



**INCM**

*Autoridade Reguladora das Comunicações*

**Divisão de Regulação de Mercados e Estatística**

**Departamento de Protecção do Consumidor**

À Multichoice

Maputo

Nota n.º 724 /INCM/DRME/DEPC/511 /2025

Data: 23 de Junho de 2025

**Assunto:** Confirmação de recebimento da Versão Final da Política de Gestão de Reclamações- Multichoice

Exmos. Senhores,

A Autoridade Reguladora das Comunicações - INCM, acusa a recepção da versão final da **Política de Gestão de Reclamações** submetida a 12 de Junho de 2025, e informamos que tomamos pleno conhecimento do conteúdo do documento.

Agradecemos o envio e comunicamos ainda que a Política foi devidamente homologada pela Autoridade Reguladora.

Sem mais de momento, aproveitamos o ensejo de endereçar os nossos melhores cumprimentos.

**O Administrador Executivo**  
  
Massingue Apala



MultiChoice Africa Holdings (MAH)

**Mozambique**  
**Complaints Management Policy**

**CARE** **CONNECT** **CREATE**

## Table of Contents

1. Purpose	2
2. Policy alignment	2
3. Applicability	2
4. Definitions, Acronyms and Abbreviations (Glossary of terms)	2
5. Roles and Role definitions	3
6. Policy statement	3
6.1. Policy Guiding Principle 1: Workflow	4
6.2. Policy Guiding Principle 2: Escalation	5
6.3. Policy Guiding Principle 3: Refunds and Compensations	6
7. Deviation from the policy	6
8. Non-Compliance	6
9. Document properties	6

## 1. Purpose

The purpose of this policy is to provide guidance on management's complaints of the customers of the CX and Care, in order to ensure a satisfaction of the customers, aiming to:

- Clarify what should be classified as a complaint
- Provide a workflow for handling the Customer's complaint in all of its interactions
- Develop an organizational culture that addresses complaints urgently and with due importance and that identifies opportunities to review processes and/or systems
- Ensuring that the entire resolution process follows privacy rules and ensures fair treatment of employees against whom complaints may have been raised

## 2. Policy alignment

This policy is aligned to:

- Regulation of consumer protection for telecommunications services approved by Decree No. 44/2019 of 22<sup>nd</sup> May

## 3. Applicability

This policy is applicable to MultiChoice Mozambique

## 4. Definitions, Acronyms and Abbreviations (Glossary of terms)

Term	Definition
Business Units (BU)	MultiChoice Mozambique & GOTV Mozambique
Employee	All permanent employees, fixed term contractors and learners on a learnership programme
MAH	MultiChoice Africa Holdings
CX	Customer Experience
Complaint	Any expression of dissatisfaction or discontent regarding an MCM service/product provided to Customers
Complaints Officer	Employee responsible for managing and resolving a complaint
Contact Points	Any MCM channel or customer touch point i.e. Care facing   Assisted Digital and Digital.
<i>Clarity</i>	Customer management's system of MultiChoice
<i>SDH</i>	Social Digital Hub
<i>SMAX</i>	Code automatically generated by the system after an escalation
<i>GDPR</i>	General Data Protection Regulation 2016/679

## 5. Roles and Role definitions

Role	Role definitions
CSR	Customer Service Agent
Team Leader	Customer line agent leader
Manager	First Line Manager
Head	Area executive director
GM	General Manager
Tier 1 Agent	Shop agent (Authorized reseller)
CATI CSR	Customer satisfaction measuring agent
MBD	Mozambique Business Desk - Operations
QA	Quality Assurance

## 6. Policy statement

This policy applies to all complaints received from customers and consumers made over the telephone, in writing, in person or electronically.

CX will be guided by the following principles in the management of customer complaints:

- **Visibility** – information on how and where to complain
- **Accessibility** – the consumer will easily accompany the process of its complaint management
- **Response capacity** – all complaints must receive timely acknowledgement of receipt and the best effort must be made to provide a response within stipulated deadline/timeframes
- **Objectivity** – each complaint will be addressed in an equitable, objective and impartial manner
- **Charges** – no fees will be charged for handling complaints
- **Confidentiality** – information whose senders are identifiable (personal information) must be available when necessary, but only for the purpose of managing the complaint itself within MultiChoice. The complaints investigation process must follow the telecom consumer protection rules as well as the GDPR ensuring that the sender's data will be actively protected from disclosure unless the sender expressly consents to its disclosure
- **Customer focused approach** – a customer focused approach will be adopted and the rights of the customer must always be respected and supported by providing and promoting timely, fair and friendly complaints management
- **Responsibility** – the complaints officer will ensure the systematic reporting of customer complaints to his line of command and
- **Continuous Improvement** – Complaint analysis will drive improvement in customer service and the complaints handling process.

