

EQT GROUP COMPLAINTS HANDLING POLICY



Equity Trustees

Policy Level: Level 1A

Policy Owner: Chief Risk Officer

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STATEMENT OF POLICY

OBLIGATION

Equity Trustees Holdings Limited (EQTHL) ABN 22607 797 615 and its Australian domiciled subsidiaries' ("EQT"), collectively referred to as the EQT Group and also referred to in this policy as "Equity Trustees", "we", "us" or "our" 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 across all EQT Group businesses.

EQT Group is subject to extensive compliance and regulatory obligations arising from its operations as a financial services provider, a licensed Trustee Company, Australian Financial Services Licensee, Australian Credit Licensee, Responsible Entity (RE), an ASX listed company (EQT Holdings Limited), and a Registrable Superannuation Entity (RSE) licensee. In addition, Equity Trustees Wealth Services Limited is the Trustee of various charities governed by the Australian Charities and Not-For-Profit Commission (ACNC).

PURPOSE

The purpose of the EQT Group Complaints Handling Policy (the Policy) is to establish a standard of practice to identify, evaluate, manage, monitor, escalate and report complaints (the Internal Dispute Resolution (IDR)) across the EQT Group's business and external service providers carrying out duties on behalf of the EQT Group. This Policy has been developed with consideration to the size and nature of the business including the products and services offered and nature of the customer base. The Policy also sets out the linkage between IDR and the External Dispute Resolution (EDR) process.

APPLICATION

All complaints relating to the EQT Group's products and services will be handled in accordance with the principles of this Policy. The Policy outlines the high-level process to be adopted in handling Complaints and core accountabilities for each component of the process. Detailed procedural documents support this policy.

This Policy also applies to external service providers carrying out duties on behalf of the EQT Group; examples of such providers include but are not limited to third party investment managers, custodians and administrators. Where a complaint arises, relates to or is being dealt with by the service provider, the EQT Group remains ultimately responsible for ensuring compliance with the legislative requirements of this Policy. This means at a minimum that EQT Group must have visibility and oversight of how complaints are being handled and that the contents of this Policy are complied with by relevant external service providers.

LEGISLATION

This Policy gives consideration to the legislative requirements for complaints handling that are applicable to the EQT Group, including but not limited to:

- ASIC Regulatory Guide 271–Internal dispute resolution
- ASIC Regulatory Guide 267 – oversight of the Australian Financial Complaints Authority
- AS/NZ ISO 10002: 2014–Guidelines for complaints handling in organisations
- Corporations Act (Cth) 2001
- Privacy Act 1988
- Superannuation (Resolution of Complaints) Act 1993
- ASIC Class Order 13/763

REVIEW

This Policy shall be reviewed every three years (or more frequently if required) to ensure that it remains appropriate and effective.

POLICY BREACHES

Breaches of the Policy may expose the EQT Group to compliance breaches, escalated client complaints or regulatory scrutiny, and may result in a breach of licence conditions or legislative requirements.



All complaints that may constitute a breach of this Policy should be escalated to Enterprise Risk, including the Group Privacy Officer where there has been a privacy breach.

REPORTING

Periodic reporting on complaints, and compliance with this policy will be provided to the Management, Audit, Risk and Compliance Committee (MARCC), and relevant Boards and Board Committees.



POLICY PRINCIPLES

GUIDING PRINCIPLES

The EQT Group recognises that managing complaints appropriately is integral to maintaining its reputation and allows it to promote the highest standard of service to customers. The EQT Group is committed to managing and resolving complaints by:

- Promptly, fairly and consistently dealing with complaints;
- Seeking to resolve complaints with customers through the IDR process as outlined in this policy;
- Endeavouring to resolve complaints in a timely manner and in line with regulatory timeframes;
- Providing visibility and ensuring accessibility to complainants;
- Being responsive to complaints and dealing with complaints objectively;
- Being sensitive and providing confidentiality;
- Ensuring that the process is customer focused;
- Conducting robust investigations and providing fair and reasoned determinations;
- Adopting a mindset of continuous improvement; and
- Empowering staff to prioritise decisions, seek early resolution and have appropriate authority to resolve complaints.

DEFINITION OF A COMPLAINT

EQT Group defines a complaint in accordance with regulatory standards i.e. AS/NZS ISO 10002-2014, as follows:

“An expression of dissatisfaction made to or about an organisation, related to its products or services, staff or the handling process of a complaint, where a response or resolution is explicitly or implicitly expected or legally required”.

