
HAMMERSMITH POLICY

COMPLAINT HANDLING POLICY

Risk, Compliance & Governance Department
Version: 1.0
Effective Date: 6 May 2026

Approved By: Board of Directors
For Internal Use Only
Hammersmith (M) Sdn Bhd

AUTHORS

Name	Role	Department

DOCUMENT HISTORY

Date	Version	Document Revision Description	Document Author
3 rd Apr 2026	0.1	Document Creation	
29 th Apr 2026	1.0	Document Published	
3 rd June 2026	2.0	Document Updated – Removing 2 channels where complaint can be made.	

APPROVALS

Approval Date	Approved Version	Approver Role	Approver
29 th April 2026	1.0	Approved by CEO	LCK
3 rd June 2026	2.0	Approved by CEO	LCK

RELATED DOCUMENTS

Component	Name (with link to the document)	Description

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1 POLICY STATEMENT

Hammersmith (M) Sdn Bhd ("Hammersmith") is committed to maintaining the highest standards of fairness, professionalism, transparency, integrity and accountability in all dealings with consumers.

As a Debt Counselling and Management Agency (DCMA), Hammersmith recognizes that many consumers engaging our services may be experiencing financial hardship and vulnerability. Therefore, all complaints shall be handled fairly, objectively, promptly and without prejudice.

This Policy establishes the framework for receiving, recording, investigating, resolving and reporting complaints in accordance with:

- Consumer Credit Act 2025 (CCA)
- SKP Conduct Standards
- Applicable Consumer Protection Requirements
- Hammersmith Internal Governance Policies
- Personal Data Protection Act 2010 (PDPA)

1.1 OBJECTIVES

The objectives of this policy are to:

1. Ensure consumers have accessible avenues to lodge complaints.
2. Resolve complaints fairly and promptly.
3. Identify root causes of complaints.
4. Prevent recurring issues.
5. Enhance consumer confidence.
6. Protect vulnerable consumers.
7. Support continuous service improvement.
8. Comply with SKP conduct standards and regulatory expectations.

1.2 SCOPE

This policy applies to:

- All DCMA clients
- Prospective clients
- Former clients
- Creditors interacting with DCMA
- Representatives acting on behalf of consumers
- Hammersmith employees
- Financial counsellors

- Associate counsellors
- Third-party service providers
- Digital platform users

2 COMPLAINT MANAGEMENT PRINCIPLES

All complaints shall be managed based on the following principles:

2.1 Accessibility

Consumers may lodge complaints through:

- DCMA Portal
- Website Complaint Form
- Email
- Walk-In
- Written Letter

2.2 Fairness

Every complaint shall be investigated impartially.

2.3 Transparency

Consumers shall be informed of:

- Complaint status
- Investigation progress
- Resolution outcome
- Escalation options

2.4 Confidentiality

All complaint information shall remain confidential and protected under PDPA requirements.

2.5 Non-Retaliation

No consumer shall suffer discrimination, prejudice or adverse treatment for lodging a complaint.

3 RESPONSIBILITIES

a) Board of Directors

- Approve complaint management framework.
- Review complaint trends quarterly.

- Ensure consumer protection objectives are met.

b) Compliance Department

- Policy ownership.
- Complaint governance.
- Regulatory reporting.
- Independent review of escalated complaints.

c) Customer Service Department

- First-line complaint handling.
- Complaint registration.
- Consumer communication.
- Resolution coordination.

d) Operations Department

- Corrective actions.
- Root cause remediation.
- Process improvements.

e) Information Technology Department

- System complaint investigations.
- Platform issue resolution.
- Cybersecurity incident support.

4 COMPLAINT HANDLING PROCESS

4.1 Stage 1 – Complaint Receipt

Upon receiving a complaint:

- Unique Complaint Reference Number generated.
- Complaint recorded in DCMA Complaint Management System.
- Complaint acknowledged.

