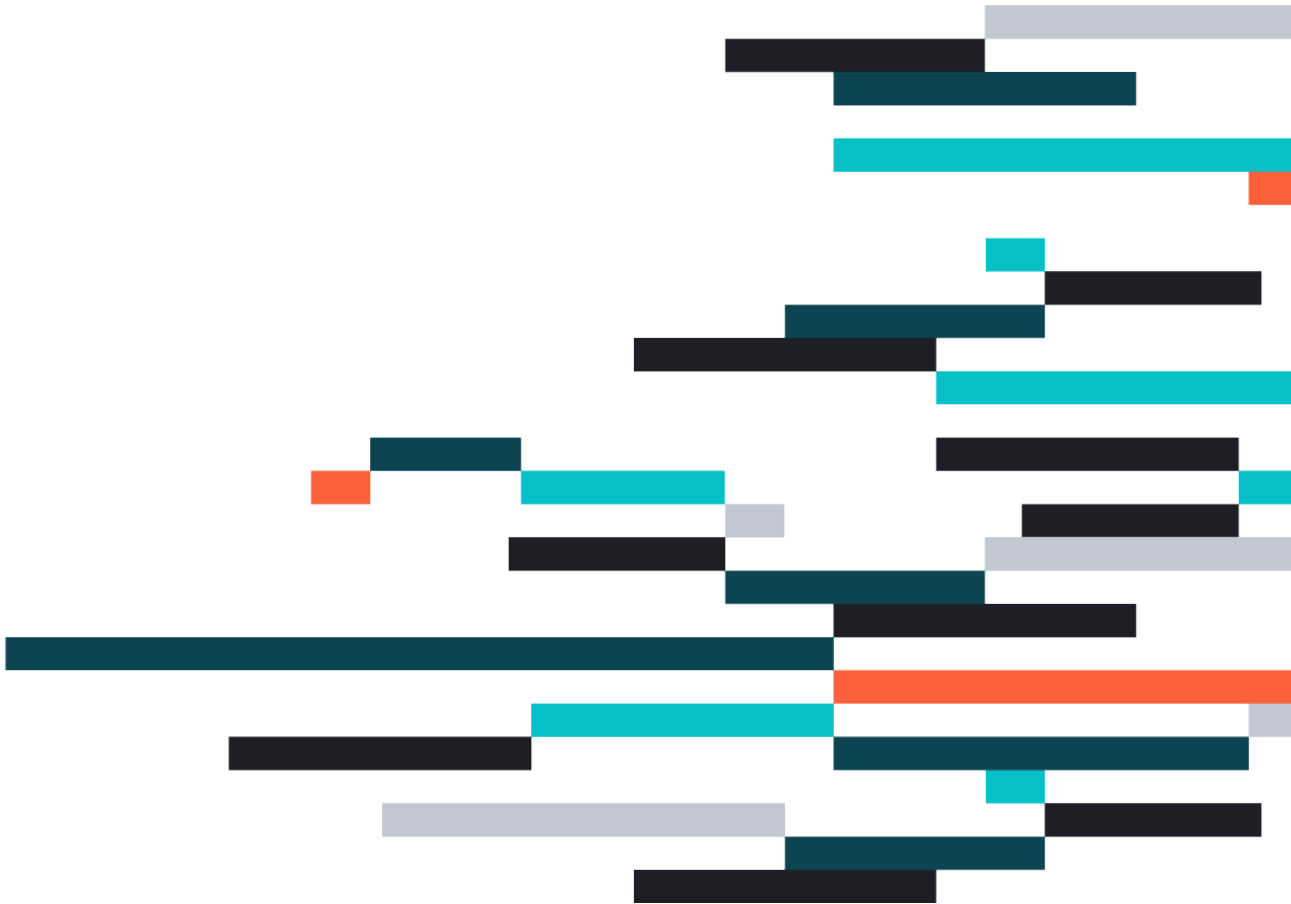




# Complaints Handling Policy

*Client Information*



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## Purpose

This policy applies to Certane Corporate Trust Pty Ltd AFS and AC Licence No. 258829 and Tidswell Financial Services Ltd AFS Licence No: 237628 (both 'Certane').

In this Complaints Handling Policy (Policy), Certane are also referred to as 'we', 'our' and 'us'. Where we have used a term in this Policy that is defined in the *Corporations Act 2001* (Cth) (Corporations Act) and the National Consumer Credit Protection Act 2009 (NCCP Act) that term will take the meaning given to it in that act unless otherwise stated.

