

# **Best Practice Principles Group (BPPG) for Shareholder Voting Research**

## **Feedback and Complaints Procedure**

17 June 2016

### **1 Introduction**

The complaint procedure is designed to ensure that complaints about the Best Practice Principles are properly investigated and are given careful consideration.

All signatories to the Best Practice Principles are committed to ensuring that they:

- Get things right now and in the future if they have not already done so
- Be open and accountable
- Act fairly and proportionately

### **2 Our Remit**

The BPP Committee will consider complaints in respect of

- a) organisations that are members of the BPP Group; and
- b) Which may have breached the Best Practice Principles.

Please review the list of signatories to ensure the organisation in question is a member of the Group.

### **3 Making a Complaint**

Before you submit your complaint you may find it helpful to read the following information which explains the kinds of complaints that the BPP Committee can deal with and what information is required for a complaint to receive consideration.

If you are considering a complaint to the Group, we ask that you first consider:

Sorting out the problem with the organisation directly involved. Complaints can usually be resolved more easily and effectively by those with a direct influence on the situation and at an early stage.

To make a complaint about the Best Practice Principles for Shareholder Voting Research via this website, please [click here](#).

## **4 Who Can Complain?**

The BPP Group will take complaints from any organisation or individual that feels there has been a material non-compliance matter associated with the Principles.

All complaints will be circulated to all members of the Group.

In order to understand the impact of the complaint the Group will need to understand the likely effect of the non-compliance on the persons making the complaint.

## **5 Submitting your Complaint**

In the first instance, you should ensure that you have used the complaints procedure of the relevant organisation before raising the matter with the Group.

The information we need from you when making any complaint is as follows:

- a clear, detailed description of what your complaint is about
- copies of any letters or emails related to the complaint
- your email address or postal address

The Group will aim to respond to complaints within 25 working days. If it is not possible to respond within this time, the Chairman of the Committee will let you know and inform you of when you can expect a reply.

The Group cannot be responsible for determining or adjudicating points of individual report accuracy or differences of opinion over what constitutes “good governance”.

## **6 What Happens Once a Complaint is Received?**

Upon receipt of your complaint we will:

- Acknowledge receipt of the complaint by email
- Investigate your complaint
- Respond to you within the timeframe indicated

## **7 Courtesy & Respect**

You can expect to be treated with courtesy, respect and fairness at all times. We expect that you will also treat BPP Group members dealing with your complaint with the same courtesy, respect and fairness.

The Group will not tolerate threatening, abusive or unreasonable behaviour by any complainant. Such situations are rare, however, in the unlikely event they should happen, the Group reserves the right to cease communication with the complainant as it sees fit.

## 8 List of Remedies

If, after a comprehensive review of the circumstances, the complaint is upheld, the Group or individual organisation involved will

- a) Encourage the Signatory at stake to issue an apology, explaining what happened and/or what went wrong. Any apology is not an acceptance of liability under any legal or regulatory framework
- b) Commit to take remedial action, which may include reviewing or changing the Best Practice Principles
- c) In extreme situations, be considered for expulsion of the Signatory from the BPP Group

## 9 Data Protection

Complaint details, outcomes and actions taken are recorded by us and used for service improvement. We record all complaints we receive and collate data from them to help us understand what types of problems are most prevalent, and how well we are doing to resolve them.

Resolved & Adopted by the Founding Signatories of the BPP Group on 17 June 2016

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