

COMPLAINTS HANDLING POLICY & PROCEDURES

**Equity-One Mortgage Fund Limited
ACN 106 720 941**

TABLE OF CONTENTS

1	General	2
	1.1 Document overview	2
	1.2 Definitions	2
	1.3 Introduction	2
2	Complaints Handling Policy	3
	2.1 IDR standards	3
	2.2 Requirements for a complaint handling procedure	4
	2.3 Complaints handling principles	4
	2.4 Roles and responsibilities	5
3	Complaints Handling Procedure	5
	3.1 Procedure overview	5
	3.2 Lodging a complaint	6
	3.3 Procedure for receiving complaints	6
	3.4 Managing complaints	6
4	Investigating complaints	6
	4.1 When investigating a complaint, the Complaints Officer must:	6
	4.2 Handling complaints	7
	4.3 IDR Response	7
	4.4 Escalation process	8
	4.5 EDR contact details	8

1 General

1.1 Document overview

This document describes the Complaints Handling Policy and Procedure for the Licensee, and the adopted framework for the effective management of complaints received in a manner acceptable to both the Licensee and its stakeholders.

1.2 Definitions

Definition	Description
AFCA	Australian Financial Complaints Authority, the external dispute resolution (EDR) body for financial services.
AFSL	Australian Financial Services Licence
ASIC	Australian Securities and Investments Commission
Complainant	A person, organisation or its representative, making a complaint
Complaint	An expression of dissatisfaction made to or about the Licensee, 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.
Corporations Act	Corporations Act 2001 (Cth)
Dispute	A complaint which has been escalated due to factors of time, severity, inadequate response, and / or source of complaint
External Dispute Resolution (EDR)	Process where independent and impartial bodies investigate disputes between the complainant and the Licensee. The Licensee is a customer of AFCA.
IDR	Internal Dispute Resolution
Licensee	Equity-One Mortgage Fund Limited (ACN 106 720 941, AFSL 277318)

1.3 Introduction

As an AFSL holder, the Licensee is required by section 912A(2) of the Corporations Act to put in place an Internal Dispute Resolution (**IDR**) procedure and provide access to Australian Financial Complaints Authority (**AFCA**), the External Dispute Resolution (**EDR**) scheme to deal with complaints made by retail clients (but not wholesale clients). These procedures are described in this policy and procedure document. The policy and procedures have been developed having regard to the ASIC Regulatory Guide 271 *Internal dispute resolution* (RG 271) and Australian Standard - Guidelines for complaint management in organisations (AS/NZS 10002:2014).

The Licensee recognises the importance of complying with the ASIC standards and understands that from time to time Investors, Borrowers or third parties will experience dissatisfaction with a product or service.

2 Complaints Handling Policy

2.1 IDR standards

In accordance with RG 271 and AS/NZS 10002-2014, the Licensee's complaint handling procedure reflects the following standards :

- (a) Commitment and culture
 - (i) commitment to the process from senior management level; and
 - (ii) openness to receiving complaints and demonstrate a commitment to resolving complaints through action.
- (b) Enabling complaints
 - (i) visibility of how and where complaints can be made (internally/ externally);
 - (ii) access and assistance are available to all customers; and
 - (iii) no fees (charges) applied for complaint resolution.
- (c) Resourcing
 - (i) adequate resources allocated to complaint resolution; and
 - (ii) all staff understand their roles and responsibilities in relation to the IDR process and are regularly trained.
- (d) Responsiveness
 - (i) prioritise complaints according to the urgency and severity of the issues raised;
 - (ii) be customer-focussed approach to resolving complaints;
 - (iii) acknowledge complaints in accordance with the requirements;
 - (iv) adopt a range of flexible complaint management approaches that promote early resolution;
 - (v) have a broad range of appropriate remedies available;
 - (vi) issue IDR responses within maximum IDR timeframes; and
 - (vii) implement complaint resolution outcomes in a timely manner.
- (e) Objectivity and fairness
 - (i) demonstrate of fairness, independence, objectivity and have an equitable manner in how complaints are addressed; and
 - (ii) protect complainants' confidentiality.
- (f) Policy and procedures
 - (i) readily available public complaints policy;
 - (ii) documented internal complaint management procedure; and
 - (iii) regular review of the adequacy of complaint management documentation, including the complaints policy and internal procedure.