Examples of an expression of dissatisfaction may include but are not limited to complaints about:

- An EQT Group product or the level of service provided;
- Posts on a social media channel or account owned or controlled by EQT Group, where we can identify and contact the author;
- Complaints in relation to existing remediations (e.g. lack of communication)
- Decisions that may affect entitlements relating to estate and trust matters which may also include objections to a proposed decision about how and to whom to pay a superannuation death benefit distribution;
- Any aspect of superannuation services including member benefits (where a member of the EQT Group is the RSE Trustee);
- Delays in receiving a payment of some kind;
- Financial advice and/or service provided;
- Fees charged for a product or service;
- Concerns about the handling of private and sensitive information
- disputes in relation to the credit activities engaged in by the licensee, or its credit representatives

In some cases, an expression of dissatisfaction will be explicit such as a written complaint setting out the specific concerns of the client coupled with a request for resolution. In other circumstances, the client's concerns may be implicit and made as part of an inquiry or verbal discussion over the telephone. The person raising the complaint does not have to expressly state the word “complaint” or



“dispute” or put their complaint in writing, to trigger EQT’s obligation to deal with the matter as per our IDR process.

ACCESS AND VISIBILITY

EQT Group ensures that its staff and customers are aware of its complaints management process. Information on the process is available free of charge on the EQT website, in Financial Services Guides (FSGs), Product Disclosure Statements (PDSs), periodic statements (including exit statements) and forms and notices issued under the National Credit Code.

EQT Group does not charge customers for accessing information on the EQT complaints process.

COMPLAINTS PROCESS

The following diagram depicts the steps in the EQT Group IDR complaints handling process, including accountability for actioning each step. The process applies to complaints received by EQT employees or external service providers.

Procedural documents in both Line 1 (Business Units (BU) and Line 2 (Enterprise Risk (ER)) provide detail of the specific complaints handling process.



1. Receive and Acknowledge

Complaints can be received verbally (e.g. by telephone or in person) or in writing (e.g. email, online (e.g. social media), facsimile or letter).

A complaint must be acknowledged by the relevant BU to the complainant (for example via post, phone or email) within 24 hours (or one business day) of receiving it, or as soon as practicable.

Traditional Trustee Services (TWS Business Unit): For complaints relating to these services EQT Group must use best endeavours to identify and notify other persons who may reasonably have an interest in the outcome of the complaint. Those that have been identified must also be kept informed of the progress including the IDR response or delay notification.

2. Record and Report

All complaints received must be recorded in the Risk & Compliance system which is the central complaints register used to monitor progress and outcomes in addressing the complaints through to



resolution, including management reporting. The information recorded in the register includes but is not limited to:

- The date the complaint was received
- The method of receipt (e.g. telephone, letter, email, social media)
- Customers name
- Complainant contact details
- Nature and cause of the complaint
- Business unit or external service provider where the complaint originated from
- Required action, remedies and resolution, including associated timeframes, and
- Final response and date sent.

In addition to the complaints register all information relating to the complaint is required to be retained in accordance with the EQT Group Record and Data Retention Policy.

The complaints register should be reviewed and analysed on a periodic basis to identify trends, potential compliance breaches and/or systemic issues. On at least a quarterly basis a complaints report will be provided to Executive Management and relevant Boards and Committees. The information to be reported should include but not limited to:

- Trends and ageing analysis
- Complaints referred to legal resources or external dispute resolution schemes and
- Level of adherence to the Policy.

External Service Providers

Where complaints handling and management is performed by external service providers EQT Group as the issuer and provider of the financial product or service remains responsible for ensuring external service providers comply with this Policy and the underlying regulatory obligations. These external service providers should be engaged and monitored in line with the EQT Group Outsourcing Framework.

3. Investigate and Escalate

Typically, complaints are based on a unique set of circumstances and will involve a subjective assessment. At a minimum the following should be considered:

- The nature and type of complaint
- The circumstances which have given rise to the complaint
- The relevant parties involved and
- The effect of the complaint.

Complaint investigation may include:

- the collection of information or written documents from relevant business units, or external service providers.
- discussions with relevant business units and/or service providers.

Complaints when initially received should be directed to the following roles as per the below table. In most cases persons in these roles will be able to access all complaints via the Risk & Compliance system (CAMMs).



