COMPLAINTS POLICY OF BENTLEY TELECOM LIMITED

1. **Definitions**

1.1 In this Complaints Policy the following expressions have the following meanings:

"Appeal"	means your request to escalate a Complaint from Level One to Level Two if you are not satisfied with the outcome at Level One;
"Appeal Handler"	means an employee of the Company who will handle Level Two Complaints;
"Business Day"	means, any day (other than Saturday or Sunday) on which ordinary banks are open for their full range of normal business in London;
"Company"	Bentley Telecom Limited, a private company incorporated and registered in England and Wales with company number 00403127;
"Complaint"	means a complaint about Goods or Services sold by the Company, about our customer service, or about our employees;
"Complaint Handler"	means an employee of the Company who will handle Level One Complaints;
"Complaints Policy"	means this document;
"Complaint Reference"	means a unique code assigned to your Complaint that will be used to track your Complaint;
"External Resolution"	means the referral of your Complaint to an external body or organisation for resolution if the customer is not satisfied with the outcome at Level Two;
"Goods"	the goods (or any part of them) set out in the customer's order for the supply of goods;
"Level One"	means the first stage in our complaints handling procedure under which your Complaint will be handled by a Complaint Handler;
"Level Two"	means the second stage in our complaints handling procedure under which you may appeal the outcome of a Level One Complaint. Your Complaint will be handled by an Appeal Handler; and
"Services"	the services (or any part of them) set out in the customer's order for the supply of services.

2. **Purpose of this Complaints Policy**

2.1 The Company welcomes and encourages feedback of all kinds from our customers. If you have a Complaint about our Goods or Services, our customer service, or about our employees, not only do we want to resolve it to your satisfaction but we also want to learn from it in order to improve our business and customer experience in the future.

2.2 It is our policy to resolve Complaints quickly and fairly, where possible without recourse to formal investigations or external bodies. In particular, the aims of this Complaints Policy are:

2.2.1 to provide a clear and fair procedure for any customers who wish to make a Complaint about the Company, our Goods or Services**,** our customer service, or about our employees;

2.2.2 to ensure that everyone working for or with the Company knows how to handle Complaints made by our customers;

2.2.3 to ensure that all Complaints are handled equally and in a fair and timely fashion; and

2.2.4 to ensure that important information is gathered from Complaints and used in the future to avoid such a situation arising again.

3. **What this Complaints Policy Covers**

3.1 This Complaints Policy applies to the sale of Goods or the provision of Services by the Company, to our customers.

3.2 For the purposes of this Complaints Policy, any reference to the Company also includes our employees.

3.3 Complaints may relate to any of our activities and may include (but not be limited to):

3.3.1 the quality of customer service you have received from the Company;

3.3.2 the behaviour and/or professional competence of our employees;

3.3.3 delays, defects or other problems associated with the sale of Goods by the Company; or

3.3.4 delays, defects, poor workmanship or other problems associated with the provision of Services by the Company.

3.4 The following are not considered to be Complaints and should therefore be directed to your usual contact or department:

3.4.1 general questions about our Goods or services;

3.4.2 returns of damaged, faulty, incorrect or unwanted Goods for exchange or refund in accordance with our Terms and Conditions where there is no further complaint;

3.4.3 matters concerning contractual or other legal disputes; and

3.4.4 formal requests for the disclosure of information, for example, under the Data Protection Act.

4. **Making a Complaint**

4.1 All Complaints, whether they concern our Goods or Services, our customer service, or our employees should be made via accessing a complaints form. Details of the complaints form can be found below at 8.1.

4.2 When making a Complaint, you will be required to provide the following information in as much detail as is reasonably possible:

4.2.1 Your name, address, telephone number and email address (We will contact you using your preferred contact method as your Complaint is handled);

4.2.2 If you are making a Complaint on behalf of someone else, that person's name and contact details as well as your own;

4.2.3 If you are making a Complaint about a particular transaction, the order number;

4.2.4 If you are making a Complaint about a particular employee of ours, the name and, where appropriate, position of that employee;

4.2.5 Further details of your Complaint including, as appropriate, all times, dates, events, and people involved;

4.2.6 Details of any documents or other evidence you wish to rely on in support of your Complaint; and

4.2.7 Details of what you would like the Company to do to resolve your Complaint and to put things right. (Please note that whilst we will make every reasonable effort to accommodate such requests, we are not bound to take any action beyond that which we may be contractually or otherwise legally obliged to take.)

5. **How We Handle Your Complaint**

5.1 The Company operates a two-stage complaints handling procedure. Our aim is to always resolve Complaints to your satisfaction at Level One without further recourse to Level Two. If you are not satisfied at the end of Level One, you may escalate your Complaint to Level Two. If you are still not satisfied at the end of Level Two, Complaints may progress to External Resolution as detailed below.

5.2 Level One:

5.2.1 Upon receipt of your Complaint, the Complaint Handler will log the Complaint in our complaints log and will acknowledge receipt of it in writing within 4 (four) Business Days, giving you a Complaint Reference.

