

VISY GROUP COMPLAINTS HANDLING POLICY AND PROCEDURE

PURPOSE & SCOPE

This document sets out Visy's requirements in relation to Complaints Handling.

DOCUMENT OWNER

This document is owned by the Visy Legal Department and the Head of Risk Management. Any queries should be discussed with the Visy Legal Department and Head of Risk Management.

REVIEW DATE

This Policy will be reviewed and updated when required.

POLICY

1. POLICY

Visy is committed to handling complaints, originating both internally and externally, in a clearly defined, effective and expeditious manner.

Our values and way of working foster a culture that:

- treats customers, employees, suppliers and contractors with respect by acknowledging their right to complain and have a complaint handled professionally;
- actively solicits and acts on employee, customer, supplier and contractor feedback; and
- acknowledges that a complaint received gives Visy an opportunity to maintain confidence in our brand.

Any person or organisation who has any concerns about inappropriate or improper conduct¹ or non-compliance with Visy's policies, procedures or applicable laws is invited to lodge a complaint which shall be dealt with in accordance with this Complaints Handling Policy and Procedure.

Visy's Complaints Officer is responsible for managing the handling and registration of complaints. Visy is committed to the principles embodied in the Australian Standard for complaints handling.²

Remember – handling complaints is everyone's job. Everyone working within Visy must understand this Complaints Handling Policy and Procedure. If you do not, or if you have any questions, contact the Complaints Officer.

¹ Improper conduct may include fraudulent; corrupt; dishonest; illegal, unethical; or engagement in outside interests, activities or investments which could interfere with the performance of duties or constitute a conflict of interest. Improper conduct also includes conduct which involves substantial risk to public health and safety or the health and safety of Visy employees; substantial risk to the environment; or substantial mismanagement of Visy resources.

² The current Australian Standard is AS/ISO 10002-2006 – Customer Satisfaction – Guidelines for complaints handling in organisations.

NOTE: Where the complaint alleges improper conduct or anticompetitive conduct – for example, complaints relating to:

- fraud;
- corruption;
- unlawful activity;
- discrimination, harassment, bullying, occupational violence, vilification or victimisation ;
- an unresolved customer/supplier/staff complaint under the Complaints Handling Policy and Procedure; or
- anticompetitive conduct:
 - Visy communications with competitors regarding:
 - prices charged to customers or resellers or for the collection of waste from customers;
 - pricing or other terms of tenders;
 - the supply of goods or services to particular areas or regions;
 - winning or losing customers
 - restrictions being imposed on suppliers or customers; or
- conduct that is otherwise a breach of the Visy Code of Conduct;

notify the Complaints Officer immediately, as the complaint must be dealt with in accordance with the Whistleblower and Improper Conduct Policy and Procedure.

Alternatively, you may contact the independent external service provider engaged by Visy to take complaints alleging such conduct, STOPline, on:

- 1300-304-550 (in Australia)
- + 61-3-98113275 (other countries). Note reverse charges accepted by STOPline
- Email STOPline through 'visy@stoline.com.au'
- Or as set out in the Whistleblower and Improper Conduct Policy and Procedure.

2. COMPLAINTS HANDLING PROCESS

A complaint other than an allegation of improper conduct or anticompetitive conduct can be made via a number of channels including:

- by phone on 1300 855 448 (internal number)
- via the website: www.visy.com.au , and in particular the enquiry form under the tab, 'Contact Us'
- in writing to the:
Complaints Officer, Visy
Level 11/2 Southbank
Boulevard Southbank,
Melbourne Victoria 3006
- a Visy line Manager.

In each case, the complaints resolution process outlined below should be followed.

The person who first receives the complaint will:

- Immediately acknowledge your complaint (either during the phone call from the complainant or by way of an email);
- Record the complaint in a Complaints Register giving the complaint a unique identification number;

- If necessary, retain a file on the complaint;
- Gather sufficient detail about the complaint in order to properly investigate and respond (eg. information about an incident or product, timing, persons or companies involved). This information must be recorded in the Complaints Register.
- If he/she is able to resolve the issue on the spot, do so and record how the matter was resolved and change the status of the matter in the Complaints Register to 'closed'. If the person who first receives the complaint is not able to resolve the complaint within 10 days, he/she must escalate the complaint to his/her manager or to the relevant business division.
- Where the matter relates to a product or service or technical issue that he/she cannot resolve, transfer the complainant to the relevant business division and note this step in the Complaints Register. The representative at the relevant business division must take steps to resolve the complaint. If the complaint cannot be resolved by that representative within 10 days, the complaint must be escalated to a Manager within the relevant Division.