	ALL COMPLAINTS	COMPLAINTS (EXTERNAL DISPUTE RESOLUTION)	PRIVACY COMPLAINTS	COMPLAINTS (LEGAL ACTION LIKELY OR THREATENED)
Executive General Mgr. of Business Unit		X		X
Business Unit Delegate with Responsibility for Complaints	X	X	X	X
Business Unit Compliance or Risk Specialist	X	X	X	X
Group Privacy Officer		X	X	X
Enterprise Risk (Compliance Team)	X	X	X	X

Note: Where a complaint may potentially result in media coverage, the General Manager, Marketing and Communications must also be informed.

Any media requests must only be dealt with as outlined in the EQT Media Policy.

4. Resolution and Response

Depending on the circumstances surrounding a complaint, the resolution may involve, one or more of the following:

- The correction of any errors made, with a view to restoring the customer to their correct position had the error not occurred including any financial recompense required;
- A refund or reduction of fees charged for products or services;
- A review of any decision made in the capacity of the Trustee or Executor;
- An apology to the customer for any shortfalls in service; and
- An explanation supporting a disputed decision made.

This is not an exhaustive list of remedies and the trustee will exercise its discretion when remediating any member for loss.

EQT Group will endeavour to resolve all complaints by applying the following principles:

- Communication and tone should be positive and constructive;
- Address all issues raised in the complaint; and
- Give clear and concise reasons for the decision reached.

In addition, all final response letter must include the following information:

- The final outcome of their complaint after following the IDR mechanisms
- The right to refer their complaint to AFCA if they are not satisfied with the IDR response
- The details for AFCA

Should EQT Group reject or partially reject the complaint, the response must include the following:

- Identify and address the issues raised in the complaint
- Respond to the Trustee's findings on material questions of fact, referring to the information that supports those findings; and
- Provide enough detail to understand the basis of the decision and to be fully informed to allow the complainant to decide whether to escalate the matter to AFCA or other EDR forum.



Note: The below **maximum** legislated timeframes apply to issuing a final response.

21 CALENDAR DAYS TO ISSUE FINAL RESPONSE	30 CALENDAR DAYS TO ISSUE FINAL RESPONSE	45 CALENDAR DAYS TO ISSUE FINAL RESPONSE	90 CALENDAR DAYS TO ISSUE FINAL RESPONSE
Credit related complaints	Privacy complaints	Superannuation	Superannuation Death Benefit Distributions
Credit Default Notices and requests to postpone enforcement proceedings (refer section below)	Managed Investment Scheme	Traditional Trustee Services	
	Investor Directed Portfolio Services		
	Financial Advice (general and personal)		

If the complaint is not able to be resolved in the above timeframes, either due to the complexity of the complaint or the circumstances which are causing the delay are beyond EQT's control, the EQT Group must inform the customer **before** the applicable timeframe of the following:

- Inform the complainant of the reasons for the delay;
- The right to take their complaint to AFCA if they are dissatisfied; and
- The contact details for AFCA.

Complaints Closed Within Five Days of Receipt

EQT is not required to provide an IDR response to a complainant if the complaint is closed by the end of the fifth business day after receipt if the following has occurred:

- a) resolved the complaint to the complainant's satisfaction and this has been confirmed (verbally or in writing) that they are satisfied with the response to the complaint and do not wish to take the matter further; and
- b) other circumstances exist that makes it reasonable for EQT to form the view that the complaint has been resolved to the complainant's satisfaction.

EQT must provide a written IDR response, even where the complaint has been closed by the end of the fifth business day, if:

- a) the complainant requests a written response; or
- b) the complaint is about:
 - i. hardship;
 - ii. a declined insurance claim;
 - iii. the value of an insurance claim;
 - iv. the decision of a superannuation trustee.

**NOTE:****Traditional Trustee Services (TWS Business Unit)**

- During the 45 calendar days given to provide a final response to the complaint, EQT must: on receiving the complaint, identify and notify other people who may request an information return (e.g. beneficiaries), and who may have an interest in the outcome of the complaint;
- consider their views;
- keep them informed of the progress of the complaint

The 45 day maximum timeframe for Traditional Trustee Services stops running when:

- Another person commences legal proceedings to be included as a beneficiary and the outcome would affect the handling of the complaint at IDR; or
- The trustee company applies for an opinion, advice or direction from a court to handle the complaint.

Time to address the complaint via IDR will recommence once the court makes a determination i.e. remaining available timeframe within 45 days to address is applicable e.g. court approached on day 5, then 40 days available to address the complaint post court determination will start to run again once the court (in either scenario) makes a determination.

