



## Complaints & Disputes Resolution Policy

### 1.1 Introduction

Maximum Energy Retail Pty Ltd (trading as **Circular Energy**) is dedicated to providing excellent customer service and it is important that our customers are satisfied with the service we provide.

However, in spite of our best efforts, there may be occasions when our service does not meet the high standards we set out for ourselves, or that you as a customer might reasonably expect of us.

This complaints and dispute resolution policy governs how we handle complaints you may wish to raise with us in these situations.

The objective of this policy is to embed an effective, fair and efficient complaint handling process.

This policy will be reviewed every 2 years or as necessary, with reference to the guiding documents, to reflect the rules and regulations as they apply to the needs of our customers.

In developing this policy, Circular Energy has adopted industry best practice and has aligned its customer complaints process with the Australian Standard AS ISO 10002-2006 '*Customer satisfaction – Guidelines for complaints handling in organizations*'.

### 1.2 Visibility

We will ensure that information about how to make complaints and how we will handle any complaint is well-publicised and easily available to customers, our employees and other interested parties by;

- making this policy freely available on our website;
- providing free copies of this policy on request;
- setting out our contact details in this policy, so that readers can contact us for further information or to raise a complaint;
- cross-referencing this policy in other Circular Energy documents, including our standard retail contracts and market retail contracts; and
- setting out the contact details for the Energy Ombudsman in each jurisdiction in which we operate in this policy and in other Circular Energy documents, including our standard retail contracts to facilitate the referral of complaints to the appropriate Energy Ombudsman, where necessary.

### 1.3 Accessibility

We will ensure that our complaints handling processes are easily accessible to all customers who wish to make a complaint, by:

- providing a range of methods through which complaints can be lodged, including online, by phone, email and post; and
- providing appropriate complaint lodgement arrangements and other support for customers with special needs, including the provision of interpreter services where necessary.



## 1.4 Responsiveness

We will respond appropriately to your complaint by:

- using best endeavours to respond to a customer's written enquiry or complaint within 5 business days by answering the enquiry or complaint or acknowledging its receipt and indicating how we will deal with the complaint or enquiry;
- otherwise writing to you within 5 business days to acknowledge receipt of your complaint;
- responding to a customer's telephone enquiry in accordance with our obligations under the law;
- recording your complaint in our customer management system;
- advising you of the period within which we expect to address your complaint;
- assigning your complaint to the relevant person at Circular Energy;
- addressing your complaint in a timely fashion, having regard to the nature of the complaint and the complexity of the relevant circumstances;
- tracking our progress in addressing your complaint in our customer management system;
- updating you as to our progress in addressing your complaint, and the period within which we expect to resolve the complaint including any anticipated delays in resolving the complaint.
- advising you of our proposed resolution of your complaint, or any other proposed outcome, as soon as practicable.
- Where practical, every effort will be made to resolve the complaint within 10 business days.

## 1.5 Urgent complaints

In the case of urgent complaints, priority assistance will be provided to facilitate timely resolution.

This may include such things as priority assistance for life threatening medical conditions or responding to customers on hardship programs.

## 1.6 Close out of complaints

All complaints and disputes will be formally closed out in writing. The closeout process will be consistently applied using the Objectivity principles outlined in Clause 1.7.

## 1.7 Objectivity

We will ensure that your complaint is addressed in a manner, which is:

- Fair and objective;
- impartial; and
- consistent with this policy, all applicable laws and other regulatory instruments, and our handling of any previous complaint of a similar nature.

## 1.8 Charges

We will not impose any charge or fee for lodging a complaint or requesting information in relation to complaints or a copy of this policy.



Where relevant, credit management will be suspended where a complaint relates to an invoice or an amount in dispute.

## 1.9 Confidentiality

We will comply at all times with the Privacy Act 1988 (Cth) (Privacy Act), other privacy laws and our Privacy and Credit Reporting Policy when collecting, using, storing or disclosing your personal information or sensitive information (these types of information are defined in the Privacy Act). We will only request your personal information or sensitive information when we require it in order to provide our services, or in relation to a complaint in relation to us or our services.

Where we provide products or services to you on credit, we are a credit provider for the purposes of the Privacy Act. As such, we will comply with rules in the Privacy Act in relation to the handling of information relating to credit reporting including those relating to your rights to access and correct that information and to raise related complaints. A full copy of our Privacy and Credit Reporting Policy is available for download on our website: [www.Circularenergy.com.au](http://www.Circularenergy.com.au).

You can contact us using the information given below if you would like to request a free copy of that policy.

## 1.10 Investigation of complaints

We will use all reasonable efforts to investigate all relevant circumstances and other information in relation to your complaint.

## 1.11 Customer-focused approach

We aim to distinguish ourselves by our high level of customer service. We will at all times adopt a customer-focused approach, both in handling your complaint and in all other dealings with you, by:

- ensuring you are able to lodge your complaint easily and effectively in accordance with this policy;
- complying at all times with this policy and all applicable laws and other regulatory instruments in relation to the handling and resolution of your complaint;
- keeping you updated as to our progress in resolving your complaint; and
- always treating you in a courteous and respectful manner.

## 1.12 Accountability

We will ensure we are fully accountable for your complaint, by:

- giving you an opportunity to provide comments or ask questions;
- giving you the contact details for the appropriate Energy Ombudsman and advising of your right to refer the complaint to the Energy Ombudsman if our proposed resolution is not satisfactory;
- providing complaints resolution procedures in accordance with this policy; and
- recording the details of your complaint in our customer management system and using this information to measure customer satisfaction with our services and help us improve our services.