A complaint escalated to a Manager must be resolved within a further 5 days or a longer period agreed with the complainant. If the Manager cannot resolve the complaint within the further 5 days or period agreed with the complainant, the complaint must be escalated to the Divisional Director or Executive General Manager. At this time the Visy Legal Department and the Group Complaints Manager must be notified.

If the Divisional Director or Executive General Manager cannot resolve the complaint within a further 3 days or a longer period agreed with the complainant, the complaint must be escalated to the Chief Operating Officer.

NOTE: Each escalation step must be recorded in the Complaints Register.

- If, at any point, a complainant threatens legal proceedings, a regulator is involved or is likely to become involved, you must consult with the Visy Legal Department.
- The Complaints Officer will regularly check the Complaints Register to ensure matters are promptly escalated when they cannot be resolved and involve the Visy Legal Department where the Complaints Officer considers it appropriate to do so.

3. SOLUTIONS AND REMEDIES

A number of remedies are available to address customer complaints which reflect good industry practice; are fair and reasonable in the particular circumstances; and meet Visy's legal obligations.

Options include:

- Refund or replacement product/services
- Information, explanation or technical assistance
- An apology
- Compensation

The appropriate options must be discussed with the Complaints Officer and/or the Visy Legal Department.

What if Visy is not at fault?

If, after a careful investigation, it is determined that Visy is not at fault or liable, a carefully worded letter should be sent to the customer, supplier or employee explaining our position. This must be approved by the Complaints Officer or the Visy Legal Department.

What if the complaint is not resolved to the complainant's satisfaction?

If the complainant rejects Visy's proposed decision/action, the complaint should remain open in the Complaints Register. This should be recorded and the complainant should be informed of alternate forms of external recourse available. Again, the person who receives the complaint or the Visy representative dealing with the complaint at the time must speak with the Complaints Officer prior to taking this step.

4. COMMUNICATING AND RECORDING

All complaints must be recorded in the Complaints Register by the person who receives the complaint. If a matter is escalated, the person to whom the matter is escalated must ensure that the Register is maintained and updated.

5. COMPLAINTS HANDLING PRINCIPLES

Visy will handle complaints in accordance with the following principles:

Commitment	Visy is committed to efficient and fair resolution of complaints.
Confidentiality	The identity of a complainant may be recorded in the complaints handling system for the purpose of dealing with the complaint, but is not otherwise disclosed without consent or where it is necessary to do so in order to investigate the complaint.
Fairness	<p>Visy recognises the need to be fair to the complainant and to deal with all complaints in an impartial manner.</p> <p>No decision and subsequent action will be taken until the complaint has been appropriately investigated.</p> <p>Following submission of a complaint, respondents have a right to know all the allegations made against them, as well as being given the opportunity to fully respond.</p> <p>It may be inappropriate for a particular person to deal with a particular complaint. This person may be a friend or have a close working relationship with the complainant. In such cases, the matter will be referred to another appropriate manager.</p> <p>Visy will ensure that a person making a complaint or any related party or witness is not victimised in any way.</p> <p>All Visy personnel are entitled to make a genuine complaint knowing that such action will not, in any way, affect their current employment status, future career prospects or general standing in the workplace. (For further information see Visy's Improper Conduct and Whistleblower Policy and Procedure.)</p>
Responsiveness	All complaints will be dealt with in a timely and courteous manner.
Resources	Visy will allocate sufficient resources for complaints handling and resolution.
Visibility & Access	This Policy will be distributed to all employees and is available on its internal site and on its website www.visy.com.au . This Policy will be distributed to all new employees and contractors as part of the induction process and will be referred to during relevant ongoing compliance training.
Assistance	Visy's Complaints Officer can assist with the formulation and lodgement of complaints if required.
Remedies	Appropriate remedies for complaints will be determined and implemented in accordance with this Policy. If the informant believes that this Policy has not been followed properly, or the outcome is unacceptable, the complainant may contact the Chief Executive Officer or General Counsel for a review.
Data Collection	All complaints and records of outcomes will be recorded in the Complaints Register.

Review and audit	Visy analyses its Complaints Register with a view to identifying and rectifying systemic and recurring problems (caused by failures in the product or service design, delivery system or organisational policy or procedures).
Accountability	Visy's Complaints Officer will report on the operation of this Policy to the Governance Board at least every 6 months