The purpose of this Complaints Handling Policy is to provide you as the client with key information about how we will manage complaints from retail clients (you) about the financial products and services provided by Certane Corporate Trust.

This Policy sets out:

- information about who we are;
- our complaints management framework;
- how you may lodge a complaint with us
- the process for lodging a credit complaint;
- the options available to you if you need additional assistance to lodge a complaint;
- our key steps we follow for dealing with complaints, including acknowledgement, assessment and investigation, and provision of an IDR response;
- our response timeframes; and
- details about accessing the Australian Financial Complaints Authority (AFCA) where a complaint is not resolved within the required timeframe, or to your satisfaction.

This Complaints Handling Policy is part of the Certane Complaints Management Framework which also includes Certane complaints policies and procedures and



Internal Dispute Resolution (IDR) procedures. These documents set out how Certane handles complaints, including the governance arrangements that apply to complaints handling and the procedures which assist us to respond to complaints quickly and effectively.

This Policy is available in hard copy on request - to request a copy please find our contact details below:

**Call:** +61 2 9097 2800,  
Monday to Friday, 8am–5pm (AEST/AEDT)

**Email:** [complaints.ct@certane.com](mailto:complaints.ct@certane.com)

**Write to:** Complaints Officer  
Certane Corporate Trust,  
Level 6, 76-80 Clarence Street,  
Sydney NSW 2000



## About us

Certane Corporate Trust and Tidswell Financial Services are Australian Financial Services (AFS) and Australian Credit (AC) Licensees and provide custodian and trustee services to retail and wholesale clients by partnering with responsible entities/trustees, corporates and ADIs who issue, manage, promote and distribute financial products.

## What is a complaint?

A complaint is:

*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. (as set out in AS/NZS 10002:2022.)*

What does this mean for you?

If you are unhappy with any of our products or services, and you tell us about it, we will generally treat this as a complaint (e.g. where you are eligible to make a complaint and your enquiry meets the definition of a complaint).

If we do not think you are expecting a response from us and we are not otherwise obliged to give you a response, we may treat your enquiry as feedback instead of as a complaint and use it to help us improve our products and services.

However, we will only do this if it is reasonably clear that your enquiry does not meet the definition of a 'complaint' set out above.

You are generally eligible to make a valid complaint to us if you are:

- A client of Certane or
- A consumer of credit activities engaged in by a credit licensee or its representatives.

Your complaint will be handled with:

- Fairness including procedural fairness,



- In a way that respects language and cultural differences that may affect the complaint process,
- Care for those clients who experiencing hardship, vulnerability and mental distress.

## How to make a complaint

You can complain to us at any time, and in any way. You can call us, send us a letter or email and you should state how you would like to be contacted.

We recommend you use the contact details on our website for complaints and feedback as this will allow us to deal with your complaint quickly and efficiently. Our contact details are as follows:

**Call:** +61 3 9097 2800, Monday to Friday, 8am–5pm (AEST/AEDT)

**Email:** [complaints.ct@certane.com](mailto:complaints.ct@certane.com)

**Write to:** Complaints Officer,  
Certane Corporate Trust ,  
Level 6, 80 Clarence Street,  
Sydney NSW 2000 Australia.

### *Posting on Social Media*

We may treat posts on certain social media platforms as complaints. If you post on a platform that we own or control, we may try to contact you to confirm your information, so that we can respond to you. We will always respect your privacy while on social media. We will not ask you to make your personal information public.

### *Credit Complaints*

#### *Our Partners*

Certane is either trustee or custodian of certain managed investment schemes and/or master trusts (together the “**Trust**”) and holds an Australian Financial Services Licence for these purposes. Where we Certane Corporate Trust acts as



custodian where the Trust lends money to a consumer, Certane Corporate Trust will be lender of record, in relation to the loan, or lessor in relation to a lease.

We partner with mortgage/loan managers who are responsible entities/trustees providing credit assistance to consumers. Our relationship with them involves the responsible entity/trustee appointing Certane Corporate Trust as the custodian of the Trust.

*Is your complaint about us or one of our credit provider clients (responsible entities/trustees)?*

Certane Corporate Trust acts as the Custodian and lender on record for credit contracts. As such we are not directly involved with the origination or administration of the loans. This means that when you make a complaint it may be transferred to our client to deal with directly. This will also apply to complaints lodged with AFCA.

