

Internal Dispute Resolution Policy

1. Purpose

As the Responsible Entity and trustee of registered managed investment schemes, Assetora acknowledges its obligation under sections **601FC(1)(a)** and **912A** of the *Corporations Act 2001 (Cth)* to operate its schemes honestly, fairly, and efficiently. This includes maintaining a robust, timely, and accessible Internal Dispute Resolution (IDR) framework.

This policy outlines Assetora's internal procedures for managing and resolving complaints in relation to the financial services it provides, in accordance with:

- **ASIC Regulatory Guide 271: Internal Dispute Resolution (RG 271);**
- **Australian Standard AS 10002:2022 Guidelines for Complaint Management;** and
- **AFS licence obligations**, including membership of the **Australian Financial Complaints Authority (AFCA)**.

Assetora recognises that a well-functioning complaints management process is essential to good governance, risk management, and client service delivery.

2. Scope

This policy applies to all complaints received by Assetora in relation to the financial products and services it offers under its Australian Financial Services Licence (AFSL).

The Internal Dispute Resolution framework applies to:

- **Clients and investors** of any Assetora-managed fund, including the Assetora Investment Fund;
- **Authorised representatives**, dealers, advisers, service providers and contractors; and
- **Staff or any other person** who interacts with Assetora in the delivery of its financial services.

All employees and representatives of Assetora are expected to promptly identify, acknowledge and manage complaints in accordance with this policy and the relevant regulatory requirements.

3. Definition of a Complaint

In line with **RG 271.27**, a complaint is defined as:


“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.”

4. Internal Dispute Resolution Procedures

4.1 Receiving Complaints

Assetora welcomes complaints as a means to improve products, services and customer experience. Complaints may be made in writing or verbally to the Complaints Officer using the following contact details:

 Email: cs@assetora.com

 Phone: 1300 365 930

Complaints may also be received via third parties or representatives, in any format (including oral), and reasonable support will be provided for complainants with vulnerabilities or language barriers.

4.2 Acknowledgement

All complaints will be acknowledged within **24 hours (1 business day)**, or as soon as practicable if not possible within that timeframe. All complaints are to be logged and tracked in Assetora's complaints register.

4.3 Assessment and Resolution

Assetora aims to resolve all complaints **within 30 calendar days** of acknowledgement for standard complaints and **within 21 calendar days** for complaints related to financial hardship. Where resolution is not possible within this timeframe, Assetora will issue a **delay notification** in accordance with RG 271.65–271.73 and inform the complainant of their right to escalate the matter to AFCA.

Where appropriate, unresolved complaints may be referred to **external mediation** coordinated by Assetora.

4.4 Governance and Oversight

Unresolved complaints or systemic issues identified through the IDR process will be escalated to the **Compliance Committee** and reported to the **Board**, as part of Assetora's broader trustee governance obligations.

In accordance with the **Assetora Master Compliance Plan**, all complaints will be reviewed **at least monthly** or as they arise to determine whether they give rise to:

- Breaches or reportable incidents;
- Conflicts of interest; or
- Risk control failures.

This ensures a continuous feedback loop to strengthen compliance and service quality.

5. Resolving Complaints

Assetora will endeavour to address all aspects of the complaint that can be resolved via remedies and will provide follow-up assistance where appropriate. Assetora will, where appropriate, offer remedies to complainants that are both non-financial as well as, or instead of, financial remedies. Such remedies may include but are not limited to:

- financial assistance (e.g. arranging for the Account holder to access additional services to the value of the agreed loss or damage);
- other assistance (e.g. where there has been unauthorised or mistaken transactions relating to the facility or loss or theft of the device (if any) through which the facility is used);
- compensation; or
- Where a financial remedy is considered appropriate in the circumstances, Assetora will seek to offer compensation that is fair.

In determining the most appropriate remedy, Assetora will take into consideration any direct loss or damage suffered by the complainant as well as any relevant legal principles, relevant codes of conduct, fairness and relevant industry best practice.

In dealing with a complaint, Assetora may, in appropriate circumstances, offer remedies to other parties who have suffered in the same way as the complainant, but did not make a formal complaint.

Any material given to the complainant explaining IDR Procedures will be provided free of charge. Any complaint about a service will be handled by Assetora free of charge (subject to statutory requirements).

6. Recording and Monitoring Complaints

When a complaint is first received, the Complaints Officer will enter all information concerning the complaint into the complaints register (detailed in Annexure A). Any additional correspondence from the complainant must also be recorded in the complaints register.

The information contained in the complaints register will comply with the National Privacy Principles. Assetora will inform individuals of what sort of personal information is held and for what purposes, including the method of collection, storage, use, accuracy and disclosure of information.