Superannuation**Insurance Complaints**

Complaints about insurance can be lodged with either the insurer or Trustee. Arrangements must be in place to ensure the maximum IDR timeframe is complied with regardless of the initial lodgement point. Time starts to run from the date the complaint is first lodged with either one of the parties.

Objections to superannuation death benefit distributions

The Trustee, when seeking to distribute a death benefit, must send notice of the proposed benefit decision including written reasons to all potential beneficiaries, explaining that they may object to the proposal with 28 calendar days of receiving it.

Any objection to the proposed death benefit decision is a complaint and triggers the IDR process: If an objection is received, the 90-calendar day maximum timeframe begins from the end of the 28 day objection period.

After reviewing any objections, the Trustee may either:

- a) amend the previous proposed decision and provide all potential beneficiaries additional notice of any new decision (and further objections must be notified to the death benefit decision-maker within 28 calendar days); or
- b) amend or maintain the previous proposed decision and give all potential beneficiaries notice that they have made a decision, and eligible complainants can make a complaint to AFCA within 28 calendar days.

Should the Trustee give notice on a new proposed decision in response to an objection they must:

- a) provide each complainant with a response that meets the minimum IDR response requirements; and
- b) provide any non-complaining beneficiaries with the same information as the complainant, while complying with any obligations under privacy laws.



Corporate Trustee Services Australian Credit Licence

A modified regulatory regime applies to some unlicensed credit firms. Credit representatives and exempt special purpose funding entities (SPFEs) (including securitisation bodies) do not have IDR obligations, but must be a member of AFCA.

Credit representatives do not need to have IDR processes that meet the standards and requirements made or approved by ASIC. This is because a credit licensee's IDR process must cover disputes relating to its credit representatives. Most credit representatives are required to be separate members of AFCA: see s64 and 65 of the National Credit Act. However, a person who has been sub authorised under s65(1) of the National Credit Act and is an employee or director of the body corporate that gave the sub-authorisation does not need to be a separate member of AFCA.

Credit-related complaints involving hardship notices or requests to postpone enforcement proceedings.

Credit providers, credit service providers, lessors and unlicensed COI lenders must treat complaints involving hardship notices or requests to postpone enforcement proceedings as urgent matters

Where a complaint is about a hardship notice or request to postpone enforcement proceedings, the following maximum IDR timeframes apply: (a) the credit provider or lessor has 21 calendar days to consider and determine whether to agree to: (i) a change in the terms of the credit contract or lease for hardship (under s72 and 177B of the National Credit Code); or (ii) the request to postpone enforcement proceedings (under s94 and 179H of the National Credit Code)

If the credit provider or lessor does not have sufficient information about a hardship notice to make a decision, they must 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 credit provider or lessor has received the requested information, the credit provider has a further 21 calendar days to provide an IDR response.

If the credit provider or lessor does not receive the requested information within 21 calendar days of requesting the information, the credit provider or lessor has 7 calendar days to provide an IDR response.

If the complaint is not resolved within these timeframes, there will be no further time at IDR to deal with the complaint (unless RG 271.98 applies) and the complainant should be referred to AFCA.

if agreement is reached about a hardship notice or request to postpone enforcement proceedings, the credit provider or lessor has 30 calendar days to confirm the terms or conditions in writing.

Complaints involving default notices

A credit provider or lessor must give a borrower a 'default notice' before commencing enforcement proceedings to recover money, take possession of property or sell property: see s88 of the National Credit Code. The default notice must:

(a) inform the borrower or lessee that they must remedy the default within 30 calendar days

(b) substantially meet the pro forma notice requirements in Form 12A and Form 18A of the National Credit Regulations

If a complaint involves a default notice, the credit provider or lessor must provide an IDR response to the complainant within 21 calendar days.

Note:

An exemption applies for complaints about hardship notices or requests to postpone enforcement proceedings that the complainant has previously sought, and the provider or lessor has rejected or not considered. Given the urgency of these cases, the complainant may take their complaint directly to AFCA once the timeframes in the National Credit Code have passed.



Credit providers (including debt collectors), credit service providers, their credit representatives and unlicensed COI lenders must refrain from commencing or continuing with legal proceedings or any other enforcement action (i.e. debt collection activity) against the complainant. Unless the statute of limitations is about to expire, this applies: (a) while the complaint is being handled at IDR (during the 21 calendar days); and (b) for a reasonable time thereafter.

External Dispute Resolution

Information and Access to External Dispute Resolution (EDR) Schemes

If a complainant is not satisfied with EQT's response to their complaint, they can contact the Australian Financial Complaints Authority (AFCA).

