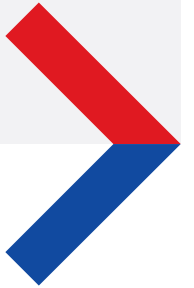


CFS Complaints Management Policy



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Purpose and scope

This Complaints Management Policy (Policy) is a key component of Colonial First State's (CFS) complaint management framework and it explains how we aim to provide our customers with a high quality complaints experience, through their channel of choice, with fair outcomes that are consistent across the organisation.

This Policy sets out:

- our complaint management principles
- the complaints process, and
- details for accessing the Australian Financial Complaints Authority (AFCA)

This Policy applies to CFS, our people and third parties responsible for managing customer complaints on behalf of CFS.

Policy statement

In managing complaints we take a proactive and customer-focused approach with a strong commitment to addressing any issues raised within reasonable timeframes and regulatory obligations.

We aim to facilitate a timely, fair and consistent process for our customers that is sensitive to their personal circumstances. We use customer complaint information to understand root causes, identify issues and put things right.

Our complaint management principles

Instil a culture that welcomes and values complaints

- We take the time to listen to and understand our customers' concerns.
- Everyone has the right to make a complaint. Our complaints process is free and we will make it easy for our customers to access it.
- We keep our customers or their representatives updated on the progress of their complaint, use plain English and consider any communication or accessibility assistance they may need.
- We consider our customers' personal circumstances with sensitivity and respect, and particularly if they are experiencing vulnerability, provide appropriate support.

Manage complaints fairly, effectively and efficiently

- We investigate complaints thoroughly and without unnecessary delay, ensuring the investigation is conducted fairly, objectively and without actual or perceived bias.
- We apologise as soon as we become aware we have done the wrong thing or not met customer expectations and make things right.
- We make a genuine attempt to resolve complaints as timely as possible, and provide a fair and equitable resolution to complainants or all parties to the complaint.
- Our employees and representatives are empowered to act with authority and integrity when investigating and resolving complaints.

Learn and improve

- We analyse complaint data regularly to learn from the complaints we receive.
- We escalate any issues that could impact other customers.
- We conduct regular and ongoing quality assurance of complaint management activity, including audits and improve our processes.

The complaints process

We are committed to making it easy for our customers to make a complaint. The key steps in our complaints management process are as follows:

Identify

We will ensure that there is an organisation-wide understanding of the definition of 'complaint' and the types of matters that must be dealt with in line with this Policy to ensure a proactive approach of identifying complaints. We do not expect a customer or their representative to expressly state the word 'complaint' nor do we expect a complaint to be put in writing in order to trigger our obligations to deal with the matter.

Record and acknowledge

Once a complaint is identified, we will record and acknowledge receipt of the complaint within 24 hours (or one business day) of receiving it, or as soon as practicable.

Investigate and respond

- We will investigate all the circumstances and information surrounding the issues raised in the complaint. The level of investigation will be commensurate with the complexity of the complaint. Complaint investigations are guided by our principles to manage complaints fairly, effectively and efficiently.
- Once the investigation has been completed, we will provide a written response to the complainant which will address all matters raised within the complaint.
- Where possible we will always attempt to resolve a complaint when it is first raised. Complaints resolved by the end of the fifth business day after receipt do not require a written response. In these circumstances, resolution involves confirming the complainant's satisfaction that the matter is resolved or providing the complainant with an explanation and/or apology where no further action can be taken to reasonably address the complaint.

- We must provide a written response, if the complainant requests a written response or in relation to complaints on the following matters, even where the complaint is resolved by the end of the fifth business day:
 - hardship
 - a declined insurance claim
 - the value of an insurance claim, or
 - a decision of a superannuation trustee.
- We will respond formally in writing when resolving all other complaints within the timelines outlined below – see 'Closing the complaint' on the next page.
- The level of detail contained in a response will reflect the complexity of the complaint and the nature and extent of any investigation conducted by us.
- At a minimum, in our response, we will provide information on:
 - the final outcome of the complaint, including confirmation of actions taken to fully resolve the complaint or reasons for rejection or partial rejection of the complaint
 - the rights of the complainant to take the complaint to AFCA if they are still not satisfied with the response
 - contact details for AFCA.
- In circumstances where the complaint is rejected or partially rejected, our response will set out the reasons for our decision. The response will outline:
 - our identification and addressing of all the issues raised in the complaint
 - our findings on material questions of fact and reference to the evidence/information which supports those findings, and
 - enough detail for the complainant to understand the basis of our decision in order to be fully informed when deciding whether to escalate the matter to AFCA or not.

The complaints process

When will a response be received?

Maximum timeframes

- Our aim is to resolve a complaint as timely as possible. We will ensure that any complaint is properly considered and responded to in a timely manner.
- There are different maximum timeframes for us to provide a response, depending upon the types of complaint:
 - For superannuation/pension related (other than superannuation death benefit distribution) complaints, we must provide a response within 45 days after receiving the complaint.
 - For general investment/IDPS related complaints, we must provide a response within 30 days after receiving the complaint.
 - For complaints relating to superannuation death benefit distribution, we must provide a response within 90 days after the expiry of the 28 day period for objecting to a proposed death benefit distribution.

