



COMPLAINTS & CLIENT CONCERNS PROCEDURE

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Applies Globally: Subject to applicable local mandatory law

1. PURPOSE

Engineering Projects TM LTD ("EPTM LTD") is committed to handling complaints and client concerns fairly, professionally, transparently and proportionately.

This Procedure establishes a clear route for raising concerns relating to:

- professional services;
 - technical work;
 - consultancy;
 - project management;
 - communications;
 - digital services;
 - commercial matters;
 - privacy;
 - cybersecurity;
 - conduct;
 - service quality.
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2. WHO MAY COMPLAIN?

Complaints may be submitted by:

- clients;
 - prospective clients;
 - authorised representatives;
 - suppliers;
 - consultants;
 - users of EPTM LTD digital services;
 - other persons directly affected by an EPTM LTD service or activity.
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3. WHAT CONSTITUTES A COMPLAINT?

A complaint may concern:

- service quality;
- delay;
- communication;



- technical concerns;
 - contractual issues;
 - professional conduct;
 - confidentiality;
 - privacy;
 - cybersecurity;
 - billing;
 - accessibility;
 - discrimination;
 - other legitimate concerns.
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4. HOW TO COMPLAIN

A complaint should preferably include:

- complainant's name;
- contact details;
- relevant project or service;
- description of the concern;
- relevant dates;
- supporting documents where available;
- desired resolution where appropriate.

Complaints shall be submitted using the contact details published by EPTM LTD through its official website and/or application.

Submission through any official contact channel published by EPTM LTD shall constitute valid submission of a complaint under this Procedure.

5. ACKNOWLEDGEMENT

EPTM LTD shall acknowledge receipt of a complaint.

Acknowledgement shall normally be issued within 7 business days of receipt.

Where exceptional circumstances prevent acknowledgement within that period, acknowledgement shall be issued as soon as reasonably practicable thereafter.

The acknowledgement may:

- confirm receipt;
 - provide a reference number where applicable;
 - identify the person or function handling the matter;
 - request additional information where required.
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6. INITIAL REVIEW

EPTM LTD shall conduct an initial review of every complaint to determine:

- the nature of the complaint;
 - the appropriate person to handle it;
 - whether further information is required;
 - whether immediate action is necessary;
 - whether specialist review is required.
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7. INVESTIGATION

Following the initial review, EPTM LTD shall assess the complaint and undertake an investigation proportionate to the nature, complexity and seriousness of the matter.

The investigation may include review of:

- contracts;
- proposals;
- correspondence;
- drawings;
- technical documents;
- project records;
- communications;
- relevant policies;
- applicable legal requirements.

Where additional information is required from the complainant, EPTM LTD may request such information during the investigation process.

8. INDEPENDENCE

Where reasonably practicable, a complaint shall be reviewed by a person who was not directly responsible for the matter complained about.

Where this is not practicable due to the size or structure of the Company, EPTM LTD shall manage the matter fairly, objectively and proportionately.



9. TECHNICAL COMPLAINTS

Technical complaints may require review by an appropriately competent professional.

Depending on the matter, review may consider:

- design information;
 - calculations;
 - drawings;
 - BIM information;
 - applicable standards;
 - contractual scope;
 - assumptions;
 - technical correspondence.
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10. SAFETY CONCERNS

Safety concerns shall be treated as a priority.

Where a complaint indicates an immediate risk to:

- life;
- health;
- structural safety;
- fire safety;
- public safety;

EPTM LTD shall recommend that the relevant authority, competent professional or emergency service be contacted where appropriate.

11. PRIVACY COMPLAINTS

Privacy complaints shall be handled in accordance with:

- EPTM LTD's Privacy Policy;
 - applicable data-protection legislation;
 - applicable regulatory requirements.
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12. CYBERSECURITY COMPLAINTS

Suspected cybersecurity incidents shall be assessed under EPTM LTD's Cybersecurity & Information Security Policy.



13. RESPONSE

EPTM LTD shall provide a substantive response within **11 business days** of acknowledgement wherever reasonably possible.

Where the complaint is unusually complex or additional investigation is required, EPTM LTD shall provide a status update before expiry of the 11-business-day period and shall continue to provide reasonable progress updates until a substantive response is issued.

