

## COMPLAINTS POLICY AND PROCEDURE

ISO 10002-aligned and SIA ACS complaint handling

|             |       |            |            |
|-------------|-------|------------|------------|
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### 1. PURPOSE AND PRINCIPLES

1.1 2012 Security Ltd will make it straightforward to raise a complaint and will handle complaints promptly, fairly and proportionately. The process is intended to resolve issues, retain appropriate evidence and identify useful improvements without creating unnecessary administration.

- complaints can be made through normal contact routes and without charge;
- the response will be proportionate to the seriousness and complexity of the issue;
- complaints will be handled fairly, confidentially and without retaliation;
- complaint information will be used to identify recurring issues and improvement opportunities.

### 2. SCOPE

2.1 This procedure applies to complaints from clients, employees, workers, subcontractors, members of the public, suppliers and regulators concerning Company services or operations.

2.2 A complaint is an expression of dissatisfaction where a response or resolution is expected. Routine service requests, payroll queries or requests for information may be dealt with through normal business processes unless they develop into a complaint.

### 3. RECEIVING AND RECORDING COMPLAINTS

3.1 Complaints may be made verbally, by telephone, email, form or written correspondence. Complaints requiring a response or action must be recorded in CF-02 Complaints Log. A straightforward complaint resolved promptly may be recorded and closed in the log without a separate CF-01 form. CF-01 Complaint Form is used where investigation or formal handling is needed because the matter is serious, repeated, disputed, unresolved or presents a safety, safeguarding, criminal, regulatory or significant client risk.

| Record      | Minimum information                                        |
|-------------|------------------------------------------------------------|
| Reference   | Complaint reference and date received                      |
| Complainant | Name / organisation and contact details where needed       |
| Issue       | Site / service and brief details of the complaint          |
| Owner       | Person handling the complaint                              |
| Outcome     | Action / response and final response or closure date       |
| Follow-up   | Satisfaction and any escalation / review, where applicable |

### 4. HANDLING AND ESCALATION

4.1 One complaint owner will normally manage the complaint from receipt to closure. Complaints should be acknowledged promptly, normally within one working day. Immediate safety, safeguarding, criminal, regulatory or evidence-preservation concerns must be escalated straight away.

### 5. INVESTIGATION AND RESPONSE

- the complaint owner will make checks proportionate to the issue;
- relevant records should be retained where they may be needed;
- people criticised should be given a reasonable opportunity to respond;
- findings, action taken and the outcome should be recorded.

### 6. TIMESCALES AND COMMUNICATION

6.1 The Company aims to provide a final response within 15 working days. If more time is reasonably required, the complainant should be given an update and a revised timescale. The response should explain the outcome and any action taken so far as lawful and appropriate.

6.2 The complainant should, where practicable, be asked whether they are satisfied with the way the complaint was handled and the outcome. A lack of response may be recorded as not known.

### 7. CORRECTIVE ACTION

7.1 Not every complaint requires root-cause analysis or a separate corrective-action process. Where a complaint identifies a nonconformity, repeated or systemic failure, or a significant control weakness, the necessary action will be recorded and managed under the Company's existing quality arrangements, including cause and effectiveness where appropriate.

## 8. REVIEW / APPEAL

8.1 A second manager or Director is only required where the complaint is serious or unresolved, the complaint owner is materially involved, or the complainant asks for a review. Routine complaints do not require a separate reviewer or additional sign-off. Where a review is needed, it should where reasonably practicable be handled by someone not responsible for the original decision.

## 9. MONITORING, RECORDS AND RETENTION

9.1 The Complaints Log will be reviewed periodically for the type and nature of complaints, repeat sites or issues, response times, outcomes and any patterns or trends. Significant themes will be considered at management review. Records will be retained in accordance with the Company retention schedule and applicable legal, regulatory, insurance and client requirements.

## 10. REFERENCES

- ISO 10002:2018 - Quality management - Customer satisfaction - Guidelines for complaints handling in organizations
- ISO 9001 - Quality management systems - Requirements
- SIA Approved Contractor Scheme requirements and ACS self-assessment workbook guidance
- UK GDPR and Data Protection Act 2018
- Whistleblowing and Reporting Concerns Policy

## DOCUMENT CONTROL

|                    |                                            |
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| Reviewer           | TT - Theo Theodorou                        |
| Approver           | Managing Director (MD)                     |
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*Revision date - 1 September 2026: complaints process simplified to a proportionate SME approach. Removed mandatory multi-person review, four-level classification and separate tracking/sign-off steps for routine complaints. Approved and effective 16 September 2026.*