

Insignia Group Complaints Policy

Public Policy
31/03/2022

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1. Overview

1.1. Introduction

The Policy has been developed to ensure that each complaint is addressed in a consistent, fair and reasonable manner when you express your dissatisfaction.

Managing and resolving client complaints add value to the way we operate, as it allows us to:

- improve business systems and processes, products and services, all of which are integral to delivering what matters to our clients;
- identify a potential breakdown in process, an issue, incident, breach of legislation; and
- reduce the risk of systemic issues.

This document sets out our policy for dealing with complaints received from clients and other people eligible to complain as outlined in Australian Securities and Investments Commission's (ASIC) Regulatory Guide 271 (RG 271).

1.2. Scope and application

This Policy applies to Insignia Financial Ltd (IFL) and its subsidiaries and related bodies corporate, which comprise APRA Regulated Entities (AREs), Responsible Entities (REs), Australian Financial Services (AFS) Licensees (collectively referred to as 'IFL' or 'Insignia' in this Policy). Where an entity specifically adopts this Policy (for example an ASIC or APRA-regulated entity) references to IFL or Insignia are taken to be a reference to that entity.

All employees, including casual, temporary, and contracted employees as well as executives and non-executive directors, any independent board committee members that are not directors and any third parties acting on behalf of the group (collectively referred to as 'our people' in this Policy) must comply with this Policy.

[Note to reviewers: this section has been amended to adopt Group template approach]

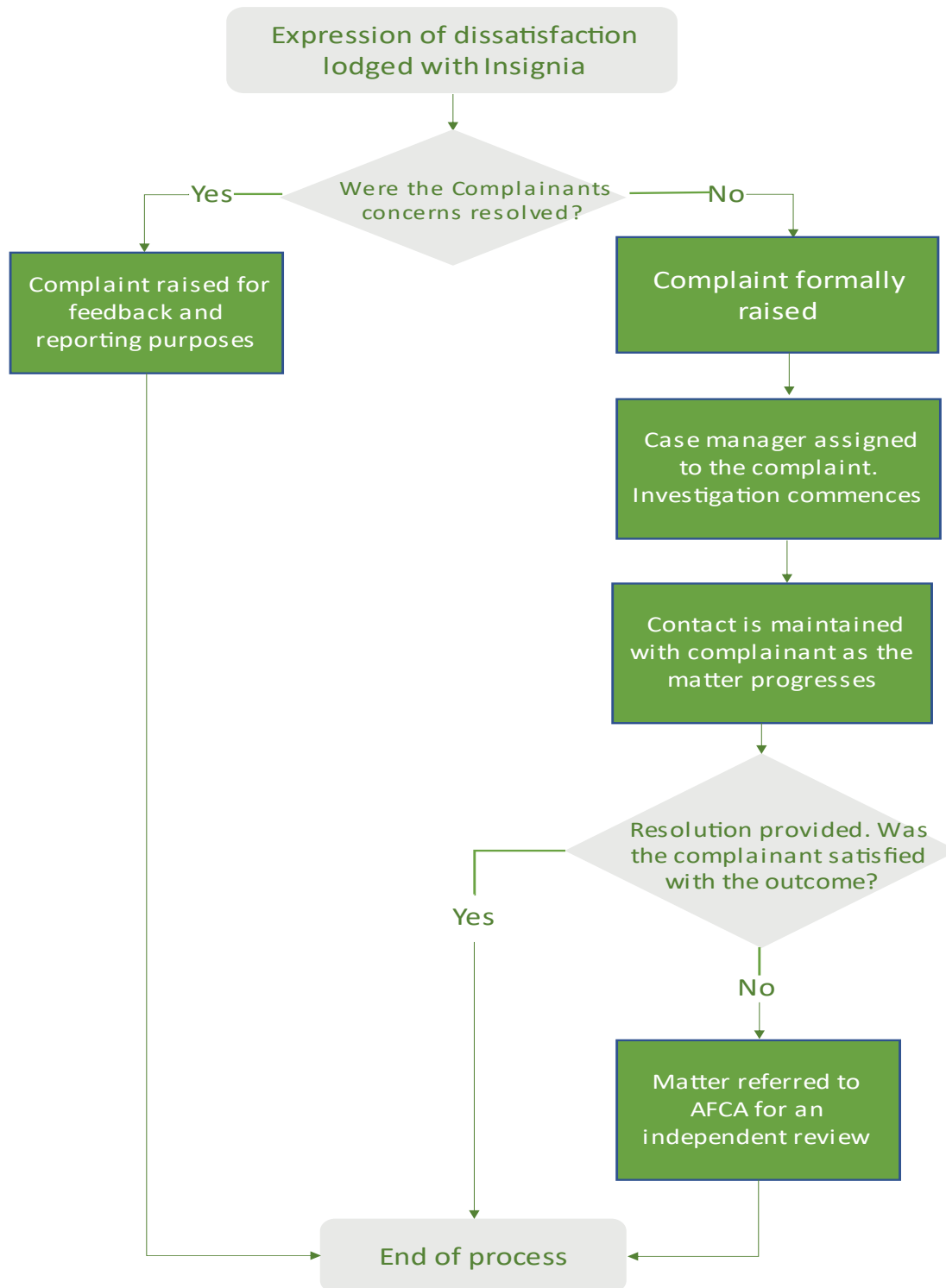
2. What is a complaint?