- (g) Data collection, analysis and internal reporting
 - (i) record all complaints received; and
 - (ii) analyse complaint data regularly and provide reports to senior management and the firm's board.
- (h) Continuous improvement
 - (i) monitor and review the performance of the IDR process;
 - (ii) identify and address systemic and recurring problems; and
 - (iii) conduct regular compliance audits to identify and address issues of non-conformity with RG271 and internal requirements.

2.2 Requirements for a complaint handling procedure

The Licensee's complaint handling procedure should address the following requirements:

- (a) the definition of 'complaint' and the types of matters that must be dealt with in accordance with the IDR requirements;
- (b) proactively identifying and assisting complainants who might need additional assistance;
- (c) acknowledging complaints;
- (d) assessing and prioritising complaints according to the urgency of the issues raised;
- (e) dealing with unreasonable complainant conduct;
- (f) investigating complaints, conducting negotiations and exploring resolution options, including appropriate remedies;
- (g) providing an IDR response within maximum IDR timeframes;
- (h) the content of IDR responses, including reasons for decision;
- (i) closing complaints;
- (j) identifying and escalating systemic issues and complaint trends; and
- (k) reporting internally about complaints.

2.3 Complaints handling principles

Throughout the complaint handling process, the Licensee commits to the following principles:

- (a) to act fairly and reasonably:**
 - (i) listen to the complainant's concerns;
 - (ii) be efficient and fair;
 - (iii) only ask for and take into account relevant information when resolving a complaint;
 - (iv) where an error or mistake in handling the customer's complaint is identified, the Licensee will recognise this and immediately initiate action to correct it;
 - (v) give the complainant adequate opportunity to make their case;

- (vi) when relevant, provide information on the progress of the complaint; and
 - (vii) in the case where the complainant is not satisfied with the proposed resolution, provide details of an EDR scheme.
- (b) to act consistently and ethically:**
- (i) all complaints must be treated as legitimate and investigated without prejudice;
 - (ii) confirm the agreed resolution and, where requested/required, provide the complainant with a copy of the agreement/documentated resolution; and
 - (iii) strive to resolve complaints in a consistent manner.
- (c) to inform complainants of External Dispute Resolution (EDR) bodies:**
- (i) notify retail clients in the FSG and Credit Guide of access rights and contact details of EDR, which is AFCA; and
 - (ii) in the case where the complainant is not satisfied with the proposed complaint resolution, the Licensee will inform the complainant of the details of AFCA.

2.4 Roles and responsibilities

This policy and procedure document is owned by the Complaints Officer. The Complaints Officer is responsible for the resolution of complaints. The Complaints Officer administers the complaints process.

The Complaints Officer must acknowledge a complaint within one business day of receiving it, or as soon as practicable.

The Complaints Officer must be notified of all complaints within seven days of receipt of the complaint.

3 Complaints Handling Procedure

3.1 Procedure overview

The IDR procedure comprises the following steps:

- (a) Lodging a complaint – the point of entry
- (b) Receiving a complaint – how the Licensee becomes aware of a complaint
- (c) Recording a complaint – the first step to managing and resolving a complaint
- (d) Managing a complaint – the necessary steps to resolve a complaint
- (e) Written resolution of a complaint – how to deal with a resolved complaint
- (f) Escalation – how to deal with an unresolved complaint
- (g) Referral to an EDR – how to deal with a complaint that cannot be resolved internally or within the given timeframe

The following sections describe each of these steps in detail.

3.2 Lodging a complaint

The following table provides information on how a complainant can lodge a complaint with the Licensee.

How	Details
Telephone	03 9602 3477
Writing	Equity-One Mortgage Fund Limited ACN 106 720 941 Level 13, 256 Queen Street Melbourne VIC 3000
Email	admin@equity-one.com

A complaint may also be made on social media where the person making the complaint is both identifiable and contactable. This could include Equity-One's LinkedIn, Twitter, Facebook or Instagram pages. Where a negative review is left on Google, the Licensee will make an attempt to identify and contact the person making the complaint.

