

Complaints handling policy # BRP-POL-2017-001001



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Introduction

BRP seeks to maintain and enhance our reputation of providing our customers with high quality services. However, sometimes we may not be able to help our customers in the way they would like.

Our customer complaints process gives our customers a voice to provide feedback on our services. Comments and complaints are important to us, they help us understand what works well and give us an opportunity to improve.

BRP views complaints as an opportunity to learn and improve services and customer services for the future, as well as a chance to put things right for the person or organization that has made the complaint. BRP is committed to being responsive to the needs and concerns of our customers or potential customers and resolving theirs complaints as quickly as possible.

This policy has been designed to provide guidance to both our customers and staff on the manner in which BRP receives and manages your complaint. We are committed to being consistent, fair and impartial when handling your complaint.

The objectives of this policy are:

- To provide a fair complaints procedure which is clear and easy to use for anyone wishing to make a complaint
- To publicize the existence of our complaints procedure so that people know how to contact us to make a complaint
- To make sure everyone at BRP knows what to do if a complaint is received
- To make sure all complaints are investigated fairly and in a timely way
- To make sure that complaints are, wherever possible, resolved and that relationships are repaired
- To gather information which helps us to improve what we do
- To ensure a complaint is considered on its merits taking into account individual circumstances and needs

This complaints policy supports our core values of:

- **Clients** we are committed to excellence on meeting the interests and satisfaction of our customers
- **Compliance** we are committed to follow and comply with the laws and regulations of the places where business are conducted.
- **Ethics** BRP business conduct is based on integrity, honesty and seriousness. Ethics is the base of our reputation.
- **Team** Our professionals, knowledge and reputation are our most valuable assets.
- **Culture** Foster an open environment, with creative freedom and beliefs, encouraging the exchange of experiences as a listening and learning organization.

This complaints policy applies to all staff members, agency workers, contractors, associates and anyone else engaged to work with BRP, whether by direct contract with the organization or otherwise.



A complaint is any expression of dissatisfaction, whether justified or not, about the services of BRP where a response or resolution is explicitly or implicitly expected.

Where complaints come from

Complaints may come from clients and can be made verbally (by phone) or in writing (by email, BRP website or letter) and there is no difference between a 'formal' and an 'informal' complaint. Complainants do not need to explicitly state that they are making a complaint for it to be considered as such.

Unless otherwise stated, all references to a complaint in this document refer to customer complaints.

Our complaints handling principles

We have developed the following principles using lessons learned from our own experience and good practice from other organizations that are recognized for their complaint handling.

The principles are consistent with ISO 10002 standards; internationally recognized guidelines for an effective and efficient complaints handling process.

Visibility

Our Complaints Handling Policy is available on the BRP Website and also internally. Our staff are informed about the complaints process and able to advise our customers on how to make a complaint. As an organization, we are committed to excellent service and we try to make sure that our complaints process is open and transparent.

Accessibility

Our Complaints Handling Policy is readily accessible to all partners, employees and clients. The Policy is easy to understand and includes details on making and resolving complaints.

Ways of making a complaint

We are flexible and want to make sure that everyone has access to our complaints process. Options for contacting us are outlined on the "Handling a complaint" section of this policy.

Responsiveness

Receipt of each complaint is acknowledged to the complainant, wherever possible within five working days.

Complaints will be handled in an efficient and effective manner. Complainants will be treated courteously and kept informed of the progress of their complaint throughout the complaint handling process.



Complainants will be informed of any likely delays as soon as we become aware of them. For example, if in the course of reviewing a complaint it becomes clear that it is more complex and requires a longer time to consider.

Where a complaint raises a serious risk or relates to a time-sensitive issue, we will try to prioritize it.

Objectivity

We treat every complaint on its merits, regardless of who has made the complaint. We act honestly and treat all complainants fairly and with respect.

Charges

There will be no charge to the complainant for making a complaint.

Confidentiality

All complaint information will be handled sensitively and used appropriately, telling only those who need to know and following any relevant data protection requirements.

Customer-focused approach

BRP is committed to efficient and fair resolution of complaints and acknowledge a client's right to complain.

Accountability

All partners and employees accept responsibility for effective complaints handling.

The members of the Board will ensure that, where appropriate, issues raised in the complaints handling process may reflect in partners and employee performance evaluation.