Service Level

Acknowledgement within:

1 Business Day

4.2 Stage 2 – Assessment & Classification

Complaint shall be categorised according to severity:

Low Risk

Minor service dissatisfaction.

Examples:

- Appointment rescheduling
- Delayed callback

Medium Risk

Operational issues impacting service delivery.

Examples:

- Incorrect information
- Delayed debt proposal submission

High Risk

Potential regulatory breach.

Examples:

- Misrepresentation
- Confidentiality breach
- Unethical conduct

Critical Risk

Significant consumer harm.

Examples:

- Fraud
- Data breach
- Financial loss
- Serious misconduct

4.3 Stage 3 – Investigation

Investigation may include:

- Review of call recordings
- Review of emails
- Review of counselling notes

- Review of system records
- Interviews with staff
- Review of supporting documents

4.4 Stage 4 – Resolution

Possible resolutions include:

- Explanation
- Apology
- Service correction
- Record correction
- Fee refund
- Compensation (where appropriate)
- Staff disciplinary action
- Process improvements

4.5 Stage 5 – Closure

Complaint closure shall only occur after:

- Investigation completed.
- Resolution communicated.
- Consumer informed of escalation rights.
- Case documented.

5 ESCALATION FRAMEWORK

- Level 1:
Customer Service Officer
- Level 2:
Customer Service Manager
- Level 3:
Head of Operations
- Level 4:
Risk & Compliance Department
- Level 5:
Chief Executive Officer
- Level 6:
Board Risk & Compliance Committee

External Escalation:

- Suruhanjaya Kredit Pengguna (SKP)
- Consumer Tribunal (where applicable)
- Relevant Authorities

6 ROOT CAUSE ANALYSIS

All complaints shall be analysed monthly to identify:

- Process failures
- Training gaps
- Technology weaknesses
- Compliance breaches
- Emerging consumer risks

Corrective and Preventive Actions (CAPA) shall be documented and monitored.

7 MANAGEMENT REPORTING

Monthly Reports:

- Total complaints received
- Complaints by category
- SLA achievement rates
- Open complaints
- Closed complaints
- Regulatory complaints
- Repeat complaints

Quarterly Reports:

- Trend analysis
- Root causes
- Compliance findings
- Consumer outcomes

8 Improvement initiatives

Reports shall be submitted to the CEO and Board Risk & Compliance Committee.

9 RECORD RETENTION

Complaint records shall be retained for a minimum of seven (7) years from closure date or such period required by law.

APPENDIX A- Hammersmith DCMA Complaint Handling Service Levels

A1 Complaint Acknowledgement

All complaints received through any channel shall be acknowledged in writing no later than the next business day after receipt.

The acknowledgement must contain:

- Complaint Reference Number
- Date Received
- Complaint Category
- Assigned Officer
- Contact Details
- Expected Resolution Timeline
- Escalation Rights

This requirement applies to:

- Portal submissions
- Email complaints
- Telephone complaints
- Walk-in complaints
- Social media complaints
- Written correspondence

A2 Complaint Classification Framework

All complaints shall be classified into one of six categories prescribed by SKP.

A1.1 Category 1 – Simple Complaint

Definition:

Complaint can be resolved through existing records and does not require investigation involving multiple departments or external parties.

Examples:

- Request for account clarification
- Fee explanation request
- Counsellor communication issues
- Incorrect contact details
- Portal access issues

Service Level:

Acknowledgement:

Next Business Day

Final Resolution:

Within 14 Calendar Days from acknowledgement

A1.2 Category 2 – Complex Complaint (No Third-Party Information Required)

Definition:

Complaint requires detailed internal investigation involving multiple departments but does not require information from external parties.

Examples:

- Alleged incorrect affordability assessment
- Disputed counselling recommendations
- Service delivery failures
- Complaint against counsellor conduct
- Debt management plan calculation disputes

Service Level:

Acknowledgement:

Next Business Day

Final Resolution:

Within 30 Calendar Days from acknowledgement

A1.3 Category 3 – Simple Complaint Subsequently Reclassified as Complex (No Third-Party Information Required)

Definition:

Complaint initially assessed as simple but later determined to require additional investigation.