3.3 Procedure for receiving complaints

For complaints received via email, the Complaints Officer will be responsible for managing complaints received through admin@equity-one.com.

For complaints received via Equity-One's LinkedIn, Twitter, Facebook or Instagram pages, the Complaints Officer will be responsible for assessing if it is a complaint and attempting to identify and contact the complainant.

3.4 Managing complaints

The Licensee manages complaints to ensure complaints are dealt with appropriately, in a timely manner, and as far as possible, to the complainant's satisfaction. This process involves investigating, handling, resolving or escalating the complaint.

The Licensee must provide a response to a complainant no later than 30 calendar days after receiving the complaint, however, if complaints involve financial hardship then no later than 21 calendar days after receiving the complaint. Exceptions apply if there is not sufficient information to make a decision, or if an agreement is reached with the complainant.

Where the complaint is made on the social media channel or account owned or controlled by the Licensee, the Complaints Officer will be responsible for assessing if it is a complaint (the complainant is both identifiable and contactable) and in turn contacting the complainant.

4 Investigating complaints

4.1 When investigating a complaint, the Complaints Officer must:

- (a) locate all relevant information and documentation relating to the complaint;
- (b) conduct a full review of all relevant documentation;
- (c) determine if policies, procedures, documentation, training or advisor behaviour contribute to the complaint.

4.2 Handling complaints

The Licensee will make a decision on a customer's complaint within 30 days of receipt. However, in some cases, the Licensee may request more time from the complainant to complete the investigation before making a decision.

If the Licensee does not have sufficient information about a hardship notice to make a decision, it can request the information no later than 21 calendar days after receiving the complaint. The complainant must provide the information within 21 calendar days of receiving the request. Once the Licensee has received the requested information it has a further 21 calendar days to provide a response.

If an agreement is reached about a hardship notice, the Licensee has 30 calendar days to confirm the terms or conditions in writing.

4.3 IDR Response

An 'IDR response' is a written communication from the Licensee to the complainant, informing them of:

- (a) the final outcome of their complaint at IDR (either confirmation of actions taken by the firm to fully resolve the complaint or reasons for rejection or partial rejection of the complaint);
- (b) their right to take the complaint to AFCA if they are not satisfied with the IDR response; and
- (c) the contact details for AFCA.

If the Licensee rejects or partially rejects the complaint, the IDR response must clearly set out the reasons for the decision by:

- (d) identifying and addressing the issues raised in the complaint;
- (e) setting out the Licensee's findings on material questions of fact and referring to the information that supports those findings; and
- (f) providing enough detail for the complainant to understand the basis of the decision and to be fully informed when deciding whether to escalate the matter to AFCA or another forum.

The Licensee is not required to provide a complainant with a response within the relevant maximum IDR timeframe if the following circumstances exist:

- There must be no reasonable opportunity to provide the IDR response within the relevant maximum IDR timeframe because:
 - (g) resolution of the individual complaint is particularly complex; and/or
 - (h) circumstances beyond the Licensee's control are causing complaint management delays.
- Before the relevant maximum IDR timeframe expires, the Licensee must give the complainant an 'IDR delay notification' that informs the complainant about:
 - (i) the reasons for the delay;
 - (j) their right to complain to AFCA if they are dissatisfied; and
 - (k) the contact details for AFCA

The Licensee does not need to provide an IDR response to a complainant if it closes the complaint by the end of the fifth business day after receipt because the Licensee has:

- (l) resolved the complaint to the complainant's satisfaction ; or
- (m) given the complainant an explanation and/or apology when the Licensee can take no further action to reasonably address the complaint.

4.4 Escalation process

In case there is no resolution of the complaint within 30 days, or if the complainant wishes to do so, the complaint can be referred to AFCA.

The Licensee is required to advise the complainant or third party of the services of AFCA.

4.5 EDR contact details

Contact details for AFCA:

Australian Financial Complaints Authority (AFCA)

GPO Box 3

Melbourne Vic 3001

Telephone: 1800 931 678 (between 9:00am and 5:00pm AEST)

URL: www.afca.org.au

Email: info@afca.org.au