

## COMPLAINTS POLICY (EXTERNAL)

### Policy

NTSCORP Limited (NTSCORP) maintains a Complaints Register as a means by which parties dealing with NTSCORP may formally raise issues they feel have not been dealt with appropriately.

The Complaints Register provides an opportunity to receive and record feedback on the performance of NTSCORP and, if necessary, to remedy perceived poor practices.

Only complaints in writing (including complaints made via email) will be entered in the Register.

### Procedure

#### 1. Handling of Complaints

NTSCORP will maintain a **Complaints Register** which includes the following information:

- i. Date complaint received;
- ii. Name and contact details of person(s) making the complaint;
- iii. Nature of the complaint;
- iv. The resolution or outcome from the complaint; and
- v. The date the complaint is resolved.

All complaints need to be in writing sent to:

**c/o The Chief Executive Officer**

**NTSCORP Limited**

**P.O. Box 2105, Strawberry Hills NSW 2012**

Or via email:

**[complaints@ntscorp.com.au](mailto:complaints@ntscorp.com.au)**

On receipt of a written complaint the CEO will, within 10 working days, write to the originator of the complaint acknowledging receipt with a brief explanation of NTSCORP's action (if any) that will follow.

Where the CEO determines that a complaint is vexatious, frivolous, or made in bad faith, the CEO will provide a response to the complainant confirming that they have determined no

further action is required from NTSCORP and the basis for that decision. By way of example, the CEO may determine no further action is required in circumstances where:

- There have been repeated complaints about the same issue after it has been fully investigated and resolved.
- The complaint is made with malicious intent, such as to harass, intimidate, or damage the reputation of an individual or the organisation.
- The complaint is lacking any factual basis, where allegations are clearly unfounded or fabricated.
- The complaint involves excessive or unreasonable demands including requests for assistance which are outside of NTSCORP's statutory functions as a Native Title Service Provider.

In considering the complaint and determining the appropriate response, the CEO may take into consideration NTSCORP's duty of care to its employees including its obligations to manage risk arising from psychosocial hazards such as conflict, harassment, job demands, and traumatic events.

If there is a need for follow-up action, the CEO will:

- i. Assign an NTSCORP a senior member of staff the task of investigating and reporting on the complaint (**Investigation Officer**); and
- ii. Determine a response date for the report.

A written report by the investigation officer will be forwarded to the CEO, who will in turn respond in writing to the originator of the complaint to explain how the matter has been dealt with and the reasons for NTSCORP' approach to the matter.

If the CEO determines that an NTSCORP staff member has behaved in a manner that justifies the complaint, the CEO will also determine what further action should occur – whether disciplinary action, counselling, formal warning or other action – and by whom the action should be taken.

Where the complaint is about a particular NTSCORP staff member or members(s), that staff member shall not be assigned to be the Investigation Officer. Further, any staff member who has a real or perceived conflict of interest in the matter shall not be assigned to be the Investigation Officer.

As part of preparing the written report, the Investigation Officer may provide the relevant staff member(s) the opportunity to provide information in response to the complaint and may take this information into consideration when preparing their report.

If the complaint relates to the CEO then:

- i. a copy of the complaint shall be provided to all Board members and tabled at the next NTSCORP Board of Directors meeting; and
- ii. the CEO shall be entitled to provide a response to the Board in relation to the complaint.

The Board may determine that the Chairperson will respond in writing to the complainant.

## **2. Maintenance of Complaints Register**

The Complaints Register will be maintained by the CEO who will monitor the handling of complaints.

## **3. Reporting to Board regarding Complaints**

On a quarterly basis, the Board of NTSCORP shall be provided a report providing a high-level summary of complaints entered in the Complaints Register since the Board's previous report on the matter.

## **4. Notification of the Complaints Register**

NTSCORP will publicise the existence of the Complaints Register by the following means:

- i. NTSCORP's website will refer to the existence of the Complaints Register. It will also provide advice on the means of lodging a complaint;
- ii. The existence of the Complaints Register will be brought to the attention of complainants and any other interested parties as necessary, depending on the circumstances.

Michael Bell

Chairperson of NTSCORP Limited

Policy approved by Board: 19.02.2026