



GL Attorneys

Est. 2003

Complaints/Query Management Policy and Procedure

VERSION 1

1. Purpose

This Policy sets out the process in which GL Attorneys receives and handles complaints made against the Company, its employees, stakeholders and/or clients and to be able to resolve complaints in an efficient, speedily, effective, and professional manner.

The procedure is applicable to all written and verbal complaints received from debtors, the National Credit Regulator, the Credit Ombudsman and/or the Legal Practice Council on debtor accounts which GL Attorneys is mandated to collect on in terms of Service Level Agreements with its respective clients.

All complaints, not only those related to a potential violation or infringement of the laws and regulations governing the legal collections industry and the attorney profession, will be considered, and thoroughly investigated and fairly addressed by the Company.

The necessary measures have been taken to inform all GL Attorneys employees of the Companies complaint handling procedure and regular training and calibrations sessions are held to ensure that all complaints are resolved amicably and timeously.

2. What is a complaint?

A complaint is any formal document that sets out the facts and reasons that the filing party or parties believes are sufficient to support a claim against the party or parties against whom the claim is brought that entitles the plaintiff to a remedy. This Policy sets out the process in which GL Attorneys receives and handles complaints made against the Company, its employees, stakeholders and/or clients and to be able to resolve complaints in an efficient, speedy, effective, and professional manner.

The procedure is applicable to all written and oral complaints received from debtors, the National Credit Regulator, the Credit Ombudsman and/or the Law Society of the Northern Provinces on debtor accounts which GL Attorneys is mandated to collect on in terms of Service Level Agreements with its respective clients.

The necessary measures have been taken to inform all GL Attorneys employees of the Company's complaint handling procedure.

3. Procedure for effective complaints handling

All employees of GL ATTORNEYS must apply the following guidelines for effective complaints handling:

- **Disclosure and Legislation:** The Complaints Handling Policy must be disclosed and made easily accessible to all directors, management, employees, and clients. Management and employees are provided with

the necessary tools to respond to a complaint in line with relevant Legislation applicable to the Legal collections industry.

- Turnaround times and feedback: Acknowledgement of receipt of the complaint must be sent to the complainant upon receipt. The process of providing feedback must be handled efficiently and professionally; complainants will be kept informed of the progress of their complaint through-out the complaint handling process, ensuring resolution within 24 hours.
- Confidentiality: Personally identifiable information related to the complainant is protected from disclosure unless the complainant expressly consents to the disclosure of information.
- Accountability: All managers and employees of GL ATTORNEYS accept responsibility for an effective and professional complaints handling policy. The Quality Manager/Complaint's officer will ensure to when appropriate and/or when the complaint is of such nature wherein conduct of a GL ATTORNEYS employee reflects negatively, refer the matter to the HR Director for review and for possible institution of disciplinary action. All employees are measured in terms of a performance evaluation process. Factors raised, whether negative/positive in the complaints handling process, are included in the employee performance evaluation.

4. How to Log a Complaint

Complaints received in writing as well as complaints received telephonically must be reduced to writing (clear and concise details of the complaint should be provided) by the person receiving the call/email and forwarded to complaints@gla.co.za for audit purposes.

5. Information Required

The following information is required in order to attend to the complaint effectively;

- Reference number as reflected on Swordfish Debt Collection Software.
- Name, Surname, identity number, contact details and email/telephone number of the complainant.
- Nature of the complaint (including when the conduct giving rise to the complaint occurred).
- Details of the employee / manager at GL ATTORNEYS involved (if applicable).
- Supporting documentation if any, substantiating the claim.

6. Risk Management

The Directors, Management and Employees strive to ensure effective complaints handling. This is done through the comprehension of the negative impact that a complaint can have – as well the risk involved in the absence of an aligned procedure when dealing with complaints – against a business as well as its clients. All employees against whom a complaint/query has been lodged, must accordingly escalate the matter to the QA department on date of receipt of the complaint.

The following steps are taken by GL ATTORNEYS in ensuring that risk is managed and/or limited in the complaints handling procedure:

- 1-2-1 sessions are given to all employees dealing with the debtors' accounts by the QA Department. Team Leaders are made accountable for ensuring that the QA process is adhered to. All coaching sessions are documented for reference.
- Quarterly team calibration sessions are held where call centre agents are given the opportunity to listen to their own selected calls and rate themselves based on business processes to be adhered to.
- A monthly report is provided to the Directors by the QA Manager, which is pulled from our QA monitoring software, Goldfish which highlights the following:
- Trends on the nature of the complaints being received.

- Employee performance – positive or negative feedback;
- Number of complaints received and success rate on resolution.
- Notes of the feedback are captured and recorded on the Employees file on Filefish - HR Management Software.
- HR is involved in ensuring that staff with transgressions against whom a complaint have been lodged is addressed in terms of the Company's Disciplinary Code of Conduct.
- Positive feedback from debtors, third parties and clients are at all times praised by Management sending a commending email to the Employee receiving the feedback as well as to all staff.

7. Record of Complaints

The QA department will be responsible for creating a complaints log of all complaints received together with responses linked to the complaint, to keep an audit trail for reporting purposes as well as to keep track of the status of the complaint, the nature of complaints being received and the volume of complaints.

This will allow proper feedback to the Directors and clients when required and to ensure that the complaints handling procedure is always being adhered to.

The following process will be applied when documenting a complaint:

- All complaints will be recorded on Goldfish
- Type of complaint and reference.
- Date and time of all contact and correspondence with the debtor will be uploaded onto Swordfish Software.
- Whether the issue was resolved or not.
- Whether the complaints were received from and/or escalated to the Law Society of the Northern Provinces, the National Credit Regulator, the Credit Ombudsman, published on public domains such Hello Peter and/or other published media.
- Whether the complaint resulted in a civil action being brought to court.
- Details of any internal processes followed where the complaint involved the conduct of an employee of GL ATTORNEYS.