5.2.2 When we acknowledge receipt of your Complaint we will also provide details of your Complaint Handler.

5.2.3 If your Complaint relates to a specific employee, that person will be informed of your Complaint and given a fair and reasonable opportunity to respond. Any communication between you and the employee in question should take place only via the Complaint Handler and we respectfully ask that you do not contact the employee in question directly concerning the Complaint while we are working to resolve it.

5.2.4 If we require any further information or evidence from you, the Complaint Handler will contact you as quickly as is reasonably possible to ask for it. We ask that you use reasonable efforts to supply any such information or evidence quickly in order to avoid delaying the complaints handling process. If you are for any reason unable to provide such information or evidence we will use all reasonable efforts to proceed without it, however please be aware that we will not ask for further information or evidence unless we consider it important to the successful resolution of your Complaint.

5.2.5 We aim to resolve Level One Complaints within ten (10) Business Days, however in some cases, particularly if your Complaint is of a complex nature, this may not be possible. If this is not possible for any reason you will be informed of the delay, the likely length of the delay and the reasons for it.

5.2.6 At the conclusion of the Level One complaints procedure, regardless of the outcome, we will provide you with full details of our investigation, our conclusions from that investigation, and any action taken as a result. You will also be reminded of your right to appeal our decision and escalate the complaint to Level Two in the form of an Appeal.

5.3 Level Two:

5.3.1 If you are not satisfied with the resolution of your complaint at Level One, you may appeal the decision within ten (10) Business Days, and have the complaint escalated to Level Two. Appeals are handled by management level members of our team.

5.3.2 Appeals, quoting your original Complaint Reference, should be directed to your original Complaint Handler who will forward the request to an appropriate Appeal Handler. Receipt of Appeals will be acknowledged in writing within four (4) Business Days. When we acknowledge receipt of your Appeal we will also provide details of your Appeal Handler.

5.3.3 If your Complaint relates to a specific employee that person will be informed of your Appeal and given a further opportunity to respond. Any communication between you and the employee in question should take place only via the Appeal Handler and we respectfully ask that you do not contact the employee in question directly concerning the Complaint while we are working to resolve it.

5.3.4 If we require any further information or evidence from you, the Appeal Handler will contact you as quickly as is reasonably possible to ask for it. We ask that you use reasonable efforts to supply any such information or evidence to us quickly in order to avoid delaying the complaints handling process. If you are for any reason unable to provide such information or evidence we will use all reasonable efforts to proceed without it, however please be aware that we will not ask for further information or evidence unless we consider it important to the successful resolution of your Complaint.

5.3.5 We aim to resolve Level Two Complaints within ten (10) Business Days, however in some cases, particularly if your Complaint is of a complex nature, this may not be possible. If this is not possible for any reason you will be informed of the delay, the likely length of the delay and the reasons for it.

5.3.6 At the conclusion of the Level Two procedure, regardless of the outcome, we will provide you with full details of our investigation, our conclusions from that investigation, and any action taken as a result. Our decision at this stage is final, subject to your right to seek External Resolution of your Complaint.

5.3.7 As we are a member of an Alternative Dispute Resolution (ADR) scheme – the Ombudsman Service - you, as our customer, have the right to seek External Resolution of your Complaint from that scheme if you are not satisfied with the outcome of your Level Two Complaint.

5.4 External Resolution:

5.4.1 If you are not satisfied with the resolution of your Complaint at Level Two you may seek External Resolution of your Complaint. For details of complaint and conflict resolution mechanisms available, please use our complaints form. Details of the complaints form can be found below at 8.1.

5.4.2 The contact details of the Ombudsman Service are as follows:

By telephone: 0330 440 1614

In writing: Ombudsman Service, PO Box 730, Warrington, WA4 6WU

By email: osenquiries@os-communications.org

6. Confidentiality and Data Protection

6.1 All Complaints and information relating thereto are treated with the utmost confidence. Such information will only be shared with those employees of the Company who need to know in order to handle your Complaint.

6.2 We may ask for your permission to use details of your Complaint (with your personal details removed) for internal training and quality improvement purposes. If you have given such permission, you may revoke it at any time by completing our complaints form. Details of the complaints form can be found below at 8.1.

6.3 All personal information that we may collect (including, but not limited to, your name and address) will be collected, used and held in accordance with the provisions of the Data Protection Act 1998 and your rights under that Act.

7. Questions and Further Information

7.1 If you have any questions or require further information about any aspect of this Complaints Policy, please detail your questions or the further information you require via our complaints form. Details of the complaints form can be found below at 8.1.

8. Complaints Form

8.1 The Company's complaints form can be accessed online at https://www.cognitoforms.com/BentleyTelecom/ComplaintForm

8.2 Should you require a printed copy of the Company's complaints form, please telephone the Company on +44 (0) 2392 311 118 and the Company shall post

a copy to you. You must provide a full postal address during your initial contact with the Company.

9. Policy Responsibility and Review

9.1 Overall responsibility for this Complaints Policy within the Company and the implementation thereof lies with Matthew Walker, a Director of the Company.

9.2 This Complaints Policy is regularly reviewed and updated as required.