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## Complaints Handling Policy Summary

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### GENERAL

AMBA places a high priority on the resolution of complaints.

All our clients, their customers and debtors whose accounts we manage have the right to complain if they are unhappy or dissatisfied with any aspect of our business and we welcome and encourage customer/debtor feedback.

Each staff member is expected to treat complaints seriously and to act swiftly to resolve them to the customer's or debtor's satisfaction, where possible.

### RESOLUTION PRINCIPLES

The basic principles underpinning AMBA's approach to dispute resolution are:

- Easy, free access by all clients, creditor customers, debtors and their representatives;
- Fair and reasonable responses;
- Resolution at the first point of contact, wherever possible, or within defined time frames where not;
- Open and accurate communication between all involved; and
- Simplicity of approach.

To assist AMBA' clients, their creditor customers and debtors voice their concerns, AMBA will:

- Accept complaints by phone, email, letter or in person; and
- Provide a 1300 contact number currently 1300 857 663.

### COMPLAINT TYPES

There are four main categories of complaint, covering a range of matters. The type of complaint will usually indicate who has responsibility for handling it. The main complaint types and some examples of the matters covered are:

#### Conduct

Some complaints will be concerned with the conduct of our own staff or other parties who provide information or services to us. The issues involved may include:

- Customer service
- Collections activity
- Enforcement activity

#### Debtor Liability

Complaints may be received about the debtor's liability. These complaints may concern issues such as:

- Joint & several liability
- Account balances

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- Disputed liability

#### **Account Management**

Clients and their creditor customers and debtors may have concerns about a range of account management issues such as:

- Fees & charges
- Direct debits
- Hardship variations
- Credit Bureaux listings

#### **Privacy**

Clients and their creditor customers and debtors may also have concerns about how information has been managed, including issues such as the following:

- Unauthorised disclosures
- Use of personal information
- Access to personal information

Complaints about conduct and unauthorised privacy disclosures must be referred to the Complaints Resolution Manager.

#### **COMPLAINT SOURCES**

AMBA may receive complaints from a range of people and organisations other than the debtor. How they are handled will depend on both who is making the complaint and the type of complaint.

All third parties acting on the debtor's behalf must provide a written authorisation from the debtor before we can discuss the problem with them or provide them with any written documentation. The debtor's identification details on the authorisation must be verified before dealing with the third party.

#### **RESPONSE TIME FRAMES**

While we endeavour to resolve complaints immediately, all complaints that cannot be resolved within two business days to the client or debtor's satisfaction are to be referred to the Complaints Resolution Manager.

Matters that should be referred directly to the Complaints Resolution Manager include:

- Contract terms/condition disputes
- Liability disputes, i.e. co-borrower or guarantor status
- Service provider conduct i.e. legal service providers staff
- Privacy breaches

In these instances, the complainant must be informed their complaint has been referred to the Complaints Resolution Manager and they can expect contact from that person within two business days.

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Complex matters must be resolved as soon as practicable, with resolution to be obtained within a maximum of 30 days.

### **Third Parties**

Third parties include any professional person who acts on behalf of a debtor regardless of whether that debtor is a consumer, sole trader, partnership or corporation. It can include financial counsellors, solicitors, accountants or Legal Aid.

Before dealing with a person acting on behalf of a debtor, AMBA must receive a written consent from the debtor authorising the third party to act on his/her behalf. This is a Privacy Act obligation.

### **Regulators**

There is a range of regulatory bodies that may investigate a debtor's complaint. These bodies include the Australian Securities & Investment Commission (ASIC), the Australian Competition and Consumer Commission (ACCC), Police and any of the Fair Trading/Consumer Affairs departments or offices in the various States or Territories.

An enquiry from any of these bodies may indicate an alleged breach of consumer protection legislation.

**NB:** The Complaints Resolution Manager must be made aware of these matters immediately. The relevant client must also be informed immediately.

### **Media**

Any enquiry from the media must be referred to the General Manager and the Complaints Resolution Manager for immediate attention.

### **INFORMATION REQUIRED**

To enable the fast resolution of the complaint, we will need the following information:

- Complainant's Name
- Account or Reference Number
- Name(s) of any AMBA staff involved in the matter
- Relevant Facts
- Clear and concise details as to the nature of your complaint

### **FURTHER INFORMATION**

If you have any questions or if you wish to obtain a copy of the full policy document please contact The Compliance & Privacy manager:

Mail: The Compliance & Privacy manager  
AMBA Commercial Collections Pty Ltd  
Suite 164, Level 6, 10 Park Road  
Hurstville NSW 2220

Telephone: 02 9570 2955  
Facsimile: 02 9570 2944  
Email: [compliance@ambacc.com.au](mailto:compliance@ambacc.com.au)

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