## 1.13 Continuous Improvement



We will seek to continuously improve our customer service and our complaints and dispute resolution policy and procedures, by:

- reviewing and updating this policy on a regular basis, as discussed below; and
- recording complaints in our client management system and using this to measure customer satisfaction with our services and help us improve our services.

## **1.14 What is a complaint?**

A complaint is an expression of dissatisfaction made to Circular Energy where a response or resolution is expected. It may be related to our products, services, policies, procedures or the complaints-handling process itself. A complaint also includes a request by a customer to review their electricity invoice.

## **1.15 What happens when a complaint is received?**

When a complaint is received, we will:

- listen to or consider your complaint, provide relevant information to you and take all responsible steps to resolve the complaint;
- accurately record the details of the complaint, give it fair and genuine consideration and seek to achieve a fair outcome;
- investigate and enquire into the complaint and consult with the relevant staff as necessary within a reasonable timeframe, having regard to the nature and complexity of the complaint;
- keep you informed of any progress and seek to resolve the complaint quickly and directly in a way that is fair and reasonable;
- treat the complaint with respect and handle personal information in accordance with our Privacy and Credit Reporting Policy;
- if appropriate, recommend changes or actions to remedy the situation to prevent the situation recurring;
- promptly inform you of the outcome of the complaint and the reasons for the outcome;

If you are dissatisfied with a decision or outcome, we will inform you that you can request to have the outcome or decision reviewed internally (see section 1.14 below). We will also inform you of your right to refer the complaint or dispute to the appropriate Energy Ombudsman and provide you with the contact details of that Energy Ombudsman.

If the complaint is associated with any sales activity, we reserve the right to request a copy of the EIC or full voice recorded conversation to assist with the investigation.

If your distributor contacts us with the details of a customer complaint, we will deal with that complaint expeditiously and in accordance with this policy.

If you make an enquiry or complaint to us about an issue relating to a distribution system or customer connection services (other than a fault, an emergency, a planned interruption or an unplanned interruption), we will, in the case of a telephone enquiry or complaint, refer you to the distributor's enquiry telephone number or, in any other case, provide the relevant distributor with the details of the enquiry or the complaint as soon as practicable, but no later than the next business day.



If we become a failed retailer, we will maintain our procedures and communication channels with our former customers to raise and resolve complaints or disputes.

## 1.16 How to raise a complaint

### Step 1: Get in Contact with us

Please contact us if you are unhappy with anything in relation to us or our services and give our customer service representative the opportunity to resolve your complaint. You can get in touch with us using the contact details set out below:

- Telephone: 1300 20 44 62
- Email: [support@circularenergy.net.au](mailto:support@circularenergy.net.au)
- Address: 32 Unley Road, Unley SA 5061
- Website: [www.circularenergy.net.au](http://www.circularenergy.net.au)

### Step 2: If necessary, escalate your complaint

If our customer service representative is not able to provide you with a satisfactory resolution, you can immediately escalate your complaint to the customer service manager. The customer service manager will take ownership of your complaint and work with you to fix the problem.

### Step 3: If necessary, register an official complaint

If you are still not satisfied with our attempts to resolve your complaint, you can register an official complaint. In registering your official complaint and to help us resolve it as quickly as possible, we will ask you to give us as much information as you can in relation to the complaint, its cause and other relevant circumstances. We will record the details of the complaint in our customer management system and track its progress against the complaint resolution requirements set out in this policy. We will notify you of our proposed resolution as soon as practicable.

### Step 4: If necessary, escalate your complaint or dispute

If you are not satisfied with our proposed resolution to your complaint, or otherwise wish to make comments or ask questions about it, you can contact our customer service manager using the contact details set out above. If a satisfactory resolution still cannot be achieved, the customer service manager will refer your complaint to Circular Energy's Retail Manager.

### Step 5: Refer the complaint to the relevant Energy Ombudsman

If, after our best efforts, we fail to provide you with a satisfactory resolution to your complaint, you can refer the complaint to the Energy Ombudsman of the State where your premises are located, using the following contact details:

#### Energy and Water Ombudsman SA

Telephone: Website: Address: Submit a complaint:  
1800 665 565 [www.ewosa.com.au](http://www.ewosa.com.au) GPO Box 2947, ADELAIDE, SA 5001  
<http://www.ewosa.com.au/index.php/about/submit-a-complaint/>

#### New South Wales: Energy & Water Ombudsman NSW



Telephone: Website: Email: Address:  
1800 246 545 [www.ewon.com.au](http://www.ewon.com.au) [complaints@ewon.com.au](mailto:complaints@ewon.com.au)  
Reply Paid 86550, Sydney South NSW 1234

**Energy and Water Ombudsman Queensland**

Telephone: Website: Address: Submit a complaint:  
1800 662 837 [www.ewoq.com.au](http://www.ewoq.com.au) Level 16/53 Albert Street, Brisbane City QLD 4000, Australia  
<http://www.ewoq.com.au/submit-a-complaint/>

Our standard retail contracts and market retail contracts also recognise your right to refer complaints to the Energy Ombudsman and set out the Ombudsman contact details.

In addition, other external dispute resolution bodies include the

**Australian Competition and Consumer Commission (ACCC)**

[www.accc.gov.au](http://www.accc.gov.au)

**Australian Information Commissioner (OAIC)**

[www.oaic.gov.au](http://www.oaic.gov.au)

**1.17 Review**

This policy will be regularly reviewed to assess its performance and updated to ensure it complies with the relevant laws and statutes. A copy of this policy is available for download on our website ([www.circularenergy.net.au](http://www.circularenergy.net.au)).