Dispute Resolution Policy

Compliance Policy | Global

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Replace all references to “the Company” with your organisation’s name.

Document Control

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Contents

1. Purpose

This Policy establishes the Company's framework for receiving, managing and resolving complaints about its products, services, staff and complaint handling. Its purpose is to ensure that every complaint is dealt with promptly, fairly, consistently and at no cost to the complainant, in line with ISO 10002:2018 and the G20/OECD High-Level Principles on Financial Consumer Protection, and in compliance with the complaint-handling requirements of applicable law in each jurisdiction in which the Company operates.

Effective dispute resolution is both a regulatory expectation and a source of business value. Complaints resolved early preserve customer relationships, prevent escalation to external bodies, and provide direct evidence of product, service and conduct weaknesses that the Company must identify and correct. This Policy therefore treats complaints as a core input to the Company's risk, compliance and product governance processes, not merely a customer-service activity.

This Policy is approved by the Board of Directors and is owned by the Chief Compliance Officer, who is accountable for its implementation, maintenance and annual review. It should be read together with the Company's Hardship Policy, Debt Collection Policy, Conduct Risk Policy, Product Governance and Distribution Policy, Issues and Incident Management Policy and Compliance Management Framework. This Policy also refers to a Customer Vulnerability Policy and a Customer Remediation Policy; each is a separate document that the Company must produce and maintain and neither forms part of the Company's existing policy suite.

2. Scope

This Policy applies to the Company and its subsidiaries, and to all directors, officers, employees, contractors and agents, including staff of outsourced service providers who receive or handle complaints on the Company's behalf. Where complaint handling is outsourced, the Company retains full accountability for compliance with this Policy and applicable law, and must impose equivalent obligations, service levels and audit rights on the service provider, consistent with the Company's Outsourcing Policy and the BCBS Principles for Operational Resilience.

This Policy covers all complaints, however expressed and through whatever channel received, including in person, by telephone, letter, email, web form, mobile application, and posts on a social media channel or account owned or controlled by the Company where the complainant is identifiable and contactable. It applies to complaints from customers, former customers, prospective customers, small businesses, guarantors and their authorised representatives, including financial counsellors, family members and legal advisers.

The following are outside the scope of this Policy and are handled under the policies indicated: employee grievances (the Company's Human Resources Policy); whistleblower disclosures (the Whistleblower Protection Policy, noting that a matter may be both a complaint and a protected disclosure and must then be handled under both); and requests for information or service that contain no expression of dissatisfaction. Where there is doubt as to whether a matter is a complaint, it must be treated as a complaint.

Jurisdictional application. This Policy states international best practice for complaints handling. The Company must map the requirements of this Policy to the complaint-handling, hardship, redress and reporting laws of each jurisdiction in which it operates, including any mandated maximum response timeframes, prescribed response content and EDR scheme membership. Where local law or a local regulator imposes a stricter or more specific requirement than this Policy, local law prevails and must be applied.

3. Definitions

Term	Definition
ADR	Alternative dispute resolution: the resolution of disputes outside the courts, including by an ombudsman, mediator, arbitrator or comparable independent body.
Complaint	An expression of dissatisfaction made to or about the Company, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required (consistent with ISO 10002:2018).
Complainant	A person or entity that makes a complaint, including a customer, former customer, prospective customer, small business, guarantor, or an authorised representative acting on any of their behalf.
Delay Notification	A written notification issued to a complainant before the applicable maximum internal complaint-handling timeframe expires, explaining the reasons for the delay, the revised expected response date, and the complainant's right to refer the complaint to the [external dispute resolution scheme / ombudsman], together with that body's contact details.
EDR	External dispute resolution: the resolution of a complaint by an [ombudsman, ADR scheme or comparable independent body] where internal dispute resolution does not

	resolve the matter or the maximum internal timeframe expires.
External Dispute Resolution Scheme	The [ombudsman, financial services complaints scheme or other ADR body] recognised or mandated in the relevant jurisdiction to resolve complaints against the Company, of which the Company is a member or to which it is otherwise subject.
Final Response	A written response to a complainant setting out the final outcome of the complaint at IDR, the reasons for the decision where the complaint is rejected in whole or part, the complainant's right to escalate to the External Dispute Resolution Scheme, and that scheme's contact details and any applicable referral deadline.
First-Contact Resolution	Resolution of a complaint to the complainant's satisfaction by the staff member who receives it, at or promptly after the initial contact, within that staff member's delegated authority.
Hardship Complaint	A complaint involving a request for relief from financial hardship, including a request to vary repayment terms or to postpone, suspend or cease collections or enforcement action.
Internal Dispute Resolution (IDR)	The Company's internal processes for receiving, acknowledging, investigating and resolving complaints, operated under the Dispute Resolution Policy and consistent with ISO 10002 on complaints handling.
Remediation	The structured programme of activity by which the Company identifies the customers affected by misconduct, a breach or a product design or distribution failure, notifies them, and restores them as nearly as possible to the position they would have been in had the failure not occurred, including through refunds, cancellation, replacement or compensation.
Root Cause Analysis	The structured identification of the underlying process, product, system, conduct or control failure that gave rise to a complaint, as distinct from its immediate symptom.
Small Business	A business meeting the size criteria for

	complaint or EDR eligibility in the relevant jurisdiction, or, absent a local definition, a business with fewer than [100] employees at the time the complaint is made.
Systemic Issue	An issue identified from a complaint, or from complaint trend analysis, that has affected, or has the potential to affect, more than one customer, product, service, channel or business unit.
Vulnerable Complainant	A complainant experiencing circumstances that create a heightened risk of harm or barriers to engaging with the complaints process, including financial hardship, domestic or family violence, elder abuse, serious illness, disability, low literacy, language barriers, remote location or bereavement.

4. Regulatory Framework

The key legislation, regulations and standards relevant to this document include (as amended from time to time):

Instrument / Standard	Relevance
ISO 10002:2018 Quality management — Customer satisfaction — Guidelines for complaints handling in organizations	The international benchmark for complaint-handling systems; supplies the complaint definition and the principles of accessibility, responsiveness, objectivity and accountability adopted by this Policy.
G20/OECD High-Level Principles on Financial Consumer Protection (2022)	Principle 12 requires accessible, affordable, independent, fair and timely complaint handling and redress, including internal mechanisms and recourse to independent redress bodies.
World Bank Good Practices for Financial Consumer Protection	Sets good-practice standards for internal complaint handling, complaint data reporting to supervisors and effective external ombudsman arrangements in financial services.
INFO Network — Fundamentals for Financial Services Ombudsman Schemes	Describes the independence, accessibility and fairness attributes of external dispute resolution schemes with which the Company must cooperate.
ISO 37301:2021 Compliance management systems	Positions complaint handling and the escalation of complaint-derived issues within the Company's compliance management system and compliance obligations register.
ISO 10003:2018 Guidelines for dispute	Provides guidance on the interface

End of preview

This is a preview extract. The complete document continues beyond the pages shown here.

The full document is supplied as a single, fully editable Microsoft Word (.docx) file immediately after purchase — including every remaining section, the definitions, the regulatory framework references and all appendices and templates.

Bracketed prompts such as [30 days] mark the points where your own thresholds, committee names and local regulatory references are inserted.