In accordance with RG 271 and Australian/New Zealand Standard ISO 10002-2014, a complaint is defined as:

An expression of dissatisfaction:

- made to, or about, Insignia;
- related to Insignia's products, services, staff or the handling of a complaint; and
- where a response or resolution is explicitly or implicitly expected or legally required.

3. The complaint process



4. Complaints handling principles

To achieve a positive client experience, we ensure that the business model for complaint resolution is optimised to uphold the following principles:

- We are visible and accessible to you and complaints can be lodged easily via multiple channels.
- We will provide a complaint resolution process which is free of charge.
- We aim to resolve complaints immediately at the initial contact when you express your dissatisfaction.
- All complaints are captured consistently, even where they are resolved at the initial contact with us. This helps us improve our systems, processes, products and services.
- We listen to you and take steps to resolve as quickly as possible.
- We seek to resolve the matter to your satisfaction where possible. If we can't agree on a solution, we will clearly explain our position and provide escalation avenues.
- Responsibility for complaints is given to staff not involved in the subject matter to maintain independence and fairness of the complaint investigation and resolution.
- Our communication style is simple and easy to understand; we utilise multiple channels.
- Complaints trends are reported transparently and regularly to the Executive Team, Insignia Boards and relevant Committees to ensure organisation-wide visibility.
- Complaints lodged with an external dispute resolution (EDR) body (such as the Australian Financial Complaints Authority) are managed separately to the internal dispute resolution (IDR) process which allows for an independent review of the IDR outcome.

5. Who can make a complaint?

Complaints can be received from clients, their authorised representatives, and various other stakeholders.

We will not exclude complaints received from third parties and we will accept complaints from complainants as defined in RG 271 (as a minimum).

These may include (and are not limited to):

- an existing account holder
- a past account holder
- a client's nominated financial adviser or authorised representative
- a trust beneficiary
- a superannuation member's employer
- an executor of an estate
- a legal representative
- an authorised third party
- a superannuation fund beneficiary
- a trustee of a self-managed superannuation fund

If you would like further details about who can make a complaint, please contact us.

6. Making a complaint

Complaints can be made online, by phone, email or in writing.

Product	Phone - weekdays 8.30am to 6.30pm (AEST)	Email	Website	Writing
ANZ Smart Choice Super and Pension	13 12 87 (or +61 2 9234 6112 from overseas)	superfeedback@ioof.com.au	https://onepathsuperinvest.com.au/about-us/feedback	Complaints Team GPO Box 5306 Sydney NSW 2001
ANZ Superannuation and Investment e.g; ANZ Super Advantage, ANZ OneAnswer Super, Pension & Investments	13 38 63 (or +61 2 4224 1299 from overseas)			
OnePath superannuation and Investments e.g; OneAnswer OneAnswer Frontier Super, Pension and Investments & Integra Super	133 665 (or +61 2 4224 1335 from overseas)			
Oasis Wrap e.g; Voyage, Mentor, Matrix, Wealthtrac & Dominion	1800 893 141 (or +61 2 8245 4493 from overseas)	service@wrapinvest.com.au	http://www.oasisasset.com.au/Contactus	Oasis Wrap GPO Box 3154 Sydney NSW 2001
IOOF e.g; IOOF Employer Super, IOOF Pension, IOOF Personal Super, IOOF Essential Super, eXpand Super, IOOF Essential pension, eXpand Pension	1800 913 118 (or +61 3 8614 4967 from overseas)	clientfirst@ioof.com.au	https://www.ioof.com.au/contact-us	IOOF Client First GPO Box 264 Melbourne VIC 3001
Advice Complaints (Refer to section 11 for AFSL list)	1800 271 147	advicecomplaints@ioof.com.au	https://www.ioof.com.au/contact-us	IOOF Advice Complaints Level 3/30 Hickson Rd, Millers Point NSW 2000
Australian Executor Trustees	1800 254 180	aetclientservices@aetlimited.com.au	https://www.aetlimited.com.au/contact-us#complaint	Customer Care AET, GPO Box 546, Adelaide SA 5001