The substantive response shall, where appropriate:

- summarise the complaint;
 - summarise the investigation undertaken;
 - state the findings reached;
 - explain the outcome;
 - identify any corrective action proposed;
 - explain any available escalation route.
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14. OUTCOME

A complaint outcome may:

- uphold the complaint;
 - partially uphold the complaint;
 - reject the complaint;
 - require further investigation;
 - propose corrective action;
 - provide clarification;
 - recommend another appropriate process.
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15. CORRECTIVE ACTION

Where a complaint is found to be justified, EPTM LTD may consider:

- correcting an error;
 - revising information;
 - improving communication;
 - undertaking additional technical review;
 - providing clarification;
 - improving internal procedures;
 - staff training;
 - other reasonable corrective measures.
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16. ESCALATION

If the complainant is dissatisfied with the substantive response, the complainant may request escalation within 30 calendar days of the response.

The request should explain why the original response is considered inadequate and provide any additional relevant information.

EPTM LTD shall acknowledge an escalation request within 7 business days.

17. ESCALATED REVIEW

An escalated complaint shall be reviewed by a person with appropriate authority and, where reasonably practicable, by a person who was not responsible for the original decision.

EPTM LTD shall complete the escalated review and issue an escalation outcome within 15 business days of acknowledgement of the escalation request wherever reasonably practicable.

Where additional time is required, EPTM LTD shall provide a progress update and an indicative revised timeframe.

The escalation outcome shall normally constitute EPTM LTD's final internal complaint decision.

18. PROFESSIONAL LIABILITY

Nothing in this Procedure:

- creates a new professional obligation beyond the applicable contract or law;
 - waives contractual rights;
 - waives legal rights;
 - prevents a party from exercising a legal remedy.
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19. CONTRACTUAL DISPUTES

Where a client contract contains a specific dispute–resolution mechanism, that mechanism shall apply to the extent required by the contract.

This Procedure does not replace mandatory contractual dispute–resolution provisions.

20. REGULATORY COMPLAINTS

Nothing prevents an individual from contacting an appropriate regulator or public authority where they have a legal right to do so.

21. NON–RETALIATION

EPTM LTD shall not knowingly retaliate against a person who raises a genuine complaint or concern in good faith.



22. CONFIDENTIALITY

EPTM LTD shall seek to handle complaints confidentially to the extent reasonably practicable and legally permissible.

Complete confidentiality cannot always be guaranteed where disclosure is:

- legally required;
 - necessary to investigate;
 - necessary to protect safety;
 - necessary to defend legal rights.
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23. FALSE OR MALICIOUS COMPLAINTS

EPTM LTD shall distinguish between:

- genuine complaints;
- misunderstandings;
- complaints made in error;
- deliberately false or malicious allegations.

Nothing in this Procedure prevents EPTM LTD from taking appropriate action concerning demonstrably fraudulent or malicious conduct.

24. RECORD KEEPING

EPTM LTD shall maintain appropriate complaint records where reasonably necessary for:

- quality management;
- legal compliance;
- professional accountability;
- service improvement;
- dispute management.

Records shall be retained in accordance with applicable privacy, confidentiality and retention requirements.

25. CONTINUOUS IMPROVEMENT

EPTM LTD shall review complaint information, where appropriate, to identify:

- recurring issues;
 - service improvements;
 - training needs;
 - process improvements;
 - technical lessons learned;
 - risk-control improvements.
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26. GLOBAL APPLICATION

This Procedure is intended to operate globally.

UK law is the principal legal framework.

Where mandatory local law establishes:

- different complaint rights;
- specific response periods;
- mandatory dispute procedures;
- regulatory escalation rights;
- consumer protections;

those mandatory requirements shall prevail where applicable.

27. UNIVERSAL LEGAL COMPLIANCE

This Procedure is a corporate procedure and public compliance document.

EPTM LTD shall seek to comply with mandatory legal requirements applicable to its actual activities and circumstances, within the jurisdiction of The United Kingdom, and outside the jurisdiction of The United Kingdom.

28. SEVERABILITY

If any provision of this Procedure is found to be unlawful or unenforceable, the remaining provisions shall remain effective to the extent permitted by law.