The Complaints Officer will be responsible for any trend analysis with respect to complaints. This may assist in identifying any systemic issues that may require remedial action. The Chief Risk & Compliance Officer and Compliance Officer review the operation of the IDR Procedures annually, including the complaints register, the number of complaints received, the type of activity complained of and the length and outcome of dealing with complaints.

7. Unresolved Complaints

If Assetora cannot resolve a complaint within 30 days, Assetora will inform the complainant that they have been unable to resolve the dispute, and that the complainant may wish to start the mediation process with Assetora's external dispute resolution provider AFCA.

In accordance with Australian Standard AS ISO 10002-2018, Assetora subscribes to the following essential elements of effective complaints handling:

Fairness	Assetora's IDR Procedures recognises the need to be fair to both the complainant. Fairness rests on three qualities—impartiality, confidentiality and transparency. Assetora has therefore implemented a system whereby the complaint can be properly identified and investigated by staff who are not involved in the subject matter of the complaint, i.e. a Complaints Officer.
Resources	Assetora has adequate resources for complaints handling given the size of the business.
Feasibility	Assetora's IDR Procedures will be well publicised to representatives and clients. The disclosure document, which all clients will receive, will contain information about the process of making a complaint.
Access	Assetora's IDR Procedures are accessible to all representatives. Assetora's IDR Procedures are easy to understand and use and are drafted in plain language.
Assistance	Assetora will provide assistance to clients in relation to the formulation and lodgement of complaints.
Responsiveness	Assetora ensures that complaints will be dealt with quickly and the complainant shall be treated courteously.

Charges	Assetora does not charge any handling fee in relation to complaints made against it on an internal basis.
Remedies	Assetora's IDR Procedures have the capacity to determine and implement remedies.
Data Collection	Assetora has an appropriate systematic recording of complaints and outcomes as it maintains a complaints register.
Systematic and Recurring Problems	The Complaints Officer is responsible for any trend analysis with respect to complaints. In addition, the Chief Risk & Compliance Officer reviews the complaints trends monthly and the policy and register annually.
Accountability	The Complaints Register is available for inspection by ASIC upon request and is lodged biannually directly to ASIC via the prescribed portal.
Reviews	Assetora's IDR Procedures are reviewed annually by the Head of Compliance to ensure that it is efficiently delivering effective outcomes. Assetora's IDR Policy is reviewed annually by the Chief Risk & Compliance Officer.

8. What you should do if you have a Complaint

If you have a complaint or dispute relating to the financial services provided to you by Assetora, you should contact Assetora in the first instance.

If the complaint or dispute is not satisfactorily resolved by Assetora, you should contact Assetora's external dispute resolutions provider, the Australian Financial Complaints Authority (AFCA) of which Assetora has membership.

If the complaint or dispute is unable to be settled immediately to your satisfaction, your complaint or dispute will be acknowledged within 1 business day.

Assetora may request further details from you.

A final response will be provided within 30 days from acknowledging your complaint or dispute. If we are unable to resolve your complaint to your satisfaction after the 30 days, you may be eligible to escalate the complaint to the Australian Financial Conduct Authority (AFCA).

The **Australian Financial Complaints Authority (AFCA)** through the following channels:

 **Phone**

Free call within Australia: 1800 931 678

Available Monday to Friday, 9:00 AM – 5:00 PM
AEST/AEDT

International callers can dial: +61 1800 931 678



Email

General inquiries and complaints: info@afca.org.au



Online Complaint Form

Submit a complaint online via AFCA's portal:

<https://www.afca.org.au/make-a-complaint>



Postal Address

Australian Financial Complaints Authority

GPO Box 3

Melbourne VIC 3001



Fax

Within Australia: (03) 9613 6399



Accessibility Services

Interpreter Service:

Call 131 450 and ask to be connected to AFCA at 1800 931 678.

National Relay Service (NRS):

For individuals who are deaf, hard of hearing, or have a speech/communication difficulty, contact AFCA through your preferred NRS call channel and provide the number 1800 931 678.

If you need assistance with a complaint or understanding the process, feel free to ask Assetora for assistance.

Note: AFCA will not consider complaints or disputes that have not first been brought forward to Assetora. (See Annexure B - AFCA complaint resolution process)

9. Adoption of Policy

This policy was adopted by the Board on 15 October 2025

ANNEXURE A - RECORDING COMPLAINTS, IDENTIFYING & RECORDING SYSTEMIC ISSUES

We will record information in the following tabular form, this is held within our directory:

Complaints\Internal Dispute Resolution

ASSETORA LIMITED - REGISTER OF COMPLAINTS FORM

Under ASIC's Internal Dispute Resolution (IDR) reporting framework, Australian Financial Services Licensees (AFSLs) are required to submit biannual complaint data reports. These reports must adhere to specific formatting and content guidelines as outlined in the IDR Data Reporting Handbook.

