

SGHiscock Complaints Handling Policy

1. Purpose

SGHiscock Investment Management (SGHiscock) has an obligation to develop and implement adequate arrangements for handling complaints so that enquiries, complaints and disputes are resolved in an efficient, timely, satisfactory and professional manner. As an Australian Financial Services Licensee, SGHiscock is subject to compliance and regulatory obligations under its operations as a financial services provider. SGHiscock promotes a culture that welcomes feedback, values complaints and fosters firm-wide accountability for complaint management.

This Policy has been developed in accordance with ASIC Regulatory Guide 271 Internal dispute resolution (September 2021).

2. Definition of a Complaint

In accordance with AS/ANZS 10002:2014, a complaint is "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."

This policy applies to complaints received from retail persons and small businesses in relation to services provided by SGHiscock and its subsidiaries.

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.

A complaint does not include either:

- a) Employment-related complaints raised by staff; or
- b) Matters where a response is not expected from the Group. Such matters would be:
 - Feedback provided in surveys; or
 - Reports intended solely to bring a matter to the Groups attention.

3. Complaints Handling Process

3.1 Acknowledging and receiving a complaint

We endeavour to ensure that any complaints received are managed fairly, objectively and without actual or perceived bias. When dealing with complaints, we will comply with our obligations under privacy laws.

A complaint may be made to us in writing (e.g. email, letter, social media or via our website) or verbally (e.g. by telephone or in person). We will acknowledge the complaint (for example via post, phone or email) within 1 (one) business day following receipt of the complaint or as soon as practicable.

Where a complaint is received in writing

All written complaints are to be forwarded to the Complaints Officer by:

Post:

The Complaints Officer

SG Hiscock & Company Limited, trading as SGHiscock Investment Management

Level 23, 360 Collins Street

Melbourne Victoria 3000

Or Email: enquiries@sghiscock.com.au

The Complaints Officer will review the content of the complaint and contact the complainant if further information is required.

Where a complaint is received other than in writing

Ideally a complaint in writing will enable us to better understand the issue a person is aggrieved about. However, where the complaint is not in writing, we will contact you to provide us with background material to enable us to better understand your complaint. The information you provide to us will be recorded in a file note and will include items such as:

1. Your name
2. Contact details
3. Details of the complaint and the outcome you are seeking.

If we collect this information via a telephone conversation or in person, before ceasing our conversation, we will re-confirm all pertinent details and make a file note of our conversation.

Should we resolve the matter with you we will record that outcome in our file note. Our file note of the conversation will be forwarded to the Complaints Officer.

Social Media sources

Posts on a social media channel or an account owned by or controlled by companies in the Group that meet the definition of a complaint, where the author is both identifiable and contactable will also be investigated by the Complaints Officer in accordance with the process below.

3.2 Process for assessment of complaints received

The following outlines the steps we take when we receive a complaint:

- All complaints received are provided to the Complaints Officer, regardless of the source or if the matter was resolved with you at the time.
- The Complaints Officer will contact the complainant by telephone or in writing to inform the complainant that your 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 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 officer will have responsibility for investigating the complaint. In this regard it may be forwarded to other persons within the Group. Should the Complaints Officer elect to do this, the Complaints Officer retains responsibility for ensuring the complaint is handled efficiently in accordance with the timeframes required by legislation.
- We will endeavour to resolve complaints we receive within 5 (five) business day of the complaint being received. This could be either by:
 - Resolving the matter to your satisfaction, or
 - Providing you with an explanation and / or apology when we can take no further action to reasonably address your complaint.

The Complaints Officer will send a letter of response back to you and update the Complaints Register regarding the outcome.

- 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 30 days after receipt of the complaint, you

will be contacted and informed by the 30th day that the complaint is unresolved and informed of the course of action available to you.

- If the matter is not resolved to your satisfaction, you are able to complain to the Australian Financial Complaints Authority Limited (AFCA).

3.3 Where we require further time to consider your complaint

Should we consider that a complaint will not be finalised within 30 days of its receipt, a letter signed by the Complaints Officer will be sent to you. We will:

1. Inform you of the reason for the delay;
2. Advise you of your right to complain to the Australian Financial Complaints Authority Limited (AFCA); and
3. 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 unable to provide us with sufficient information to enable assessment of the complaint.

The Australian Financial Complaints Authority Limited is an independent body that provides a free service. You may raise your complaint with them upon being informed of the above outcome.

Online: www.afca.org.au

Email: info@afca.org.au

Phone: 1800 931 678 (free call)

Mail: Australian Financial Complaints Authority, GPO Box 3, Melbourne, VIC 3001

3.4 What happens if we reject or partially reject a complaint

Where a complaint has either been rejected or partially rejected, reasons will be provided in a letter to you. In the letter we will:

1. Identify and address the issues raised in the complaint;
2. Set out our findings on material questions of fact, making reference to the information that supports those findings;
3. 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 the Australian Financial Complaints Authority Limited (AFCA);

4. We will include the contact details of the AFCA along with information on how to progress the matter with the AFCA.

4. Assistance in lodging a complaint

If you require assistance in lodging a complaint you can:

- send an email to enquiries@sghiscock.com.au; or
- telephone (03) 9612 4600 to speak with the Complaints Officer.

5. Collection of information

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

6. Resources

The SGHiscock Board has appointed a Complaints Officer, a senior management position in the Group. The Complaints Officer will be able to call on other resources from time to time to facilitate assessing and responding to complaints received.

The Complaints Officer is responsible for:

- a) Implementation of this Policy.
- b) Training employees about this Policy.
- c) Monitoring and updating the Complaints Register
- d) Reporting to the Board any complaints received and their outcome.

7. Reporting to the Board

The Complaints Officer will report regularly to the SGHiscock Board any complaints received and the outcome of those complaints.

8. Charge for using our Complaints arrangements

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

9. Review of Complaints Handling Policy

This policy is reviewed on an annual basis.