Examples:

- Fee dispute evolving into service misconduct investigation
- Complaint involving multiple consumer interactions

Service Level:

Acknowledgement:

Next Business Day

Reclassification Notice:

Within 14 Calendar Days

Notice Must Include:

- Revised Resolution Timeline
- Reason for Reclassification

Final Resolution:

Within 30 Calendar Days from original acknowledgement

A1.4 Category 4 – Complex Complaint Requiring Third-Party Information

Definition:

Complaint requires information from external organizations before a final decision can be made.

Examples:

- Credit report disputes
- Creditor communication disputes
- Police investigation matters
- Identity fraud allegations
- Disputed creditor balances

Service Level:

Acknowledgement:

Next Business Day

Initial Investigation Update:

Within 30 Calendar Days

Hammersmith must either:

- (a) Issue final resolution; OR
- (b) Explain why additional time is required.

Third-Party Follow-Up:

Every 7 Calendar Days

Final Resolution:

Within 30 Calendar Days after receipt of complete third-party information.

A1.5 Category 5 – Simple Complaint Reclassified as Complex Requiring Third-Party Information

Definition:

Complaint initially assessed as simple but subsequently requires third-party information.

Examples:

- Incorrect debt balance complaints
- Identity verification disputes
- Fraud-related complaints

Service Level:

Acknowledgement:

Next Business Day

Reclassification Notice:

Within 14 Calendar Days

Third-Party Follow-Up:

Every 7 Calendar Days

Final Resolution:

Within 30 Calendar Days after complete information is received.

A1.6 Category 6 – Unresolved Complaint

Definition:

Consumer remains dissatisfied after final decision.

Examples:

- Consumer rejects outcome
- Consumer disputes investigation findings
- Consumer disputes remediation offered

Service Level:

Within 5 Business Days of unresolved determination:

Consumer must be informed of further recourse options.

These include:

- Suruhanjaya Kredit Pengguna (SKP)
- Financial Markets Ombudsman Service (FMOS)
- Tribunal Tuntutan Pengguna Malaysia (TTPM)
- Tribunal Koperasi Suruhanjaya Koperasi Malaysia (TKSKM)
- Courts of Law

A1.7 Complaint Status Updates

All complainants shall receive updates:

Simple Cases:

At least once before final resolution.

Complex Cases:

Every 14 Calendar Days.

Third-Party Cases:

Every 14 Calendar Days and whenever material developments occur.

A1.7.1 Root Cause Analysis Requirements

For every complaint upheld in favour of the consumer, Hammersmith shall conduct root cause analysis.

Assessment areas include:

- Process Failure
- Staff Conduct
- Technology Failure
- Policy Weakness
- Training Deficiency
- Third-Party Failure

Root cause findings shall be reported monthly to:

- Head of Customer Service
- Head of Compliance
- Head of Risk Management

A1.7.2 Complaint Closure Requirements

A complaint shall only be considered closed when:

- Final decision has been communicated in writing;
- Any remediation has been completed;
- Consumer has been informed of escalation rights; and
- Complaint records have been updated in the Complaint Management Platform.

A1.8 Complaint Handling KPI Framework

The following minimum service levels shall apply.

KPI	Target
Complaint Acknowledgment	100% within Next Business Day
Simple Complaint Resolution	95% within 14 Days
Complex Complaint Resolution	90% within 30 Days

A1.9 Board Reporting

Monthly reporting shall include:

- Total complaints received
- Complaints by category
- Complaints by root cause
- Average resolution time
- SLA compliance rate
- Escalated complaints
- SKP referrals
- Consumer satisfaction scores

Quarterly reporting shall be submitted to:

- CEO
- Risk & Compliance Committee
- Board of Directors