When delays occur in resolving a complaint

- In certain circumstances, we may not be able to reach a resolution and provide a response within the relevant maximum timeframe. This will include complaints where:
 - resolution of the complaint is particularly complex, and/or
 - circumstances beyond our control have caused complaint management delays.
- If this occurs, we will continue to provide regular updates on the progress of the complaint and before the maximum timeframe is reached, we will give the complainant a delay notification letter, informing the complainant:
 - the reasons for the delay
 - the right to complain to AFCA if they are dissatisfied with the delay
 - the contact details for AFCA.

Closing the complaint

Before closing a complaint, we will ensure that complaint resolution outcomes (e.g. refunds, fee waivers, correction of records, compensation payments) are implemented in a timely manner and with the best interests of our customers at heart.

The complaints process

How to lodge a complaint

We provide various channels that a complaint can be made. To lodge a complaint, we have listed our contact details for each product in the CFS Group.

Website: Submit a complaint via our online feedback form at: cfs.com.au/feedback

CFS FirstChoice

Phone: 13 13 36

Email: contactus@cfs.com.au

Website: cfs.com.au/complaints

Mail: Complaints Resolution
GPO Box 3956, Sydney NSW 2001

CFS Edge

Phone: 1300 769 619

Online: Via 'Click to Chat' or the webform on the 'Contact us' page at cfs.com.au/cfsedge

Mail: Complaints Resolution
Locked Bag 20130, Melbourne VIC 3001

CFS Wrap

Phone: 1300 769 619

Email: complaints@cfs.com.au

Mail: Complaints Resolution
Locked Bag 3460 GPO,
Melbourne VIC 300

Commonwealth Essential Super

Phone: 13 4074

Email: contactessentialsuper@cfs.com.au

Mail: Complaint Resolutions
Reply Paid 27, Sydney NSW 2001

If emailing your complaint, please ensure you include the following information:

- Please send an email with the subject line: **Complaint**
- An account/investor number
- Preferred method of contact
- Details of the complaint
- What outcome is being sought to resolve the complaint.

Social media

CFS is contactable via Facebook, Twitter and LinkedIn. Please note if a complaint is initiated through one of these channels, the complainant will be contacted via private messaging and the complaint will be handled offline to ensure no private information is shared.

Next steps – Accessing AFCA

Whilst every attempt will be made to try and resolve a complaint to our customers' satisfaction, at times this may not be possible. In such circumstances, a complainant may lodge a complaint with AFCA. AFCA provides fair and independent financial services complaint resolution that is free to consumers.

AFCA contact details for complaint lodgement are:

Online: www.afca.org.au

Email: info@afca.org.au

Phone: 1800 931 678 (free call)

Mail: Australian Financial Complaints Authority
GPO Box 3, Melbourne VIC 3001

Compliance statement

This Policy forms part of the framework for managing customer complaints to support CFS's compliance with regulatory requirements to have in place an internal dispute resolution procedure that meets the standards or requirements made or approved by Australian Securities and Investments Commission.

Breach of this Policy will be regarded as serious misconduct, which may lead to disciplinary action.

Definitions

In this Policy, defined terms are capitalised. Those terms have the meaning given to them below or, if not defined below, in the CFS Policy Framework Glossary.

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.”
What is not a complaint?	<p>The following examples are not considered as complaints:</p> <ul style="list-style-type: none"> • staff grievances or employment-related complaints • simple requests for information • comments made about a firm where a response is not required • (for example, feedback provided in surveys, or reports intended solely to bring a matter to a financial firm’s attention – for example, that a link is not working on the website).
Complainant	<p>A person who is, at a minimum:</p> <ul style="list-style-type: none"> • an individual (including those acting as a trustee, legal personal representative or otherwise) • a superannuation product holder or third-party beneficiary eligible to make a complaint to AFCA under s1053 of the Corporations Act 2001, or taken to be a member of a regulated superannuation fund or approved deposit fund • a party to an agreement under the Family Law Act 1975 or order affecting superannuation. • In relation to the payment of a death benefit, any person who: • has, or claims to have, an interest in the death benefit, or • is, or claims to be, entitled to death benefits through a person with an interest in the death benefit.
Systemic issue	An issue arising from a complaint that affects, or has the potential to affect, more than one customer.

Additional support available

Where possible, we will proactively identify people who might need additional assistance. Specialised frontline staff are provided training to proactively identify, support and assist people who need help to make a complaint. We also allow representatives such as lawyers, financial counsellors, family and friends to lodge complaints on behalf of a complainant. We provide access to a translation service if a complainant requires this service and we support calls from the National Relay Service for customers who are deaf or hearing impaired.

Policy governance

Approver

Head of Remediation and Complaints as delegate for Colonial First State Investments Limited and Avanteos Investments Limited

Owner

Director of Complaints Resolution

Support

Business Unit Compliance

Review cycle

Annually

Relevant documents

Related internal documents

CFS Complaints Management Framework

CFS Policy Framework Glossary

CFS Complaint Management Procedure

CFS Unreasonable Complainant Conduct Policy and Procedure

External sources of obligations

AS/NZS 10002:2014 Guidelines for complaint management in organisations

ASIC RG 271: Internal Dispute Resolution and Enforceable provisions

ASIC Corporations, Credit and Superannuation (Internal Dispute Resolution) Instrument 2020/98

Corporations Act 2001 (Cth) – Section 912A (General obligations for financial services licensees)

ASIC Corporations (Internal Dispute Resolution Data Reporting) Instrument 2022/205