



(Security holder) Complaints Handling Policy and Procedure

Owner	General Counsel / Company Secretary
Application	Region
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1. Background

Region comprises Region Management Trust, Region Retail Trust (together, Trusts), Region RE Limited (“**Region RE**”) and any entities owned and / or managed, either beneficially or legally, by the Trusts or Region RE (“**Region**”).

This Policy applies to all Board members, employees, contractors and officers of Region.

2. Policy Objective

To:

- (a) ensure all complaints are handled in a timely and thorough manner and any negative consequences of the complaint are minimised; and
- (b) maximise trusted relationships with security holder; and
- (c) obtain greater understanding of key drivers of complaints;
- (d) identify emerging issues and inform product and service delivery improvements; and
- (e) minimise adverse consequences for Region.

2.1 What this Policy covers

- (a) In accordance with *ASIC Regulatory Guide 271*– Internal dispute resolution and *AS/NZS 10002:2014* 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.”
- (b) This Policy covers all complaints made (including written, verbal and via social media account owned/controlled by Region)

by retail clients in relation to the financial services provided by the relevant Region entity under the relevant Australian Financial Services Licence (ie where the complaint relates to a financial services obligation, securities or interests in the operation of the relevant Trust for which a Region entity is Responsible Entity).

2.2 Exclusions

This Policy does not cover:

- (a) complaints that are employment-related raised by staff – refer *HR Handbook* or *Whistleblower Policy & Procedure*;
- (b) complaints by tenants of a property held by Region. Tenant related complaints will be dealt with on a case by case basis;
- (c) comments about the Region entity where a response is not expected (for example, feedback on surveys or it is a notification to bring a matter to the entity’s attention).

3. Policy/Procedure

- (a) Each relevant Region entity will outline this Policy and the external dispute resolution scheme of which it is a member in all offering documents it issues, so that investors are aware of the complaints procedures should they wish to make a complaint. The Complaint Resolution Process set out in Attachment 3 will be available on Region’s website to assist investors in this regard.
- (b) The Compliance Officer will conduct training to ensure all employees, contractors and officers are aware of this Policy and the procedures set out below and assist people who need help to make a complaint.
- (c) All complaints must be managed in an equitable manner regardless of the

complainant's behaviour. In handling any complaint, it should be managed objectively, without bias and ensure that the privacy of the complainant (and their representative if applicable) are maintained.

3.1 Receiving complaints

People may complain to Region in any way that is convenient to the complainant whether in writing (received by post or email) or verbally (over the phone or in person) or via social media account owned/controlled by Region. This includes complaints lodged on behalf of complainants e.g. legal representatives, family, friends etc.

3.2 Triaging complaints

All complaints received must be referred to the Compliance Officer (or in the Compliance Officer's absence, to the General Counsel/Company Secretary) who will assess and prioritise the complaint according to urgency and severity.

3.3 First response

The Compliance Officer (or in the Compliance Officer's absence, the General Counsel/Company Secretary) will arrange for a written acknowledgement to be sent to the complainant within 24 hours (or one business day).¹ In the case of a complaint received from a representative of the complainant, the acknowledgement should be sent to the representative.

3.4 Register

The Compliance Officer must update the relevant Complaints Register and include the following details in that register:

- (a) the name of the Fund the Complaint is in respect of;
- (b) the name and contact details of each complainant;
- (c) the date and time each complaint was received;
- (d) the employee to whom the complainant first spoke and a brief summary of that employee's record of the conversation;
- (e) all correspondence concerning the complaint (including a record of conversations and written responses);
- (f) a report detailing how each complaint was resolved identifying and recording any systemic issues;
- (g) any other information the Compliance Officer deems appropriate.

3.5 Investigation

The complaint is investigated by the Compliance Officer who may be assisted by the relevant Responsible Manager and/or external service provider.

3.6 If resolved in 5 business days

A full response is not required to be provided to the complainant if the complaint has been resolved to their satisfaction or an explanation/apology is provided because the relevant Region entity can take no further action to reasonably address the complaint. Exceptions to this is where the complainant requests a written response or the complaint is about hardship.

¹ See, for example, clause 33.1 of the Region Retail Trust and Region Management Trust Constitutions - being generally within 24 and no longer than 48 hours.

3.7 Final Response (where the complaint is resolved between 5 business days and 30 calendar days)

- (a) As soon as possible after completing the investigation and in any event within 30 days of receipt of the complaint, the Compliance Officer must send the complainant:
 - (i) A full response covering details of the final outcome (whether resolution or reasons for rejection), the complainants right to take the complaint to the *Australian Financial Complaints Authority Limited* (“AFCA”) if they are not satisfied with the response and contact details of AFCA²; or
 - (ii) if a final response cannot be sent (due to complexity of the complaint and/or circumstances outside of Region’s control), an update of progress, reasons for the delay, right to complain to AFCA if they are dissatisfied and contact details of AFCA.
- (b) The Compliance Officer, in consultation with a Director of Region, will determine the most appropriate person to sign the response.