If your complaint relates to a credit contract and you wish to lodge the complaint at AFCA please note the complaint should be lodged against the loan originator/ administrator, if it is lodged against Certane Corporate Trust we will contact AFCA to redirect your complaint to the loan administrator.

However if your complaint relates to a service directly provided by Certane Corporate Trust then this Policy will apply, and we will ensure all of the issues you have raised in your complaint are managed appropriately.

*If you need assistance making a complaint*

We know that accessing and understanding financial services can be difficult. If you think you need help with making your complaint, please contact us and we will arrange the appropriate assistance for you. This may include access to language services or disability support services.



## What happens after you make a complaint?

This section summarises the key steps we follow when dealing with complaints, including acknowledgement, investigation, and provision of an IDR response. We have also included our response timeframes in this section.

The timeframes set out below will start to run when we receive a complaint that relates wholly or partly to our services.

### **Step One: We will acknowledge your complaint**

We will confirm with you that we have received your complaint. Generally, we will do this in the same way you contacted us to raise your complaint, unless you tell us otherwise.

This means that if you email us, we will acknowledge your complaint by email, if you call us, we will acknowledge your complaint in the call or with a call back (if possible).

We want to ensure that our complaints process is easy to navigate, so you can direct us as to how you want us to contact you about your complaint. Just let us know if you have a communication preference when you lodge your complaint or at any time during the complaints process.

### Timeframes

We will acknowledge your complaint as soon as we can and otherwise within 1 business day of receiving it.

### **Step Two: We will investigate your complaint**

We will make every effort to respond to you as quickly as we can and if possible, we will resolve your complaint on the spot. Where necessary we will investigate any issues you have raised in your complaint and provide you with a formal internal dispute resolution (**IDR**) response. As part of our investigation we may contact you to request more information about your complaint or supporting materials.





## Timeframes

Depending on the nature of the complaint, the maximum amount of time we can take to resolve your complaint is outlined in the table below;

<b>Type of Complaint</b>	<b>Timeframe to provide an IDR Response</b>
<u><i>Standard complaints</i></u>	Acknowledge the receipt of the dispute within 24 hours (Verbally or in Writing). Provide a written response, no later than 30 calendar days after receiving the complaint.
<u><i>Traditional trustee complaints</i></u>	No later than 45 calendar days after receiving the complaint.
<u><i>Credit-related complaints involving default notices</i></u>	No later than 21 calendar days after receiving the complaint.

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

No later than 21 calendar days after receiving the complaint. Exceptions apply where we do not have sufficient information to make a decision, or if an agreement is reached with the complainant.

**Insufficient information**

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.

**Agreement reached**

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.

## Delays

We will always try to respond within the timeframes set out above. However, if your complaint is complex or delayed by circumstances beyond our control, we may contact you to notify you that we will not be able to respond within the timeframes set out above.

If we contact you about a delay we will also provide:

- the reasons for the delay;
- information about your right to complain to the Australian Financial Complaints Authority (**AFCA**) if you are dissatisfied; and
- the contact details for AFCA.

## **Step Three: We will respond to your complaint**

We will generally provide you with a written IDR response if resolution takes longer than 5 business days (however in some circumstances we will provide an IDR response if it is resolved within 5 business days), if you request a written response, or if the complaint is about financial hardship.

If we provide you with an IDR response it will include:

- the final outcome of your complaint at IDR;
- either:
  - confirmation of actions we have taken to fully resolve the complaint; or
  - our reasons for rejecting or partially rejecting your complaint;
- any additional information or context necessary for you to understand our IDR decision;
- information about your right to take your complaint to AFCA if you are not satisfied with our IDR response; and
- the contact details for AFCA.

## Other Important Information

### What does a complaint cost?

The complaints process is free of charge, including IDR review.

### Australian Financial Complaints Authority (AFCA)

You can complain to AFCA at any time, or if you are not satisfied with our IDR response or we have not resolved your complaint within the prescribed timeframes (outlined above), you can lodge a complaint with AFCA. AFCA provides fair and independent financial services complaint resolution that is free to consumers.

#### AFCA's contact details are below:

**Website:** [www.afca.org.au](http://www.afca.org.au)

**Telephone:** 1800 931 678 (free call)

**Email:** [info@afca.org.au](mailto:info@afca.org.au)

**In writing to:** Australian Financial Complaints Authority  
GPO Box 3, Melbourne  
VIC 3001