AFCA is external to EQT. AFCA provides a free and independent dispute resolution service for individuals and small business customers who are unable to resolve their complaints directly with EQT.

Website: afca.org.au

Phone: +61 1800 931 678

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

For all other complaints including privacy related complaints

The following are other regulatory bodies that complainants may refer their complaint to:

1. Office of the Australian Information Commissioner (OAIC)
2. Australian Charities and Not for Profit Commission (ACNC)
3. Australian Communication and Media Authority (ACMA)
4. Australia Securities & Investment Commission (ASIC)

Often these regulatory bodies will request that complaints are first referred to EQT Group for resolution.

External Dispute Resolution (EDR) Schemes

EQT Group must maintain its membership with AFCA who is equipped to deal with complaints relating to the services and products provided by EQT.

EQT Group must notify ASIC no later than three business days after becoming aware that:

- It has failed to renew its membership of AFCA; or
- Membership was terminated because of failure to pay membership fees, non-compliance with Terms of Reference of a decision of that scheme.

5. Monitor and Oversight

It is important that oversight and monitoring activities are undertaken to ensure adherence to the Policy and ultimately to fulfil EQT Group regulatory obligations.

Where complaints handling and management is being undertaken by outsourced service providers EQT Group as the issuer and provider of the financial product or service remains responsible for ensuring compliance with this Policy and the underlying regulatory obligations. These outsourced service providers should be engaged and monitored in line with the EQT Group Outsourcing Framework.



ACCOUNTABILITIES

FIRST LINE – BUSINESS UNITS

Employees

- Record the complaint in Risk & Compliance system (CAMMs)
- Ensure that all records relating to the complaint are retained and uploaded into the Risk & Compliance system (CAMMs)
- Ensure an acknowledgement receipt of the complaint within 24 hours or as soon as practicable in writing
- Update the Complaints Register in the Risk & Compliance system (CAMMs) with progress of complaints
- Where external service providers are involved in the complaints management process, ensure oversight mechanisms exist to provide assurance that complaints are managed consistently with this Policy.
- Escalate any privacy complaints to the Group Privacy Officer
- Undertake training relating to complaints handling and processes

Executive Management

Executive Management are accountable for ensuring compliance with this Policy, this includes:

- Holding staff accountable for complaints handling and communicating the principles of this Policy to their staff i.e. making sure staff know what a complaint is, and how it should be managed, as outlined in this policy and related procedures
- Allocating appropriate and adequate resources to support the requirements of the Policy
- Overseeing the development of associated business unit procedures, protocols or processes that align to the Policy
- Assignment of responsibilities to applicable staff and reflecting these in position descriptions and delegations.
- Escalating to the Managing Director of significant complaints for consideration and escalation to the Management, Audit, Risk & Compliance Committee or Board.

SECOND LINE – ENTERPRISE RISK

- Establish and maintain a central complaint register that captures all relevant information to ensure application of the Policy.
- Assist BU privacy officers to address privacy complaints.
- Perform a periodic (monthly) review and analysis of the central complaints register.
- Provide periodic reporting (usually quarterly) on complaints to Boards and Committees. The oversight and monitoring of the application of this Policy and compliance with relevant regulatory obligations.
- Providing effective challenge and oversight of the relevant business units monitoring processes and procedures in relation to complaints handling.
- Maintain a Central Group complaints register.

RELATIONSHIP MANAGERS OF SERVICE PROVIDERS

Relationship Managers are responsible for ensuring complaints received by external service providers are managed in accordance with the requirements of this Policy. In addition, relationship managers must ensure that the external service provider is advised of this Policy.



SERVICE PROVIDERS

All outsourced service providers who undertake complaints handling on behalf of the trustee must comply with the requirements of the law and this policy. The Trustee should ensure that such arrangements are contractual in nature and that an oversight process is in place to manage compliance with this.

Where an external service provider has been engaged to undertake complaints handling management, they must ensure the following:

- Advise EQT of all complaints;
- If BU staff request information regarding a complaint it must be provided; and
- Alert the BU Staff if regulatory timeframes are not going to be met and the complaint may be referred to an EDR scheme.

IF HELP IS NEEDED IN MAKING A COMPLAINT

If a complainant wishes to, they may appoint someone else to manage their complaint on their behalf, for example, a friend or family member, a legal representative or financial counsellor. We will talk to the representative if we are authorised to do so.