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Privacy Complaints	1800 913 118	Privacy.Officer@ioof.com.au	https://www.ioof.com.au/contact-us	Privacy Officer IOOF GPO Box 264 Melbourne VIC 3001
Insignia Shareholders	Phone: 1300 552 203 (Australia only)	Insignia@boardroomlimited.com.au	http://www.boardroomlimited.com.au	Boardroom Pty Limited Level 12, Grosvenor Place 225 George Street Sydney NSW 2000
MLC MasterKey MasterKeySuper Pension Fundamentals; MasterKey Business and Personal Super; MasterKey Term Allocated Pension; MasterKey Investment Service Fundamentals; MasterKeyInvestment Service	132 652 (Outside Australia +61 3 8634 4721)	complaints@mlc.com.au	mlc.com.au/complaint	GPO Box 4341, Melbourne, Vic, 3001
MLC Navigator/Wrap Superannuation and Investment e.g. MLC Navigator/Wrap Superannuation Plan; MLC Navigator/Wrap Retirement Plan; MLC Navigator/Wrap Investment Plan; MLC Separately Managed Account	132 652 (Outside Australia +61 3 8634 4721)	complaints@mlc.com.au	mlc.com.au/complaint	GPO Box 4341, Melbourne, Vic, 3001
Plum Plum Corporate Super (including DB and Account Based Pensions); Plum Personal Plan (retained); Plum Retirement Income; Plum Insurance Only	1300 55 7586 (Outside Australia +61 3 9222 4800)	complaints@mlc.com.au	plum.com.au/complaints	GPO Box 4341, Melbourne, Vic, 3001

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Blueprint Superannuation and Investment Plan	1300 852 933	complaints@investinfo.com.au	investinfo.com.au/blueprint	GPO Box 4341, Melbourne, Vic, 3001
DPM Superannuation and Investment Plan	1300 367 236	complaints@investinfo.com.au	investinfo.com.au/dpm	GPO Box 4341, Melbourne, Vic, 3001
Enevia Superannuation and Investment Plan	1300 852 966	complaints@investinfo.com.au	investinfo.com.au/enevia	GPO Box 4341, Melbourne, Vic, 3001
FC One Superannuation and Investment Plan	1300 853 244	complaints@investinfo.com.au	investinfo.com.au/fc-one	GPO Box 4341, Melbourne, Vic, 3001
PremiumChoice Superannuation and Investment Plan	1300 880 054	complaints@investinfo.com.au	investinfo.com.au/premiumchoice	GPO Box 4341, Melbourne, Vic, 3001
Portfoliofocus Superannuation and Investment Plan	1300 769 613	complaints@investinfo.com.au	investinfo.com.au/portfoliofocus	GPO Box 4341, Melbourne, Vic, 3001
St Andrew's Superannuation and Investment Plan	1300 769 815	complaints@investinfo.com.au	investinfo.com.au/standrews	GPO Box 4341, Melbourne, Vic, 3001
Investment Manager (Antares Equities)	Weekdays 8.30am to 5.30pm (AEST) 1300 738 355	client.services@mlcam.com.au	mlcam.com.au/terms-and-conditions	Level 5, 105 Miller Street, North Sydney NSW 2060, Australia
Investment Manager (MLC Private Equity, Antares Fixed Income)	Weekdays 8.30am to 5.30pm (AEST) 1300 738 355	client.services@mlcam.com.au	mlcam.com.au/terms-and-conditions	Level 5, 105 Miller Street, North Sydney NSW 2060, Australia

Please note, insurance claim related complaints in respect of each product above should also be directed to the above contact points.

Complaints made on a social media channel or account owned or controlled by the financial firm that is the subject of the post, where the author is both identifiable and contactable will follow the IDR process. When lodging a complaint, providing the following information assists us in responding and investigating your complaint in a timely manner:

- Your name (you may remain anonymous or use a pseudonym, please see section 6.2).
- Your preferred contact details and method of contact (phone, email etc); and
- Details of the complaint or issue including:
 - the service or product;
 - your account number or client reference, if applicable;
 - the nature of your concern;
 - any information you believe would assist us to understand and investigate your complaint further; and

- details of the outcome you are looking to achieve or how best we can address your feedback.

To protect your privacy, when making a complaint via social media please ensure your personal information is provided in a secure manner such as a private message not via a public post.

