

DISPUTE RESOLUTION

A complaint is defined in AS/NZS 10002:2014 and ratified by ASIC 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.”

To provide continued excellent customer service, we highly value customer-friendly and efficient complaint handling by all Representatives.

Our internal process

To ensure we continue to provide excellent customer services AND to comply with ASIC’s RG271: Internal Dispute Resolution, we have an internal dispute resolution process which must be followed by all staff and Authorised Credit Representatives.

Our process, as per RG271, deals with potential complaints made by all ‘retail customers’ which as minimum is defined as consumers, primary producers and small business with less than 100 employees at time of act resulting in complaint. I.e. it is not only applicable to regulated credit assistance.

All actions in dealing with complaints must be handled honestly, fairly and lawfully. We, as a business, approach complaints and the process of resolving them in a positive manner; seeing this as an opportunity to enhance our offering to customers. Any hostile, rude or dishonest approach to resolving complaints will not be tolerated.

Our internal procedure is referred to in our Credit Guide and our documented internal process must be provided to any client who requests a copy.

Oral complaints

All complaints must be handled in a customer-friendly manner and with an intent to resolve where possible.

Any oral complaint not able to be resolved by the receiving team member must be referred to our Complaints Officer and/or Complaints Officer/Responsible Manager as soon as practically possible. The complainant’s name and contact details must be collected and passed on as part of this referral.

If it is deemed inappropriate for the Complaints Officer/Complaints Officer/Responsible Manager to handle the complaint directly (i.e. conflict is with him or her and not likely to be efficiently resolved), then this process should instead apply to a nominated senior team member as a substitute.

The process:

- Once advised, the Complaints Officer/Complaints Officer/Responsible Manager will deal with the complainant over the phone within a maximum timeframe of 24 hours.
- The Complaints Officer/Complaints Officer/Responsible Manager will provide the complainant their name, role in business and contact details.
- The complainant will be given the opportunity to explain the situation from their perspective and why they are dissatisfied.
- If the Complaints Officer/Responsible Manager is not able to resolve the complaint over the phone, they should politely suggest that the complainant put the complaint in writing via email, post, or facsimile.
- All updates and outcomes should be promptly (within 48 hours max.) documented within the Complaints Register by the Complaints Officer/Responsible Manager.

Written complaints

All complaints must be handled in a customer-friendly manner and with an intent to resolve where possible.

All written complaints must be referred to the Complaints Officer/Responsible Manager immediately. If it is deemed inappropriate for the Complaints Officer/Responsible Manager to handle the complaint directly (i.e. conflict is with him or her and not likely to be efficiently resolved), then this process should instead apply to a nominated senior team member as a substitute.

The process:

- The Complaints Officer/Responsible Manager will immediately record these details into the Complaints Register:
 - a) Name of complainant.
 - b) Date received.
 - c) Person involved.
 - d) Description of complaint.
 - e) Actions taken to try and resolve.
 - f) Status or outcome, date resolved and whether there is EDR or PI insurer involvement.
- Once registered and within 24 hours since the complaint was initially received, the Complaints Officer/Responsible Manager will send a written acknowledgement to the complainant, using the same medium that complaint was received or in a manner requested by complainant. The acknowledgement to complainant will include:
 - a) Confirmation of receipt.
 - b) Name, role, and contact details of the Complaints Officer/Responsible Manager.
 - c) Confirmation that an investigation of the complaint has begun with the intent of resolving within no longer than 30 days.
 - d) The details of our external dispute resolution contact details and our membership number; explaining that whilst we would like to resolve internally, they do have the right to contact the EDR service directly should they prefer.
- The Complaints Officer/Responsible Manager should consider the complaint within 7 days from receipt and seek to address directly with the complainant with an intent to resolve asap.
- All updates and outcomes should be documented within the Complaints Register, by the Complaints Officer/Responsible Manager, and where possible, the complainant should acknowledge resolution.
- If the complaint cannot be resolved within 30 calendar days via our internal processes, the Complaints Officer/Responsible Manager must advise the complainant in writing that they should deal directly with our external dispute resolution scheme. This should also be noted in the complaint register.
- This response, again within a maximum of 30 days from date of complaint being received, must be in writing and using the same medium that complaint was received or in a manner requested by complainant. The acknowledgement to complainant will include:
 - o The outcome of the internal complaint investigation, including steps and decisions taken.
 - o Explanation of decision made, measured against complaint made and investigation taken.
 - o The complainant's right to contact AFCA, including our membership number and AFCA's contact details, should they not be fully satisfied with the outcome of IDR.
- If a complaint has been resolved to the complainant's full satisfaction within the 5th business day of receipt and the complainant has not explicitly requested a written response, one is not necessary. In all other circumstances, a written response as per above applies.

Remedies

The Complaints Officer/Responsible Manager must act fairly and should offer compensation if deemed reasonable. Only s/he can offer compensation. All outcomes must be recorded in our Complaints Register.

Monitoring & Reporting

The Complaints Officer/Responsible Manager should review the Complaints Register from time-to-time and at least half-yearly. If common issues are occurring, address via training or updated processes. In the same interval, results of the review should be reported to Senior Management including Board Members where applicable. All personal information relating to complaints must be kept private and confidential.

The Internal Dispute Resolution process should be reviewed annually as part of our ACL renewal process and updated if necessary.

Training

All staff and authorised credit representatives must be made aware of this policy and applicable process. This training will be conducted as part of onboarding all new representatives and then as needed.

Any staff/ACRs directly involved in the complaint handling process must have more detailed and regular training, including awareness of the regulatory requirements and knowledge of AFCA's processes.

External Dispute Resolution

We are a member of AFCA, membership number 71213.

The Complaints Officer/Responsible Manager is responsible for keeping the membership up-to-date and for any required liaison with AFCA and ASIC, including advice of any new Credit Representative details within 15 business days, any change in the details of or a revocation of the appointment of a Credit Representative within 10 business days (including when a Credit Representative changes their EDR scheme membership) and of any change to our External Dispute Resolution membership within 10 days of occurring (or within 3 business days if our membership ceases).

If external legal assistance is required, this should be arranged by the Complaints Officer/Responsible Manager.

Authorised Credit Representatives

All Authorised Credit Representatives and their actions fall within the responsibility of us, the licensee. They must follow all aspects of this policy and our internal processes.

Regardless, by regulatory requirements, they must arrange and maintain separate membership of an ASIC-approved External Dispute Resolution scheme. Details, including changes, must be advised to our Complaints Officer/Responsible Manager who will keep up-to-date records in the Representative Register.

External Visibility

All ACLs must have a publicly available and readily accessible complaints policy. This policy must include:

- a) How a customer may lodge a complaint internally with the firm.
- b) The options available to assist complainants who may need additional assistance in lodging a complaint.
- c) The key internal steps undertaken to deal with complaints received including IDR steps, response timeframes and AFCA details where a complaint cannot be resolved.

The complaints policy and our membership of AFCA must be detailed in our Credit Guide and if applicable, on our website in an accessible location.