## 6.1. Policy Guiding Principle 1: Workflow

Responsible	Procedure
Customer	Forward the Complaint to MCM, providing, among other data, the name, contact and address. The Complaint can be made in written and/or oral format.
All Points of Contact	All complaints must be registered in the internal system (Clarity). For written complaints, Customer must be provided with a signed and stamped copy containing the reference number assigned when creating the case in Clarity. For complaints made via the electronic platform, a code or reference must be provided to the Customer (this reference must be provided to everyone who submits a complaint extracted from Clarity); Validate the Type of Complaint before submitting it to the CX (Suggestions and opinions must be forwarded to the respective business areas directly without the intervention of the CX)
Customer Service Agent – Customer Line	Whenever a CSR on the Customer Service Line receives a complaint, they should try to manage it in the first contact and try to resolve it as soon as possible. If doubts arise during this process, you should request support from your Team leader for assistance with the areas involved. If it is not within your reach, a SMAX should be created for the MBD with the details of the complaint to facilitate the process
MDB	The operational area, upon receiving a complaint, must investigate and resolve it, if it finds that it is not within its reach to resolve (non-technical issues/disputes) it must forward it by email to the complaints management area so that it can proceed properly
MCM Shops and Agents	All MCM and Tier 1 stores must have a visible complaints book. The supervisor of each store must daily check the complaints/suggestions left by the Customers. In their weekly visits, the local sales representative must validate the complaints made in the book and or guide the Agents who send them by email to <a href="mailto:MozCustomerExperience@mz.multichoice.com">MozCustomerExperience@mz.multichoice.com</a>
CX Team	Receipt of the complaint, contact the Customer to confirm the receipt of the same and validation with the manager for the proper resolution
CX	<ul style="list-style-type: none"> <li>- The Customer must be informed of the receipt of the complaint and, if necessary, request further information related to the complaint;</li> <li>- In case of support send to the relevant areas: Sales, Operations, Marketing, Credit Control and/or Legal Department</li> <li>- All complaints must be answered within a period not exceeding 15 working days after receipt of the same.</li> <li>- All complaints must be dealt with on a first-come, first-served basis, except in cases that prove to be significantly urgent</li> </ul>

**Note:** whenever there is a complaint about the service provided on the Customer's line, the receiver of the complaint must forward the question to the CX Team, which in turn must request the call in question from QA with the history of the call in question

Responsible	Service Level Agreement - SLA	Reports
Electronic Platform	The electronic platform for handling complaints must include: legible name of the worker receiving the complaint, date and time of the complaint, type of service and summary of the complaint	Monthly
Complaint Processing	The CX and Care department, upon receipt of the complaint, must analyse and send it to support areas, in case of need for additional information - This process should not exceed 24 hours The relevant areas, upon receipt of the complaint, must respond within the following 24 hours (technical areas or issues that require further investigation will have a deadline of 48 hours) In the case of reimbursement, an opinion must be prepared by the CX officer containing all the information of the complaint and all relevant areas must validate within 24 hours in cases of execution of reimbursements, or credit note, credit reversal, or credit in account, operations may not exceed 72 hours after their determination	Complaints Received
Resolution	The CX officer must document and inform the sender of the resolution of their complaint The CX officer must check with the other departments to ensure that the Customer's issue has been resolved and, whenever possible, that it does not recur. The CX officer will be responsible for contacting the Customer once a month (for 3 months) to follow up and ensure Customer satisfaction	Input channels  Allocated issues  Response time of the areas for resolution of the same  <i>*Will be used a Complaints management Tracker</i>

## 6.2. Policy Guiding Principle 2: Escalation

In the unlikely event that response deadlines are not met by relevant departments as stipulated in the SLA, the following escalation rule shall apply:

- **Area Manager** - as soon as the agreed service is not delivered satisfactorily or the resolution time is not respected
- **Executive Director of the Department** - if the Area Manager does not respond within 24 hours

- **Area Director:** in all cases not provided for in the previous points and whenever necessary. In any of the cases mentioned above, the complaint must be resolved within a period of 15 (fifteen) working days from the date of receipt of the Customer's complaint.

### 6.3. Policy Guiding Principle 3: Refunds and Compensations

- After any and all investigations, whenever a failure on the part of MultiChoice is detected, resulting from processes, employee behaviour and/or system failures, reimbursement and/or compensation must be made within a maximum period of 30 days ( from the date of receipt of the customer's complaint).

A reason must be made to the competent departments reporting what happened, attaching the complaint. For internal measurements, the relevant areas must be contacted later

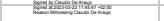
## 7. Deviation from the policy

Any in country adaptions and deviation from this policy should be discussed with the initiator of this policy.

## 8. Non-Compliance

Any company or business unit, including individuals who are subject to this policy, found not to comply with the provisions as set out herein or any amendment thereto, shall be subject to appropriate disciplinary and legal action.

## 9. Document properties

MultiChoice Group		Document Number		
		RoA-MOZ-CG-POL-012		
Complaints Management Policy		Effective Date		
		01/Jun/2022		
	Name Surname	Position	Signature	Date
Initiated by:	Olga Tavares	CX Manager		
Reviewed by:	Cláudia Mabote	Head of CX and Care		
	Cláudio De Araujo	Head of Sales		
	Paulo Mavie	Head of Operations		
	Jovita Fazenda	Regulatory Manager		
	Manuel Nhina	Legal Counsel		
	Alzira Manejo	HR Manager		
	Dickson Chauque	Risk and Compliance Manager		
	Natasha Baghas	Regional Head of CX and Care		
Approved by:	Agnelo Laice	General Manager		

Rev. No.	Rev. Date	Section/s	Description of Change
1	20/May/2022	All	Review