6.1. Assistance to make a complaint

We work with a number of support services to enable clients with disabilities or vulnerabilities to raise their concerns.

- **If you do not speak English** and you wish to make a complaint;
 - We can arrange an interpreter to assist you in lodging and managing your complaint, subject to availability.
 - If an interpreter is not available, you can phone the Translating and Interpreting Service on 13 14 50 for help with your call.
- **If you are deaf**, or have a **hearing or speech impairment**, please phone us through the National Relay Service (NRS) on the numbers listed below:
 - TTY users, phone 13 36 77 and ask for the phone number you need (if you are calling from overseas phone +61 7 3815 7799); and
 - Speak and Listen (speech-to-speech relay) users, phone 1300 555 727 and ask for the phone number you need (if you are calling from overseas phone +61 7 3815 8000).
- **Internet relay users**, connect to the NRS on www.relayservice.com.au and ask for the phone number you need.

If you would like further information about the National Relay Service, phone 1800 555 660 or email helpdesk@relayservice.com.au

6.2. Complaints made anonymously

If you make a complaint anonymously or use a pseudonym and do not provide us with enough information to identify you and/or contact you, we may not be able to apply all of our complaints handling processes.

7. How we handle complaints

We value all complaints and aim to respond to you promptly. We recognise some complaints are particularly urgent and we assess and prioritise complaints according to the urgency and severity of the issues raised. When dealing with complaints, staff must ensure that the principle of fairness underpins the investigation and outcome of the complaint.

Fairness ensures that you have the right to:

- be heard;

- know whether we have complied with legal and regulatory requirements;
- provide and request all relevant material to support the complaint;
- be informed about the Insignia Group Complaints policy and the criteria that will be taken into consideration by us in dealing with the complaint;
- be informed about other avenues for further review including referral to the relevant EDR schemes (refer to section 9) of which we are a member;
- be provided with a response to the complaint including our decision and reasons for that decision;
- know that the complaint is being reviewed independently within Insignia (where this is possible); and
- confidentiality, if requested or considered appropriate.

7.1. Acknowledging a complaint

The recipient of a complaint will acknowledge within 24 hours (or one business day) of receiving it, or as soon as practicable. We will acknowledge a complaint verbally or in writing (email, post or social media channels). When determining the appropriate method of communication, we will consider the method used to lodge the complaint and any preferences expressed about communication methods.

7.2. Considering your complaint

With any complaint, we will consider what is fair and reasonable in the circumstances, as well as our obligations under the law and industry codes of practice. Where possible, we will aim to resolve your complaint at the time you raise it with us.

If you refer your complaint to us, we will work with you to resolve your complaint within the maximum timeframe prescribed by ASIC RG 271 below:

Type of complaint	Maximum timeframe for resolution *Post 5 October 2021
Superannuation complaints	45 calendar days
Non-Superannuation complaints e.g. Investment Products	30 calendar days
Privacy complaints	30 calendar days

Superannuation death benefit distribution complaints	No later than 90 calendar days after the expiry of the 28-calendar day period for objecting to a proposed death benefit distribution referred to in s1056(2)(a) of the Corporations Act.
Advice and stockbroking complaints	30 calendar days
Credit-related complaints involving default notices	21 calendar days
Credit-related complaints involving hardship notices or requests to postpone enforcement proceedings	No later than 21 calendar days after receiving the complaint. Exceptions apply if the credit provider or lessor does not have sufficient information to make a decision, or if they reach an agreement with the complainant

If we realise that we will need more than the maximum timeframe to investigate and resolve a complaint, we will write to you before that time has expired and explain why more time is needed. The written response will include the status of the complaint, the reasons for the delay, the way to escalate your complaint to an EDR scheme, and the name and contact details of the relevant EDR scheme.

7.3. Responding to your complaint

We will work with you to explore options for resolving your complaint. If we cannot resolve the complaint with you, we will provide the reasons for the decision we make, including providing supporting information where applicable.

We will provide a response to you in writing if we take more than 5 business days to resolve your complaint.

We will also provide a written response, even where the complaint is closed by the end of the fifth business day, if:

- you request a written response; or
- your complaint is about:
 - hardship;
 - a declined insurance claim;
 - the value of an insurance claim; or
 - a decision of a superannuation trustee.

8. Your options for review

If your complaint relates to a financial service or product, you may be able to request a free and impartial review by Australian Financial Complaints Authority (AFCA). AFCA offers a fair,

independent, and accessible dispute resolution for consumers who are unable to resolve complaints directly with their financial services provider.

You may have the option to lodge a complaint with AFCA directly rather than lodging a complaint with us, you are also able to lodge a complaint with AFCA if you are not satisfied with our response or if your complaint has not been resolved within the maximum timeframe prescribed by RG271 (refer to section 7.2).

