11. Dispute Resolution Policy

Dispute Resolution System:

Our Dispute Resolution Plan comprises:

1. an Internal Dispute Resolution **(IDR)** procedure that meets the requirements of ASIC standard **RG271** and **s912A (1)(g)** of the Corporations Act 2001. RG271 and s912A(1)(g) apply to retail clients;

2. an IDR procedure to provide effective, fair and timely complaints management; and

3. membership of Australian Financial Complaints Authority (AFCA).

What is a "complaint"?

ASIC defines a complaint as:

> *"[An expression] of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required*".

A complaint includes a comment of dissatisfaction posted on social media where the social media account is owned or controlled by us. There is a further requirement that the author of the social media complaint is both identifiable and contactable.

How we receive and deal with complaints:

1. We **recognise a complaint** if a client contacts us and we determine that they have a grievance about their situation. We also recognise a complaint if we become aware of a post of dissatisfaction on social media. All staff and authorised representatives are trained to identify a complaint and are aware they must immediately refer any complaints they become aware of to our Compliance Committee. If unsure whether the client has made a complaint as opposed to an enquiry for information, staff will engage with the client to clarify;

2. Details of **all complaints** are entered into our **Complaints Register** including details of what can be done to resolve the matter and the timetable for resolution. This includes complaints that have been immediately resolved during the initial phone call. Our Compliance Committee will then coordinate activities aimed at resolving the complaint.

3. The **complaint is acknowledged.** The client is requested to provide their outline of the basis of complaint, preferably in writing, and their desired pathway to resolution;

4. The **complaint is assessed** by our Compliance Committee and a written **IDR notice** sent to the client. The IDR notice must include the final outcome of the client's complaint, their right to complain to AFCA, and AFCA's contact details. If the final outcome is to reject or partially reject the complaint, the IDR response must clearly identify the reasons for that outcome;

5. Participation in the AFCA External Dispute Resolution (EDR) process as required;

6. Regular internal checks to monitor outstanding/unresolved complaints.

When will we not provide an IDR notice:

Complaints closed within 5 business days do not require an IDR notice provided the complaint has been resolved to the client's satisfaction, or the client has been given an explanation and/or apology when the firm can no longer take further action to reasonably address the complaint.

However, this exception does not apply if the client requests a response or if the complaint is about a hardship.

The maximum time frames we apply when dealing with client complaints:

1. We will **Acknowledge a complaint within 24 hours or one business day** of receiving it, or as soon as practically possible.

2. We will **Respond to a complaint** with a written IDR notice **within 30 calendar days** of complaint receipt or identification.

3. If a complaint is lodged with AFCA without first going through our IDR process, and is then referred back to us, the timeframe commences when we receive notification from AFCA.

4. There are some exceptions to the 30-day response time. These include if the complaint is particularly complex or there are circumstances beyond our control (for example, we are waiting for a client to provide further details). In these circumstances, an IDR delay notification will be sent to the client explaining the reasons for the delay and we will request an extension of time from ACFA (up to 14 days).

The remedies we offer for resolving complaints:

1. Full investigation into the complaint in line with the process described above;

2. Reinstatement of client to pre-transaction position where appropriate.

How we record and monitor complaints and use this information to identify and address recurring or systemic issues:

3. Maintenance of a Complaints Register;

4. Review of Complaints register by the Compliance Committee at least quarterly for details of all complaints, including those that have been resolved. Complaints that may indicate a potential systemic issue or a breach to be marked with a red flag;

5. The management of any systemic issues identified is the responsibility of the Board. Accordingly, metrics of complaints should be notified to the Board on a regular basis. Staff are encouraged to notify the Board of possible systemic issues or breaches as soon as they are identified. The Board will take an active role in monitoring IDR management, the improvement of IDR performance and investigation of ways to reduce future incidence (e.g., training, process variation).

Formal guidance we provide to our clients in relation to complaints handling:

Financial Services Guides (retail clients) and Services Guide Wholesale Investors (wholesale clients) contain details of our complaints handling process including AFCA membership.

Who is AFCA and what complaints do they handle?

The Australian Financial Complaints Authority (AFCA) provides a free and independent External Dispute Resolution (EDR) scheme to consumers and small businesses.

AFCA can consider complaints about certain investments (including managed discretionary accounts) as well as financial advice received. AFCA does not consider complaints that only concern investment performance (there are some exceptions to this, for example complaints about non-disclosure or misrepresentation).

There are monetary restrictions on AFCA's jurisdiction for handling complaints. As of 1st January 2024, the amount claimed may not exceed $1,263,000.

Further information about the types of complaints AFCA can consider and the outcomes AFCA can provide can be found on their website www.afca.org.au