Complaints will be classified into the following categories to support systemic issue tracking and regulatory reporting to ASIC:

- | | |
|------------------------|---|
| • Personal Data | demographic information such as age, gender and postcode. * |
| • Product | concern about the structure or risks of a managed fund |
| • Service | delays or errors in fund administration or processing requests |
| • Fees/Charges | queries or dissatisfaction with disclosed or deducted fees |
| • Conduct | inappropriate behaviour or poor communication from staff or representatives |
| • Third-Party Provider | custodian or administrator performance complaints |
| • Privacy/Data | how personal information has been used or stored |
| • Platform/Technology | online access or investor portal issues |
| • Other | matters not captured above |

* Handling of Personal Information

In collecting and reporting IDR data, AFSLs may gather personal information about complainants, such as age, gender, and postcode. However, it's important to note:

- **Purpose Limitation:** This personal information is collected solely for the purpose of complying with ASIC's IDR reporting requirements and is not used for any other purpose.
- **No Impact on Advice:** The collected personal information is not taken into account or used when providing personal financial advice to clients.
- **Privacy Compliance:** AFSLs must handle all personal information in accordance with the Privacy Act 1988, ensuring that data is collected, stored, and used responsibly and securely.

For comprehensive guidance on IDR data reporting, including definitions and permissible values for each field, refer to the IDR Data Reporting Handbook on ASIC's website.

If you require assistance with interpreting specific fields or aligning your internal complaints register with ASIC's requirements, feel free to ask.

Documents you might need

Different information and documents will normally be required for different types of complaints, but the general categories of documents and information following will be most helpful:

Evidence/supporting documents:

These are the information, reports, assessments, photos, receipts, correspondence, bank and other financial statements that provide background to your complaint and that are likely to be relevant to the issues you have raised.

It is also important not to write notes directly onto complaint documents as it can make it difficult to interpret your comments and it also changes the primary evidence.

Claim details:

This is the remedy, including any sum of money, or other outcome that you are seeking to resolve your complaint. Any relevant calculations of a claim for financial loss or compensation should be provided. You should also include documents, or references to documents that help us understand how you calculated your claim.

Timeline/chronology of events:

This should clearly explain what happened and when. The more complex the complaint, the more important it is to have this information. It also helps everyone to understand the order of events that have happened in relation to your complaint.

Other documents:

Including but not limited to:

- Financial advice, financial plans or Statements of Advice
- Prospectus or Product Disclosure Statements
- Fact find/Needs analysis
- Investment or account statements
- Service agreements

ANNEXURE B

This policy is designed in accordance with ASIC Regulatory Guide 271 (RG 271), which sets out enforceable standards for internal dispute resolution including maximum timeframes for response, fair and timely handling, and complaint accessibility. Assetora's IDR process aims to meet or exceed these requirements.

To ensure fairness and accessibility, Assetora accepts complaints in any format (written, oral or otherwise), including from authorised representatives or third parties. We provide reasonable assistance to complainants, particularly those with vulnerabilities or limited English proficiency.

Assetora acknowledges and complies with the maximum IDR response timeframes as outlined in RG 271, including 30 calendar days for standard complaints and 21 calendar days for complaints involving financial hardship. Where a complaint is not resolved within these timeframes, Assetora will issue an IDR delay notification in accordance with RG 271.65–271.73.

Unresolved complaints or systemic issues identified through the IDR process are escalated to the Compliance Committee and reported to the Board as part of Assetora's governance and oversight obligations as a trustee. Complaint data is also reviewed regularly to identify trends or process improvement opportunities.

As part of Assetora's obligations under the Compliance Plan, all complaints will be reviewed on at least a monthly basis, or as they arise, to identify whether they give rise to any potential or actual breaches, conflicts of interest, or risk matters. This review forms part of Assetora's commitment to maintaining a compliant and responsive internal dispute resolution framework.

Systemic issues identified through the IDR process will be documented and escalated. Where appropriate, Assetora will initiate remedial action such as process amendments, updated staff training, or revision of disclosure documents.

Where resolution within the IDR timeframe is not possible, and prior to escalation to AFCA, Assetora may offer external mediation through an independent facilitator to resolve the matter efficiently. [Added by Jill Wilson]

Assetora staff are trained to assist complainants in lodging their complaints, including those who may require support due to language, disability, or other vulnerability.

In circumstances where complaints give rise to a significant breach or recurring non-compliance, Assetora will consider its breach reporting obligations under s912D of the Corporations Act.

All relevant staff will receive annual training on the IDR framework, including procedures for receiving, escalating and resolving complaints in accordance with RG 271. This training will be delivered in accordance with the Assetora Training Policy.

This policy will be reviewed annually or following a material complaint event or regulatory change. Review outcomes will be documented and approved by the Compliance Committee.

All complaints received will be handled in accordance with Assetora's Privacy Policy. Personal and sensitive information collected during the IDR process will be securely stored and used only for the purpose of resolving the complaint or meeting regulatory obligations.