

COMPLAINTS HANDLING POLICY
DHA INVESTMENT MANAGEMENT LIMITED



DHA
Investment
Management

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Owner:	Chief Operating Officer

1 Introduction

The Complaints Handling Policy (Complaints Policy) sets out guidelines that should be followed in managing complaints received from members in DHA Residential Property Funds.

2 Objectives

The primary objectives of the Complaints Policy are to ensure complaints are:

- dealt with in an efficient, equitable and timely manner;
- managed in accordance with the DHA Investment Management Limited (DHA IML) Fund's Constitution and Compliance Plan; and
- accurately recorded with any remedial actions implemented, supporting a continual improvement philosophy.

3 Scope

This Policy has been developed to ensure compliance with the DHA IML Fund's Constitution and Sections 912A(1)(g) and 912A(2) of the *Corporations Act 2001* (Corporations Act) and complies with Regulatory Guide 165: Licensing: Internal and external dispute resolution (Reg165), issued by the Australian Securities and Investments Commission (ASIC).

As an Australian Financial Services (AFS) licensee and in accordance with the Corporations Act, this Policy must be available for retail clients.

4 Policy statement

The Complaints Policy consists of:

(a) Internal Dispute Resolution (IDR) procedures that:

- comply with the standards and requirements made or approved by ASIC;
- cover complaints made by members in relation to the financial services provided; and

(b) membership of one or more ASIC-approved External Dispute Resolution (EDR) schemes that covers—or together cover—complaints made by members in relation to the financial services provided.

A complaint is defined as an expression of dissatisfaction made to an organisation, related to its products or services, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected – RG 165.90 and AS ISO 10002-2006 – Customer satisfaction—Guidelines for complaints handling in organisations.

5 Lodging a complaint

All complaints to be directed as follows:

The Secretary
DHA Investment Management Limited
26 Brisbane Avenue
Barton ACT 2600

T: 139 DHA (139 342) or

E: help@dha.gov.au

6 Guidelines for dealing with complaints

In dealing with complaints the following principles should be followed:

- act in a professional and courteous manner at all times;
- acknowledge receipt of the complaint immediately or as soon as practicable;
- obtain background information and an explanation in relation to the circumstances giving rise to the complaint;
- the complainant is kept informed of progress;
- final decision is in writing and where relevant, quoting any legislation, code or regulation; or
- option for the complainant to refer the matter to the external dispute resolution scheme.

If unsure whether a unit holder has raised a formal complaint or how to proceed, contact the Compliance Officer immediately.

7 External dispute resolution scheme

Where a dispute cannot be resolved in-house the client should be referred to an External Dispute Resolution Scheme. DHA IML is a member of the Financial Ombudsman Service Limited for this purpose.

Financial Ombudsman Service Limited

GPO Box 3

Melbourne VIC 3001

T: 1300 780 808

F: 03 9613 6399

E: info@fos.org.au

W: fos.org.au

8 Training

It is the responsibility of the Compliance Officer to ensure all staff handling complaints are familiar with this Policy and associated guidelines.

9 Reporting

The Compliance Officer is responsible for maintaining the Complaints Register. Completed Complaints Forms and supporting related documentation are retained for each complaint for a period of 7 years.

A report detailing the complaints received and resolutions is to be provided at each Compliance Committee meeting.

Where material system failure is identified as the cause of a complaint, the Compliance Officer is to immediately report to the Compliance Committee and Board.

10 Review

This policy should be reviewed annually or as deemed appropriate given prevailing circumstances, such as change in legal obligations of licensees.