Please note

Time limits may apply to raising complaints with AFCA, so you should act promptly or otherwise consult the AFCA website to find out if or when the time limit relevant to your circumstances expires.

You can contact AFCA at:

Website: afca.org.au	Postal Address:
Email: info@afca.org.au	Australian Financial Complaints Authority
Phone: 1800 931 678 (free call)	GPO Box 3
	Melbourne, VIC, 3001

If your complaint relates to a privacy matter and you are not satisfied with our response or if your complaint has not been resolved within 30 days, you can contact the Office of the Australian Information Commissioner (OAIC) at:

Website: oaic.gov.au	Postal address:
Email: enquiries@oaic.gov.au	Office of the Australian Information Commissioner
Phone: 1300 363 992	GPO Box 5218
	Sydney NSW 2001

9. Document information

Title	Policy name in full																																																	
Owner	Head of Complaints																																																	
Approved by	<table border="1"> <thead> <tr> <th>Board</th> <th>Approved</th> </tr> </thead> <tbody> <tr><td>Actuate Alliance Services Pty Ltd</td><td>20-Jun-22</td></tr> <tr><td>Antares Capital Partners Limited</td><td>27-May-22</td></tr> <tr><td>Australian Executor Trustees Limited</td><td>23-Jun-22</td></tr> <tr><td>Bridges Financial Services Pty Ltd</td><td>21-Jul-22</td></tr> <tr><td>Consultum Financial Advisers Pty Ltd</td><td>21-Jul-22</td></tr> <tr><td>Financial Services Partners Pty Ltd</td><td>21-Jul-22</td></tr> <tr><td>Godfrey Pembroke Group Pty Ltd.</td><td>21-Jul-22</td></tr> <tr><td>IOOF Investment Management Limited</td><td>07-Jun-22</td></tr> <tr><td>IOOF Investment Services Limited</td><td>27-Jun-22</td></tr> <tr><td>IOOF Limited</td><td>07-Jun-22</td></tr> <tr><td>Lonsdale Financial Group Ltd</td><td>21-Jul-22</td></tr> <tr><td>Millennium3 Financial Services Pty Ltd</td><td>21-Jul-22</td></tr> <tr><td>MLC Asset Management Pty Ltd</td><td>27-May-22</td></tr> <tr><td>MLC Asset Management Services Limited</td><td>27-May-22</td></tr> <tr><td>MLC Investments Limited</td><td>27-May-22</td></tr> <tr><td>Navigator Australia Limited</td><td>27-May-22</td></tr> <tr><td>NULIS Nominees (Australia) Limited</td><td>07-Jun-22</td></tr> <tr><td>Oasis Fund Management Limited</td><td>07-Jun-22</td></tr> <tr><td>OnePath Custodians Pty Limited</td><td>07-Jun-22</td></tr> <tr><td>OnePath Funds Management Limited</td><td>06-Jun-22</td></tr> <tr><td>RI Advice group Pty Ltd</td><td>21-Jul-22</td></tr> <tr><td>Shadforth Financial Group Limited</td><td>21-Jul-22</td></tr> <tr><td>Oasis Asset Management Ltd</td><td>08-Jun-22</td></tr> </tbody> </table>		Board	Approved	Actuate Alliance Services Pty Ltd	20-Jun-22	Antares Capital Partners Limited	27-May-22	Australian Executor Trustees Limited	23-Jun-22	Bridges Financial Services Pty Ltd	21-Jul-22	Consultum Financial Advisers Pty Ltd	21-Jul-22	Financial Services Partners Pty Ltd	21-Jul-22	Godfrey Pembroke Group Pty Ltd.	21-Jul-22	IOOF Investment Management Limited	07-Jun-22	IOOF Investment Services Limited	27-Jun-22	IOOF Limited	07-Jun-22	Lonsdale Financial Group Ltd	21-Jul-22	Millennium3 Financial Services Pty Ltd	21-Jul-22	MLC Asset Management Pty Ltd	27-May-22	MLC Asset Management Services Limited	27-May-22	MLC Investments Limited	27-May-22	Navigator Australia Limited	27-May-22	NULIS Nominees (Australia) Limited	07-Jun-22	Oasis Fund Management Limited	07-Jun-22	OnePath Custodians Pty Limited	07-Jun-22	OnePath Funds Management Limited	06-Jun-22	RI Advice group Pty Ltd	21-Jul-22	Shadforth Financial Group Limited	21-Jul-22	Oasis Asset Management Ltd	08-Jun-22
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