We can arrange an interpreter (including an AUSLAN interpreter) to assist them in lodging and managing the complaint. If requested we will assist the complainant including any specific needs, to lodge their complaint.

You can contact Enterprise Risk – Compliance Team if you require more information in relation to the Complaints Handling policy/process.

COMPLAINT MONITORING

Complaint analysis is undertaken by both business units and ER.

Data analysis of the information entered into CAMMS helps to identify and implement improved practices

- Complaint numbers per BU.
- Times taken to resolve complaints.
- The ability to determine how long a complaint has been open and whether or not the complaint was resolved within the designated timeframe for the line of business it relates to.

and ER reports this to various committees and Boards:

Trends in complaints data can lead to underlying issues that could be addressed prior to them becoming a systemic issue for the business.

TRAINING

A requirement of EQT is that all staff attend mandatory training provided by ER and are to familiarise themselves with the IDR process. Ongoing ER will provide all staff annually with refresher training.

Further training will be provided for those staff who are responsible for responding and resolving complaints especially in relation to challenging complaints, to ensure:

Act with sensitivity and be both impartial and objective; and

Have the authority to act and provide appropriate compensation when required.

Business unit specific procedures must ensure that training requirements cover our credit representatives and outsourced providers.



GLOSSARY

APRA	Australian Prudential Regulation Authority
ASIC	Australian Securities Investment Commission
AFCA	Australian Financial Complaints Authority
AFSL	Australian Financial Services Licence
BU	Business Unit
Client	<p>A client includes:</p> <ul style="list-style-type: none">• A retail consumer investor of an investment scheme of which we are the Responsible Entity Trustee• A member of an RSE fund of which ETSL or HTFS is the Trustee• A client who receives financial advice from a member of the EQT Group• A beneficiary or co-trustee of a trust for which EQT Group is Trustee• A beneficiary or co-executor of an estate for which ETWSL is an executor• Key parties to an execution of a will prepared by ETWSL e.g. Testator, Executor, Trustee, Legal guardian• A retail consumer of a credit product of which we are the product issuer (ACL Licence)
Document Owner	An EQT Group staff member who is accountable for the production of regulated communications such as Product Disclosure Statements or Financial Service Guides
EQT Group Board(s)	The Board of Directors of any of the EQT Group companies
EQT Group	Equity Trustees Holdings Limited (EQTHL) ABN 22607 797 615 and its Australian domiciled subsidiaries' ("EQT"), collectively referred to as the EQT Group
Enterprise Risk	The EQT Group legal, governance, risk & regulatory compliance support team which reports to the Chief Risk Officer
EQTL	Equity Trustees Limited



ETSL	Equity Trustees Superannuation Limited
ETWSL	Equity Trustees Wealth Services Limited
EQRE	EQT Responsible Entity Services Limited
HTFS	HTFS Nominees Pty Ltd
Member	A member of an RSE Fund.
RE	Responsible Entity
RSE Licensee	ETSL & HTFS have been granted a licence by APRA to act as trustees of RSE Funds.
Traditional Trustee Services	Includes Will & Estates, Trusts and Philanthropy



POLICY ADMINISTRATION

Document Title	EQT Group Complaints Handling Policy
Policy Level	Level 1A
Version No.	V.5 / 2021
Policy Owner	Chief Risk Officer
Policy Administrator	Enterprise Risk
Related Policies <i>(These must be read in conjunction with policy)</i>	Code of Conduct & Ethics Record and Data Retention Policy Outsourcing Policy Privacy Policy Risk Management Framework
Supporting procedures or guidelines <i>(These must be read in conjunction with policy)</i>	ASIC Regulatory Guide 267 –Oversight of the Australian Financial Complaints Authority ASIC Regulatory Guide –271 Internal dispute resolution AS/NZS ISO 10002: 2014 (Guidelines for complaints handling in organisations.
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Regulator (if applicable)	ASIC, APRA
Review and Approval Body	MARCC EQTL, ETWSL, ETSL, HTFS and EQRE Boards



DOCUMENT VERSION CONTROL HISTORY

VERSION NO.	UPDATED/PREPARED BY	DATE	APPROVED BY
V.2/2018	Clare Doolan - Enterprise Risk	23/08/2018	MARCC EQTL, ETWSL, ETSL and EQRE Boards
V.3/2021	Clare Doolan – Enterprise Risk	21/7/2021	MARCC (Endorsed)
V.6/2021	Clare Doolan – Enterprise Risk Including changes recommended by Board Members	17/8/2021	EQTL, ETWSL and EQTRE Boards