



Australian Private Capital Advisory Services Pty Ltd (APC)
AFSL: 236776

COMPLAINTS HANDLING POLICY

Introduction

1. A complaint is “Any expression of dissatisfaction made to an organisation, related to its products or services, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected.”
2. This policy applies to complaints received from retail persons and small businesses in relation to services provided by the company.
3. Complaints include such matters as:
 - a) the subject of an existing remediation program or a complaint about the remediation program itself. Examples of these are delays in responding or lack of communication.
 - b) posts on a social media channel or account owned or controlled by a person that meets the definition of a complaint, where the author is both identifiable and contactable.

Collection of information

4. All complaints will be recorded in a Complaints Register with sufficient information that will allow anyone examining the record to understand the complaint and the steps taken to address it.

Resources

5. The Board has appointed a Complaints Manager, being a person occupying a senior management position in the company. The Complaints Manager will be able to call on other resources from time to time to facilitate the assessment and responding to complaints received.
6. The Complaints Manager is responsible for:
 - a) Implementation of this Policy.
 - b) Training employees about this Policy.
 - c) Monitoring and updating the Complaints Register.
 - d) Reporting to Board as to complaints received and their outcome.

Reporting to the Board

7. The Complaints Manager will provide regular reporting to the Board as to complaints received and the outcome of those complaints.

Assistance in lodging a complaint

8. If you require assistance in lodging a complaint you can send an email to enquiries@apcas.com.au or telephone 03 9621 1000 to speak with the Complaints Manager.

INTERNAL COMPLAINTS PROCEDURE

Receiving a Complaint

Where a complaint is received in writing

9. All written complaints are forwarded to the Complaints Manager.

10. The Complaints Manager reviews the content of the complaint. If further information is required you will be contacted.
11. Written complaints should be addressed to:

The Complaints Manager
Australian Private Capital Advisory Services Pty Ltd
Level 11, 379 Collins Street
Melbourne Vic 3000

Where a complaint is received other than in writing

12. A complaint may be made to us by telephone, email, letter, social media, in person or online. Ideally a complaint in writing will enable us to better understand the issue you are aggrieved about. However, where the complaint is not in writing, we will ask you to provide us with background material to enable us to better understand your complaint. This information we will collect will be recorded in writing as a file note and include the following:
 - a) Your name
 - b) Contact details
 - c) Details of the complaint and the outcome you are seeking.
13. Before ceasing our conversation, we will re-confirm all pertinent details and make a file note of our conversation.
14. Should we resolve the matter with you we will record that outcome in our file note. Our file note of conversation will be forwarded to the Complaints Manager.

Social Media sources

15. Posts on social media channel or an account owned by us that constitute a complaint and where the author is both identifiable and contactable will also be investigated by the Complaints Manager in accordance with the process below.

Process for assessment of complaints received

16. The following outlines the steps we take when we receive a complaint:
 - All complaints received are provided to the Complaints Manager, regardless of the source or if the matter was resolved with you at the time by a member of our staff.
 - The Complaints Manager will contact the complainant by telephone or in writing to inform the complainant that their complaint is being assessed. If there is any outstanding information, this will be requested.
 - Where we have your contact details and your concerns have not been resolved, we will send to you an acknowledgement letter or email within 1 (one) business day following receipt of the complaint. In that correspondence we may request additional information to assist us in considering your complaint. Alternatively, we may telephone you for that purpose.
 - The Complaints Manager will have responsibility for investigating the complaint. To do this the assistance of other persons within the company may be required and they can be involved in assessing the complaint received. Should the Complaints

Manager elect to do this, the Manager retains responsibility for ensuring the complaint is handled efficiently to respond with legislative timing obligations by which we respond to your complaint.

- We will endeavour to resolve complaints we receive within five business day of the complaint being received. This could be either by:
 - Resolving the matter to your satisfaction, or
 - To provide you with an explanation and / or apology when we can take no further action to reasonable address your complaint.

The Complaints Manager will send a letter of response back to you.

- If the resolution of the complaint is likely to be protracted, we will contact you when this is identified. You will be informed that investigations are continuing and may take a few weeks to resolve.
- Once a matter is resolved to your satisfaction, you will be contacted and informed of the outcome. Where a matter remains unresolved from 30 days of receipt of the complaint, you will be contacted and informed by the 30th day the complaint is unresolved. The information you will be informed of is discussed below.

Where we require further time to consider your complaint

17. Should we consider that a complaint will not be finalised within a 30 day of its receipt, the Complaints Manager will correspond with you and:
- a) inform you of the reason for the delay;
 - b) advise you of your right to complain to the Australian Financial Complaints Authority Limited (AFCA), and
 - c) provide you with information as to how to contact AFCA.

One reason for such a letter is that although we have attempted to contact you, you have been able to provide us with sufficient information to enable assessment of the complaint.

18. AFCA is an independent body that provides a free service for you to raise your complaint with them that they will assess once the obligation for us to assess the complaint has lapsed. The contact detail for the AFCA is GPO Box 3 Melbourne Vic 3001 or on 1800 931 678.

What happens if we reject or partially rejected a complaint?

19. Where either the complaint has been rejected or partially rejected, reasons will be provided in the letter to you in which we will:
- a) Identify and address the issues raised in the complaint;
 - b) set out the financial firm's findings on material questions of fact and referring to the information that supports those findings;
 - c) provide enough detail for you to understand the basis of the decision and to be fully informed when deciding whether to escalate the matter to AFCA, and
 - d) we will include the contact details of the AFCA along with information on how to progress the matter with the AFCA.

Charge for using our Complaints arrangements

20. There is no charge to you to access our Complaints Handling process.