



Complaints & Internal Dispute Resolution Policy

COMPLAINTS & INTERNAL DISPUTE RESOLUTION (IDR) PROCESS

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1. INTRODUCTION

AFS licensees must have a dispute resolution system that consists of:

- an Internal Dispute Resolution (IDR) procedure that complies with the standards and requirements made or approved by ASIC (set out in this guide) that cover complaints made by retail clients in relation to the financial services provided; and
- membership of the Australian Financial Complaints Authority (AFCA).

AFS licensees must also comply with their IDR procedure.

DomaCom Australia Limited (DomaCom) ABN 33 153 951 770 Australian Financial Service License No. 444365 (AFSL) is the Fund Manager of the DomaCom Fund ARSN 167 020 626 (Fund).

The Trustee and the Issuer of Interests in the Fund is Melbourne Securities Corporation Ltd ABN 57 160 326 545, AFSL No. 428289 (MSC).

DomaCom's internal dispute resolution procedures ("**IDR Procedures**") are in accordance with Australian Standard AS ISO 10002-2018.

This policy describes the systems that DomaCom has in place for managing and resolving complaints and disputes in relation to the financial services it provides.

Definition of "Complaint"

[An expression] of dissatisfaction made to or about an organization, 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.

Acknowledgement of "Complaint"

DomaCom shall acknowledge the receipt of any complaint, which will be made within 24 hours (1 business day) or if not possible as soon as practicable. All complaints received shall be recorded.

In compliance with its obligations as a Financial Services provider, DomaCom has prepared this policy, as ASIC requires that Financial firms must have a dispute resolution system that consists of:

- an internal dispute resolution (IDR) process that meets the standards or requirements made or approved by ASIC; and

- membership of the Australian Financial Complaints Authority (AFCA)

2. SUMMARY OF POLICY

DomaCom is committed to excellent customer service and the resolution of any concerns or complaints quickly, fairly and efficiently. To enhancing customer satisfaction by we have created a customer-focused environment that is open to feedback (including complaints), resolving any complaints received, and enhancing DomaCom's ability to improve its products and services, including customer service.

- We welcome complaints as a positive means of reviewing and improving our customer services. All complainants will be treated with respect, courtesy and consideration.
- Our internal dispute resolution scheme is open to anyone who deals with us: customers, dealers, advisers, contractors or any other person.
- All staff and representatives are expected to inform complainants about our IDR processes as soon as they become aware of a concern, to give high priority to resolving complaints quickly and to assist any complainant through the process.

3. INTERNAL DISPUTE RESOLUTION

3.1 Receiving and dealing with complaints

- Complaints may be made in writing to, or by phoning, the Complaints Officer at:

Email: complaints@domacom.com.au
Phone: 1300 365 930

- The process for making complaints is outlined in this Internal Dispute Resolution Policy.

3.2 Timeframes for dealing with complaints

- DomaCom will let you know that we have received your complaint as soon as we can. endeavour to respond to all complaints within 5 business days by informing the complainant that their complaint has been received.
- DomaCom will endeavour to resolve a complaint within a maximum of 21 days from the date it confirmed that it had received the complaint to the complainant, but a shorter period if possible.
- If DomaCom cannot resolve a complaint within 21 days, DomaCom will inform the complainant that they have been unable to resolve the dispute, and

the complainant may wish to start mediation with an external mediator appointed by DomaCom.

3.3 Resolving complaints

- DomaCom will endeavour to address all aspects of the complaint that can be resolved via remedies and will provide follow-up assistance where appropriate.
- DomaCom will, where appropriate, offer remedies to complainants that are both non-financial as well as, or instead of, financial remedies. Such remedies may include but are not limited to:
- financial assistance (e.g. arranging for the Account holder to access additional services to the value of the agreed loss or damage);
- other assistance (e.g. where there has been unauthorised or mistaken transactions relating to the facility or loss or theft of the device (if any) through which the facility is used);
- compensation; or
- Where a financial remedy is considered appropriate in the circumstances, DomaCom will seek to offer compensation that is fair.
- In determining the most appropriate remedy, DomaCom will take into consideration any direct loss or damage suffered by the complainant as well as any relevant legal principles, relevant codes of conduct, fairness and relevant industry best practice.
- In dealing with a complaint, DomaCom may, in appropriate circumstances, offer remedies to other parties who have suffered in the same way as the complainant, but did not make a formal complaint.
- Any material given to the complainant explaining IDR Procedures will be provided free of charge.
- Any complaint about a service will be handled by DomaCom free of charge (subject to statutory requirements).

3.4 Recording and monitoring complaints

- When a complaint is first received, the Complaints Officer will enter all information concerning the complaint into the complaints register attached as Annexure A and Annexure B. Any additional correspondence from the complainant must also be recorded in the complaints register;
- The information contained in the complaints register will comply with the National Privacy Principles. DomaCom will inform individuals of what sort of personal information is held and for what purposes, including the method of collection, storage, use, accuracy and disclosure of information;

- The Complaints Officer will be responsible for any trend analysis with respect to complaints. This may assist in identifying any systemic issues that may require remedial action;
- The Compliance Officer reviews annually the operation of the IDR Procedures, including the complaints register, the number of complaints received, the type of activity complained of and the length and outcome of dealing with complaints.