Continual Improvement

Our complaints handling process will be reviewed periodically, and updated as required, in order to enhance its efficient delivery of effective outcomes.

Responsibility

Overall responsibility for this policy and its implementation lies with the members of the Board.

Adopted on:..... January 05th, 2017

Last reviewed:..... January 04th, 2017



a. How to submit a complaint?

Complaints may be sent to BRP by the ways described below.

By e-mail: contato@brpbrasil.com

By BRP website: <u>http://www.brpbrasil.com/en/contact.php</u>

By phone: +55 21 2430-9903

By letter:

Av. José Silva de Azevedo Neto, 200 Bloco 04 - Sala 104 - Edifício Evolution V - O2 Corporate & Offices 22775-056 - Barra da Tijuca - Rio de Janeiro - RJ - Brasil

b. What information is required when making a complaint?

When making a complaint, please provide the following information:

- Your name, position and contact details
- Your relationship with BRP (i.e. the nature of your engagement with BRP, if you are a client)
- Your contact person within BRP
- The nature of the complaint (including when the conduct giving rise to the complaint occurred)
- Details of the BRP partner or employee involved (if applicable)
- Copies of any documentation supporting the complaint.

Receiving Complaints

The person who receives a phone or in person complaint should:

- Write down the facts of the complaint
- Take the complainant's name, address and telephone number
- Note down the relationship of the complainant to BRP (for example: client, member)
- Tell the complainant that we have a complaints procedure
- Tell the complainant what will happen next and how long it will take
- Where appropriate, ask the complainant to send a written account by post or by email so that the complaint is recorded in the complainant's own words.

For further guidelines about handling verbal complaints, see Appendix 1



Stage One

Complaints should be acknowledged by the person handling the complaint within five working days. The acknowledgement should say who is dealing with the complaint and when the complainant can expect a reply. A copy of this complaints procedure must be sent to the complainant.

Whether the complaint is justified or not, the reply to the complainant should describe the action taken to investigate the complaint, the conclusions from the investigation, and any action taken as a result of the complaint.

In many cases, a complaint is best resolved by the person responsible for the issue being complained about. If the complaint has been received by that person, they may be able to resolve it swiftly and should do so if possible and appropriate.

Whether or not the complaint has been resolved, the complaint information should be passed to the board within one week.

Stage Two

If the complainant feels that the problem has not been satisfactorily resolved at Stage One, they can request that the complaint is reviewed at Board level. At this stage, the complaint will be passed to a member of the Board.

The request for Board level review should be acknowledged within a week of receiving it. The acknowledgement should say who will deal with the case and when the complainant can expect a reply.

The Board may investigate the facts of the case themselves or delegate a suitably senior person to do so. This may involve reviewing the paperwork of the case and speaking with the person who dealt with the complaint at Stage One.

If the complaint relates to a specific person, they should be informed and given a further opportunity to respond.

The person who dealt with the original complaint at Stage One should be kept informed of what is happening.

Whether the complaint is upheld or not, the reply to the complainant should describe the action taken to investigate the complaint, the conclusions from the investigation, and any action taken as a result of the complaint.

The decision taken at this stage is final, unless the Board decides it is appropriate to seek external assistance with resolution.

d. Variation of the Complaints Procedure

The Board may vary the procedure for good reason. This may be necessary to avoid a conflict of interest, for example, a complaint about one member of the Board should not lead a Stage Two review.



Appendix 1 - Practical Guidance for Handling Verbal Complaints

- Remain calm and respectful throughout the conversation
- Listen allow the person to talk about the complaint in their own words. Sometimes a person just wants to "let off steam"
- Don't debate the facts in the first instance, especially if the person is angry
- Show an interest in what is being said
- Obtain details about the complaint before any personal details
- Ask for clarification wherever necessary
- Show that you have understood the complaint by reflecting back what you have noted down
- Acknowledge the person's feelings (even if you feel that they are being unreasonable) you can do this without making a comment on the complaint itself or making any admission of fault on behalf of the organization e.g "I understand that this situation is frustrating for you"
- If you feel that an apology is deserved for something that was the responsibility of your organization, then apologize
- Ask the person what they would like to be done to resolve the issue
- Be clear about what you can do, how long it will take and what it will involve.
- Don't promise things you can't deliver
- Give clear and valid reasons why requests cannot be met
- Make sure that the person understands what they have been told
- Wherever appropriate, inform the person about the available avenues of review or appeal