Complaints Handling Policy
(Embedded Network Customers)

1. Purpose

Realm is committed to providing fair, transparent, and accessible complaint handling processes for all customers in embedded networks. This Complaints Handling Policy outlines how Realm receives, manages, resolves, and records complaints in accordance with the AER Exempt Selling Guideline Version 7, the National Energy Retail Rules (NERR), and best-practice standards.

This policy also recognises that Realm often acts as **agent for the embedded network owner**, requiring coordinated handling of complaints to ensure customer concerns are resolved quickly and lawfully.

2. Scope

This policy applies to:
- All residential customers in embedded networks for whom Realm provides billing or customer support.
- All network types: electricity, hot water, thermal energy, and water billing.
- All staff, contractors, and agents acting on behalf of Realm.
- All matters raised as complaints, regardless of complexity.

A complaint is any expression of dissatisfaction relating to Realm's services, actions, performance, billing, or conduct, where a response or resolution is expected.

3. Regulatory Framework

This policy complies with:
- AER Exempt Selling Guideline v7 – Mandatory Condition: Complaints and Dispute Resolution.
- National Energy Retail Rules (NERR) complaint-handling standards.
- Australian Standard AS/NZS 10002:2022 Guidelines for Complaint Management.
- Relevant privacy and consumer protection legislation.

Where Realm acts as agent for an exempt seller (the embedded network owner), Realm ensures complaint processes meet the owner's regulatory obligations as well.

4. Guiding Principles

Realm manages complaints in accordance with the following principles:
- **Accessibility** – multiple channels available for lodging complaints.
- **Fairness** – customers are treated respectfully and without bias.
- **Timeliness** – complaints acknowledged within required timeframes.
- **Transparency** – customers are kept informed throughout the process.

- **Confidentiality** – personal information is protected.
- **Continuous Improvement** – complaint trends are reviewed to improve services.

5. How Customers Can Lodge a Complaint

Customers may lodge complaints through any of the following channels:
- Email: enquiries@realmcorp.com.au
- Phone: 1300 989 438
- Website: realmcorp.com.au/complaints (when launched)
- Mail: Realm, PO Box 153 Nerang QLD

Realm accepts anonymous complaints where sufficient information is provided to assist with investigation.

6. Complaint Handling Process

Realm follows a structured resolution process:

Step 1 – Acknowledgement
- Complaints will be acknowledged within 5 business days.

Step 2 – Investigation
- The complaint is assessed by Realm's Customer Support Team.
- If Realm is acting as agent, the embedded network owner will be consulted where required.
- Complex issues may require additional time; customers will be advised if delays occur.

Step 3 – Resolution
- Realm will provide a written or verbal response outlining findings, actions taken, and outcome.
- Customers will be informed of options if they are unsatisfied.

Step 4 – Escalation
- If unresolved, the complaint may be escalated internally to a senior staff member.
- Realm will provide a final position within a reasonable timeframe.

Step 5 – External Dispute Resolution
- Customers may contact the relevant state/territory Ombudsman.
- Realm will provide Ombudsman details upon request.

All complaints are handled free of charge.

7. Embedded Network Considerations

Because Realm often acts on behalf of the network owner:

- Some complaints may require coordination with the owner (e.g., infrastructure faults, meter access issues).
- Realm will only share necessary customer information with the owner and handle all data in accordance with Realm's Privacy Policy.
- Realm manages complaints expected of an exempt seller unless instructed otherwise by the owner.
- Realm will ensure customers always know who is responsible for resolving their issue.

8. Timeframes for Resolution

Realm aims to resolve complaints within:

- **10 business days** for standard billing or service complaints.
- **20 business days** for complex matters requiring owner or contractor involvement.

If additional time is required, customers will be updated regularly until resolution.

9. Customer Rights

Customers have the right to:

- Lodge a complaint at no cost.
- Be treated with respect.
- Receive clear information about the process.
- Have their complaint investigated fairly.
- Request escalation.
- Access external dispute resolution if unsatisfied with the outcome.
- Have their privacy and personal information protected.

10. Recording, Monitoring & Reporting

Realm will maintain a secure complaints register including:

- Customer details.
- Date complaint was received.
- Summary of the issue.
- Actions taken and resolution.
- Time taken to resolve.
- Any systemic issues identified.

Realm reviews complaint data quarterly to identify trends and improve processes. Significant complaint trends or regulatory issues will be reported to senior management.

11. Staff Responsibilities & Training

Realm staff must:

- Complete annual complaints-handling training.
- Understand obligations under Guideline v7.
- Treat all complainants professionally and respectfully.
- Follow escalation pathways when required.
- Maintain accurate documentation.

Special training is provided for staff dealing with vulnerable customers, including hardship and family violence circumstances.

12. Governance & Review

Realm will review this policy annually or sooner if regulatory requirements change.
Updates will be approved by Realm's Managing Director.
Any material breaches of complaint-handling obligations will be investigated, documented, and, where required, reported to the AER.

13. Version Control

Version: 1.0
Approved by: David Reid, Director
Effective Date: November 2025
Next Review: November 2026