3.5 Unresolved complaints

If DomaCom cannot resolve a complaint within 21 days, DomaCom will inform the complainant that they have been unable to resolve the dispute, and that the complainant may wish to start the mediation with the Trustee, MSC's email: complaints@msc.group

If your complaint is not resolved it will be forwarded to and dealt with by the Trustee.

3.6 Compliance with Australian Standard AS ISO 10002-2018

In accordance with Australian Standard AS ISO 10002-2018, DomaCom subscribes to the following essential elements of effective complaints handling:

- **Fairness** – DomaCom's IDR Procedures recognises the need to be fair to both the complainant. Fairness rests on three qualities—impartiality, confidentiality and transparency. DomaCom's has therefore implemented a system whereby the complaint can be properly identified and investigated by staff not involved in the subject matter of the complaint, i.e. a Complaints Officer.
- **Resources** – DomaCom has adequate resources for complaints handling given the size of the business.
- **Feasibility** – DomaCom's IDR Procedures will be well publicised to representatives and clients. The disclosure document, which all clients will receive, will contain information about the process for making a complaint.
- **Access** – DomaCom's IDR Procedures are accessible to all representatives. DomaCom's IDR Procedures are easy to understand and use and are drafted in plain language.
- **Assistance** – DomaCom will provide assistance to clients in relation to the formulation and lodgement of complaints.
- **Responsiveness** – DomaCom ensures that complaints will be dealt with quickly and the complainant shall be treated courteously.
- **Charges** – DomaCom does not charge any handling fee in relation to complaints made against it on an internal basis.
- **Remedies** – DomaCom IDR Procedures have the capacity to determine and implement remedies.

- **Data Collection** – DomaCom has an appropriate systematic recording of complaints and outcomes as it maintains a complaints register.
- **Systematic and Recurring Problems** – The Complaints Officer is responsible for any trend analysis with respect to complaints. In addition, the Compliance Manager reviews the complaints register annually.
- **Accountability** – The Complaints Register is available for inspection by ASIC if required.
- **Reviews** – DomaCom’s IDR Procedures are reviewed annually by the Compliance Manager to ensure that it is efficiently delivering effective outcomes.

3.7 What you should do if you have a Complaint

If you have a complaint or dispute relating to the financial services provided to you by DomaCom, you should contact DomaCom in the first instance.

If the complaint or dispute is not satisfactorily resolved by DomaCom, you should contact MSC immediately.

If the complaint or dispute is unable to be settled immediately to your satisfaction, your complaint or dispute will be acknowledged within 1 business day. DomaCom or MSC may request further details from you.

A final response will be provided within 21 days from acknowledging your complaint or dispute. If we are unable to resolve your complaint to your satisfaction after the 21 days, you may be eligible to escalate the complaint to the Australian Financial Conduct Authority (AFCA).

Both DomaCom and MSC are members of AFCA, which can be contacted by the following ways.

Website:	www.afca.org.au
Mail:	GPO Box 3, Melbourne VIC 3001
Phone:	1800 931 678

Note: AFCA will not consider complaints or disputes that have not first been brought forward to DomaCom or MSC. (see Annexure C - AFCA complaint resolution process)

Annexure A

RECORDING COMPLAINTS, IDENTIFYING & RECORDING SYSTEMIC ISSUES

We will record information in the following tabular form, this is held within our directory:

– Complaints\Internal Dispute Resolution

DOMACOM AUSTRALIA LIMITED - REGISTER OF COMPLAINTS FOR

Staff or Representative's name

Complaint number

Date Client name

Type of complaint (incl. value)

Handled by whom

Satisfactory outcome?

Date of advice to MSC Trustee (if not resolved within 5 business days)

Documents you might need

Different information and documents will normally be required for different types of complaints, but the general categories of documents and information following will be most helpful:

Evidence/supporting documents: This is the information, reports, assessments, photos, receipts, correspondence, bank and other financial statements that provide background to your complaint and that are likely to be relevant to the issues you have raised.

It is also important not to write notes directly onto complaint documents as it can make it difficult to interpret your comments and it also changes the primary evidence.

Claim details: This is the remedy, including any sum of money, or other outcome that you are seeking to resolve your complaint. Any relevant calculations of a claim for financial loss or compensation should be provided. You should also include documents, or references to documents that help us understand how you calculated your claim.

Timeline/chronology of events: This should clearly explain what happened and when. The more complex the complaint, the more important it is to have this information. It also helps everyone to understand the order of events that have happened in relation to your complaint.

