

# COMPLAINTS POLICY

## **PURPOSE OF THE POLICY**

This policy has been written to align with the complaints handling framework prescribed by the Constitution of the schemes managed by Ingenia Communities' RE Limited ('Responsible Entity'), the Corporations Act 2001 and the guidelines set out in the Australian/New Zealand Standards AS/NZ 10002:2014 Guidelines for Complaint Management in Organisations.

In all cases, the Responsible Entity will endeavour to resolve any complaint received within 48 hours. In the event that this standard is not achieved an explanation will be placed on file explaining why this standard cannot be achieved and the security holder will be fully informed as to the status of the complaint and expected timeframe for resolution.

### **DEFINITION OF A COMPLAINT**

Australian Standard Complaints Handling defines a complaint 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".

Common examples of complaints that may be received by the Responsible Entity include (but are not limited to):

- not receiving a distribution cheque on time;
- not being notified of suspension of distribution or distribution reinvestment plan appropriately;
- not having a change of investor details recorded correctly.

### PRINCIPAL PROCEDURES FOR MAKING A COMPLAINT

Security holders wishing to complain must direct their complaint in the first instance to the Investor Relations Manager of the Responsible Entity, who has been appointed as the principal point of contact for dealing with investor complaints and may be contactable as follows:-

Group Investor Relations Manager

C/- Ingenia Communities RE Limited

Level 9, 115 Pitt Street

Sydney NSW 2000

Phone: +61 1300 132 946

Email: investor@ingeniacommunities.com.au

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The Responsible Entity has also appointed Link Market Services Limited ("Registry") to provide registry services to the schemes managed by the Responsible Entity and to act as the main point of contact for investors to make inquiries in respect of the Schemes managed by the Responsible Entity. Any complaints received via the Registry will be resolved by the Registry or forwarded to the Ingenia Communities Group Investor Relations Manager for resolution.

### **GUIDELINES FOR DEALING WITH COMPLAINTS**

The Responsible Entity has put in place the following guidelines for dealing with complaints from a security holder.

- 1. The Responsible Entity may receive a complaint from a security holder in a variety of different forms including telephone, email, or in writing. The Responsible Entity will attempt to resolve all complaints within 48 hours of the complaint being received.
- 2. In the event the security holder's complaint is not resolved within 48 hours, the Responsible Entity will:
  - a) Acknowledge receipt of the complaint within 48 hours;
  - b) Advise the security holder why this complaint will not be able to be resolved within 48 hours and in doing so, provide details of steps that need to be taken to resolve the complaint; and
  - c) Inform the security holder of an expected timeframe for resolution and keep the security holder updated on developments relating to the complaint at all times.
- 3. In responding to the security holder's complaint, the Responsible Entity will need to make reference to the steps taken to resolve the complaint and if the security holder is not satisfied with the action taken, provide them with details of a further avenue or remedies that they may take to resolve the complaint.

All responses to complaints via email or in writing must contain the following paragraph:

"Ingenia Communities RE Limited (Responsible Entity for Ingenia Communities) is required by law to be a member of an independent resolution scheme, namely the Financial Ombudsman Service ("FOS"). If you feel your complaint remains unresolved or you wish FOS to further investigate your complaint, you can contact FOS as detailed below.

By telephone: 1300 78 08 08

In writing: Financial Ombudsman Service Limited

GPO Box 3

**Melbourne VIC 3001** 

Website: www.fos.org.au

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- 4. The Responsible Entity will maintain a register of all complaints received. This register will provide details of:
  - date the complaint was received and ultimately resolved;
  - who the complaint was from (including HIN & SRN details if available);
  - nature of complaint; and
  - action taken to resolve the complaint.

It is the responsibility of the Ingenia Communities Group Investor Relations Manager to maintain this register and forward a copy of the register to the Compliance Manager monthly.

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