond in writing and inform the complainant of:

1. the decision in relation to the complaint;
2. the reasons for the decision;
3. their right to take their complaint to Stage 2 if the decision at Stage 1 does not resolve the complaint to the complainant's satisfaction; and
4. ONLY FOR EPS product related complaint - if they are not satisfied with the decision after Stage 2, the complainant may wish to refer their complaint to Stage 3 - AFCA.

Stage 2 Complaint Handling and Dispute Resolution process

A complainant can access Stage 2 if:

1. the complainant advises they are not satisfied with the Stage 1 decision OR the complaint is not resolved in Stage 1 within 14 days;
2. AFCA (applicable only in relation to EPS) notifies ADP of receipt of a complaint that has not been advised or otherwise investigated in the Stage 1 process.

When a complaint is progressed to Stage 2, the Complaints Register will need to be updated by the DRO. The DRO must immediately refer the complaint to the Internal Dispute Resolution Committee (IDRC).

Where a complaint has progressed to Stage 2 but has not been previously investigated, the DRO will manage and investigate the complaint and assist the IDRC to investigate and resolve the complaint.

Investigation and Reporting to IDRC

The IDRC shall aim to investigate and resolve the complaint during Stage 2 within **9 days** of the relevant complaint being referred to the IDRC.

The DRO will prepare a brief for the complaint to allow the IDRC to investigate and make a decision on the complaint. This brief will be provided to IDRC members no later than 3 business days before the relevant IDRC meeting.

Any communication with the complainant during Stage 2 will continue between the DRO and complainant, and DRO will keep the complainant and Complaints Register updated.

Conduct of IDRC meetings

The IDRC shall:

- sit and review the Stage 2 complaints as required.
- comprise of 2 Senior Leadership Team members and the DRO;
- be chaired by an individual nominated by the members of the IDRC as chair. The role of chairperson may be rotated from member to member; but the role of the chairperson cannot be taken by the DRO;
- have its meetings conducted in person and/or via audio/visual media;
- a quorum of the IDRC shall be 2 members;
- review all aspects of the dispute and to make a decision regarding the merits of the dispute and any potential outcome that may be offered. The IDRC may make a decision based on likely AFCA Outcomes given AFCA



terms of reference and circulars (applicable only in relation to EPS), commercial considerations and whether they consider ADP has breached any standards or obligations;

- a decision shall be made by a majority of the members present at the IDRC meeting;
- document its findings and decisions in the form of minutes taken by the DRO.

The DRO or their delegate shall:

- communicate the findings and decisions of the IDRC over the telephone and confirm the decision in writing either eService, email or by post **no later than 30 days of receipt of the compliant** or **within 3 days** after the relevant IDRC meeting whichever is earlier ;
- Applicable only in relation to EPS: advise the complainant that if they are dissatisfied with the decision of the IDRC in Stage 2, they may refer the complaint to AFCA and provide the complainant with AFCA details via e-Service, email or post. AFCA can be contacted on : 1800 931 678 or info@afca.org.au.

Stage 3 - External Dispute Resolution (EDR) - applicable only in relation to EPS

ADP is a registered member of AFCA, an EDR Scheme approved by ASIC.

A determination made by AFCA is binding upon ADP in accordance with the AFCA Terms of Reference.

When an EDR request is received, the DRO will:

1. update the Complaints Register to reflect the change of status to EDR;
2. brief the Legal Director and in conjunction prepare a response to AFCA and liaise with AFCA accordingly;
3. advise the IDRC regarding any actions that must be taken by ADP in relation to the complaint; and
4. ensure complaint is closed at the correct AFCA fee level.

AFCA membership is managed by the Legal Director and any issues arising in respect to the membership are reported to the Risk & Compliance Committee.

ADP must provide ASIC with a written report within 2 business days if any changes have been made to the status of its EDR membership

Reporting to Risk & Compliance Committee

A Complaints Register is generated from eService and reported to the Risk & Compliance Committee on a monthly basis.

The DRO shall submit a report to the relevant SLT member for reporting to the Risk & Compliance Committee a summary of the Complaints Register and identifying any trends in complaints/disputes with root cause analysis (including but not limited to systemic issues) and make recommendations for training, process improvements, additional controls or other measures to the Risk & Compliance Committee for consideration.

Policy Review

This Policy will be reviewed annually by the Legal Director and the outcome of that review, together with any recommendations for revision to the Policy will be made to the Risk & Compliance Committee.

From time to time it may be necessary to make changes to this policy. Where changes occur, a formal communication will be issued as necessary to all relevant ADP Associates advising of the changes.



Annexure A - ADP Summary of Complaint Handling and Dispute Resolution Process Stages

If ADP has received a Client complaint that can't be resolved by the first contact point, the following process will be followed:

RECORD Complaint be recorded by ADP associate in Complaints Register via eService and if not resolved within **5 days**, the Dispute Resolution Officer ("DRO") will contact the Complainant **within 1 day** to inform that the complaint has moved to Stage 1 and will provide the Complainant with a copy of the ADP Complaints Handling and Disputes Resolution Policy.

STAGE 1 DRO to investigate and aim to resolve the complaint within **14 days** of receipt of complaint. Weekly status update to be provided to the Complainant. The DRO will advise the client of a decision, reasons and right for Complainant to take the complaint to Stage 2 if decision is not acceptable to the Complainant.. If the complaint is not able to be resolved within 14 days, an alternative time frame can be agreed between ADP and the Complainant.

STAGE 2 If the Complainant is not satisfied with the decision or the complaint is not resolved within 14 days in Stage 1, the DRO shall immediately refer the complaint to ADP's Internal Dispute Resolution Committee (IDRC) who will investigate to resolve the complaint. The IDRC will aim to resolve the complaint within **9 days** of being referred the complaint .

STAGE 3 (FOR EPS ONLY): If Client is not satisfied with outcome from IDRC, Client has option to refer the complaint to the Australian Financial Compliant Authority (AFCA). AFCA will manage the Dispute from this point. AFCA can be contacted on : 1800 931 678 or info@afca.org.au.



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