Financial advice, stockbroking and managed investments

Financial plans or Statements of Advice

Prospectus or Product Disclosure Statements

Fact find/Needs analysis

Investment or account statements

Service agreements

Annexure B

Form for complainant

The following is a sample form containing the principal information which can aid a complainant to provide the key details required by the organization to handle the complaint effectively and efficiently.

1 Details of complainant

Name/organization _____
Address _____
Postcode, town _____
Country _____
Phone _____
Fax _____
Email _____

Details of person acting on behalf of complainant (if applicable)

Details of person to be contacted (if different from above)

2 Product description / service description

Reference number (if known or applicable) _____
Description _____

3 Problem encountered

Date of occurrence _____
Description _____

4 Remedy requested

Yes ☐ No ☐

5 Date, signature

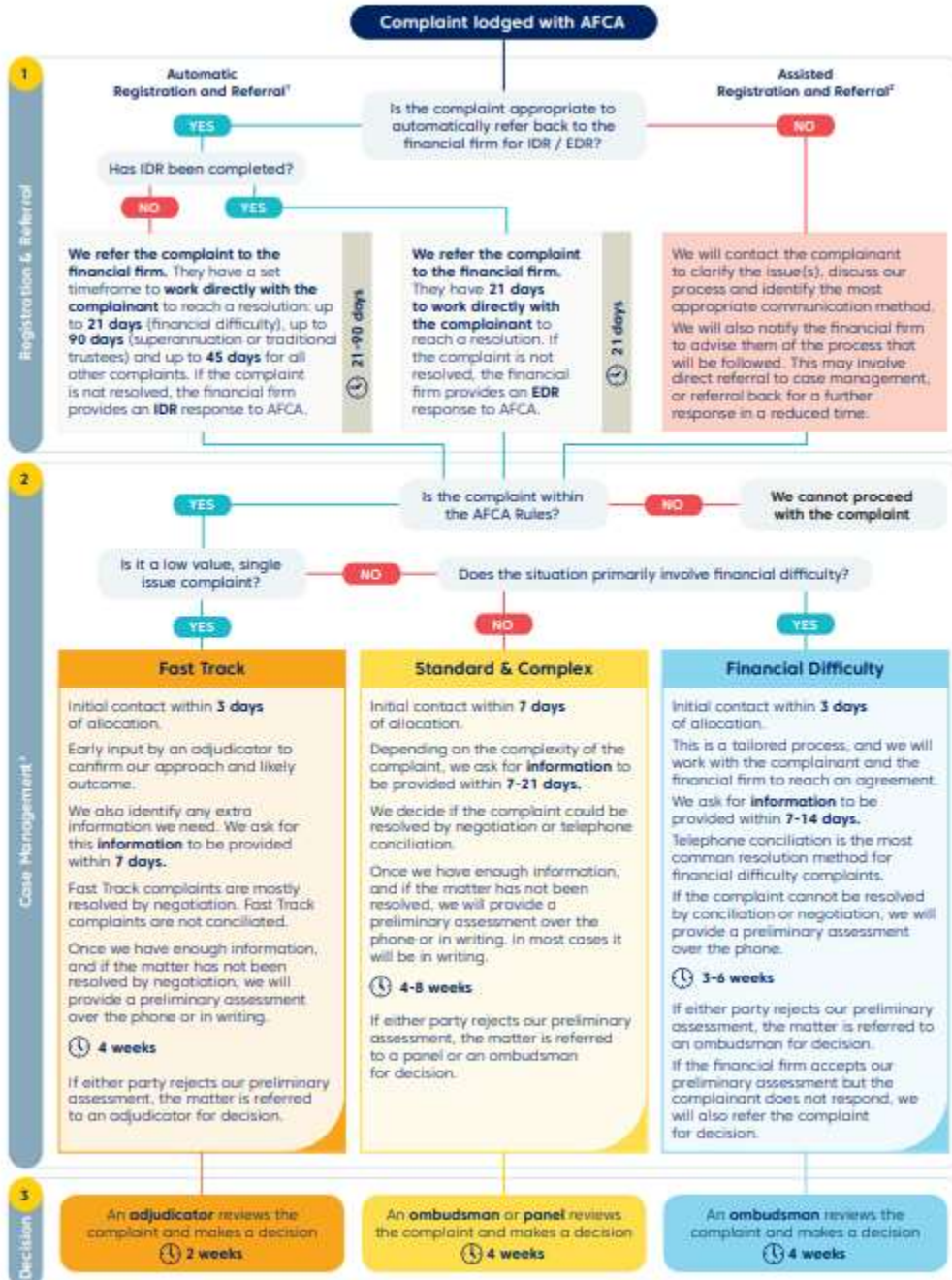
Date _____ Signature _____

6 Enclosure

List of enclosed documents

Annexure C

AFCA complaint resolution process



¹ Most complaints will progress through the automatic Registration and Referral process.

² Some complaints may not be appropriate to automatically refer back to the financial firm because of the subject matter, urgency or the accessibility needs of the complainant.

³ These are average expected timeframes.