

Business Procedure

Complaint handling Document Number – STM-PROC-16

This document applies to the following sites:

All Sites <input checked="" type="checkbox"/>	
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1.0 Purpose

The purpose of this procedure is to define the process for receiving, investigating and responding to complaints.

2.0 Scope

This procedure applies to all complaints received by Stanwell. This procedure does not apply to:

- media enquiries
- Environmental complaints and Environmental events (all sites)
- Marketing and Trading related enquiries including agreed contracts
- Enterprise Bargaining Agreement related grievances or disputes
- reportable conduct.

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3.0 Definitions

Complaint:	An expression of dissatisfaction about one or more of Stanwell's actions and/or performance from a person (anonymous or otherwise) or organisation external to Stanwell requesting or requiring a response.
Reportable conduct	Reportable conduct includes conduct by Stanwell people, which, in the view of the individual or organisation making the disclosure, is: <ul style="list-style-type: none"> • dishonest • fraudulent • corrupt • unethical • an illegal act, including theft, drug sale or use, violence or threatened violence or criminal damage against property • a repeated breach of Stanwell policy or administrative processes • a breach of Commonwealth or State legislation or local authority by-laws • an unsafe work practice which involves substantial risk to the health and safety of our people or the public • any other conduct which may cause financial or non-financial loss to Stanwell or be otherwise detrimental to the interests of Stanwell • any deliberate concealment relating to any of the above.
Stanwell people	Stanwell Directors, employees and all contractors working for or at a Stanwell site, in their capacity as a Director, employee or contractor of Stanwell.

4.0 Actions

4.1 Receiving complaints

The Stanwell officer who receives a complaint is responsible for noting the time and date of the complaint, the name and other details of the complainant; and the nature of the complaint. They must also ensure the complaint is referred promptly to an appropriate representative for action.

If a complaint is verbal and can immediately be responded to with factual information within the receiving officer's role scope, the exchange should simply be recorded in line with section 4.2.

Environmental complaints and events (all sites) are managed in accordance with the Event Management Strategy GOV-STR-02 and Procedure GOV-PROC-46 and referred immediately to the relevant site environmental representative. Community Relations supports the Environment Team, and, where applicable, the Meandu contract mine operator, where there is a requirement for contact with an external complainant and/or the complaint places Stanwell's reputation at risk.

General complaints from members of the public or external organisations should be referred to the Community Relations Manager as soon as possible, and within one working day of the complaint being received.

If a complaint or information is received about reportable conduct allegedly committed by a Stanwell person (or people) it should be immediately referred to the Company Secretary.

4.2 Recording complaints

The Community Relations Manager is responsible for ensuring appropriate details about the complaint are recorded in TRIM folder STK3966 as soon as practicable. The file name must be searchable by topic, stakeholder (if identifiable) and site/project and should include the EARS reference number (if applicable).

This includes recording the:

- response and investigation undertaken as a result of the complaint
- name of the person responsible for investigating the complaint
- actions taken as a result of the investigation.

Where appropriate, the matter should be escalated through appropriate channels to the Executive Leadership Team and/or Board.

4.3 Investigating complaints

The delegated representative, Community Relations Manager or the Company Secretary may manage the complaint directly, or they may assign the complaint to a more specialised officer.

The investigating officer should contact the complainant by phone (if details are available and the complainant would be open to such an approach), email or letter within three working days to acknowledge receipt of the complaint and commit to future contact within the next 10 working days. A communication template is attached as an appendix to this document.

The nature of the complaint will determine the length and complexity of the response; however, the following principles will apply in all cases:

- All valid complaints are to be investigated.
- Complainants are to have one primary contact at the level appropriate to the nature of the complaint.
- Complainants are to be contacted at appropriate intervals during the process.
- If particularly sensitive, or otherwise deemed necessary, the investigating specialist should be accompanied by an appropriate Stanwell representative for all face-to-face contact with a complainant.

4.4 Resolving complaints

When the investigating specialist is satisfied that they have sufficient information, they are to ensure appropriate internal approval of the proposed resolution of the complaint.

Approval may need to be from a combination of:

- investigating specialist's line manager
- Site Manager
- General Manager of the team responsible for the process complained about
- Community Relations Manager
- Legal Counsel.

The history between Stanwell and the complainant, the seriousness of the complaint and/or whether the complaint is public knowledge will all help to determine whether the outcome of the investigation is communicated to the complainant by phone, email, face-to-face meeting and/or formal written correspondence.

In all cases, the following principles apply:

- The complainant should be thanked for contacting Stanwell and extended due respect.
- The specialist should provide information that is factual and unbiased, and where appropriate and if possible, scientifically-based.
- The communication should convey that Stanwell acted upon the complaint and if possible/appropriate, the complaint has led to an improvement.
- If appropriate, the complainant should be offered a further course of action (i.e. meeting with more senior specialist, tour of facility, remedial work at Stanwell's expense).

5.0 Review and Consultation

This document is required to be reviewed, as a minimum, every two years in consultation with key internal stakeholders, including (but not limited to):

- Community Relations Manager
- Company Secretary.

6.0 Communication Plan

At a minimum, this procedure and any subsequent updates are communicated through My News. This procedure is available electronically on GenNet.

7.0 References

- Corporations Act 2001 part 9 4AAA
- Public Interest Disclosure Act 2010
- Public Interest Disclosure Standard
- Code of Conduct (GOV-POL-30) – Whistleblower Protection Policy (GOV-POL-29) and Protected Disclosure Procedure (GOV-PROC-36)

8.0 Revision History

Rev. No.	Rev. Date	Revision Description	Author	Endorsed By	Approved. By
0	02.05.2012	First draft completed in consultation with Environment and Company Secretariat	Natalie Bain		Jenny Gregg
1	12.06.2012	Minor amendments made in relation to Meandu Mine	Natalie Bain		Jenny Gregg
2	03.08.2012	Minor amendments in relation to recording information	Natalie Bain		Jenny Gregg
3	14.07.2014	Minor amendments to reflect organisational structure	Stephanie McMahon		Jenny Gregg
-	21.05.2015	Document References updated to remove reference to HSE-PROC-11 as it has been archived and replaced by GOV-PROC-46. Inclusion of the reference to GOV-PROC-46 is to be done upon the instruction of the document owners to ensure alignment to any process changes. No Signatures required	D.Wilkie		
4	05.04.2016	Amendments to reflect implementation of GOV-PROC-46 for Environmental Events and Complaints to be managed in EARS	John Carey	Stephanie McMahon	Jenny Gregg

ACKNOWLEDGING COMPLAINT – Example

Note – adapt for letter/phone call as appropriate

Thank you for your letter of [date] addressed to [position and name]. Your letter was forwarded to me for action and I will be personally supervising an investigation into the matter you raised.

At Stanwell, we always welcome feedback on the way we conduct our operations. I can assure you that it is our intention to provide a response as soon as possible, and that I will contact you again within 10 working days to update you on the status of the investigation.

If you have any questions in the meantime, please do not hesitate to contact me on the details below.

Yours sincerely