3.8 Types of remedy available

The types of complaints Region receives are highly varied and prescribing the set of responses is not

appropriate. The Compliance Officer will review each complaint received and provide a tailored response and proposed remedy³. All complaint resolutions must be implemented in a timely manner.

3.9 External Dispute Resolution

- (a) The final response should inform the complainant that if they are not satisfied with the response, they have access, at no cost to themselves, to an external complaint resolution scheme, AFCA, at:

Australian Financial Complaints Authority Limited
GPO Box 3
MELBOURNE VICTORIA 3001
Toll Free 1300 931 678
Fax (03) 9613 6399
Email info@afca.org.au
Website at www.afca.org.au
Lodge an online complaint at:
<https://www.afca.org.au/make-a-complaint/complain>
- (b) Region RE Limited is AFCA Member No. 31285.
- (c) The Compliance Officer will be the person primarily responsible for dealing with AFCA.

² See, for example, clause 33.1(c) of the *Region Retail Trust and Region Management Trust Constitutions*. Refer RG 271.53 for rejections of complaints, paragraph RG 271.54 lists information which must be included in the response. This includes identifying and addressing the issues raised in the complaint, Region’s findings on material questions of fact and referring to information that supports the findings, and providing enough detail for the complainant to understand the basis of the decision and be fully informed when deciding to complain to AFCA.

³ RG 271.161 provides examples of remedies (eg, (a) an explanation of the circumstances giving rise to the complaint; (b) an apology; (c) provision of assistance and support; (d) a refund or waiver of a fee or charge; (e) a goodwill payment; (f) a payment of compensation; (g) a waiver of a debt; (h) replacing damaged or lost property; (i) correcting incorrect or out-of-date records; (j) repairing physical damage to property; (k) changing the terms of a contract; (l) ceasing legal or other action that may cause detriment; and (m) undertaking to set in place improvements to systems, procedures or products). Note these are not prescribed remedies and are intended to be by way of illustration only. The ultimate remedy offered is at the discretion of the Compliance Officer.

3.10 Zero tolerance for rude, abusive behaviour

We understand that complainants may exhibit heightened emotions of dissatisfaction or even anger when providing a complaint. We have a legal responsibility to provide a safe working environment for employees. We do not tolerate any team members being abused, threatened or belittled, and vice versa. All matters must be addressed in a courteous manner. If you experience rude, abusive behaviour from a complainant please contact [xxxx]

3.11 Policy/Procedure review

- (a) If the basis of the complaint is valid, the relevant policy/procedure or service provider agreement must be reviewed and, where appropriate, necessary changes made to eliminate the cause of the complaint and/or reduce the prospects of the complaint occurring again.
- (b) All employees, contractors and officers of Region are encouraged to identify and notify the Compliance Officer of any systemic issues of which they may become aware arising from complaints.

3.12 Reporting

All complaints will be reported on a quarterly basis to the Audit, Risk Management and Compliance Committee (“ARMCC”) in respect of Region. Refer Attachment 2 on the data required for consideration.

The ARMCC will regularly analyse the data to identify systemic issues and take prompt action with appropriate accountabilities where required.

Information/data on complaints will be reported to ASIC on a regular basis as required by ASIC regulation.

3.13 Delegation

The Compliance Officer may delegate this function to another staff member who the Compliance Officer considers is appropriately qualified to handle complaints and who is supervised by the Compliance Officer in this role.

Attachment 1 – Information included in Complaints Register

Complaint Number – (e.g. 2012-01)
Name of product/fund
Name of Complainant
Complainant's contact details
Complainant's age
Complainant's gender
Complainant's postcode
Complaint status
How was the complaint received?
Date Received
Date closed
Number of days taken to resolve the complaint
Is the complaint about licensee or authorised representative of licensee?
Product or service subject of complaint
Summary of Complaint
Complaint outcome
Monetary remedy



Date Reported to ARMCC

Date of Acknowledgment

Relevant Policy/Procedure,
Compliance Plan Item

Date of Response

Summary of Response

Changes Required to
Policies/Procedures,
Compliance Plan

Attachment 2

[Extract from ASIC RG271: 183–184]

Report complaints data internally and publicly

Enforceable paragraph: Financial firms must provide reports about complaints data regularly to senior management and the firm's board (or equivalent).

These reports should include:

- (a) the number of complaints received;
- (b) the number of complaints closed;
- (c) the circumstances giving rise to complaints (e.g. products, services, and issues and reasons);
- (d) the time taken to acknowledge complaints;
- (e) the time taken to resolve or finalise complaints;
- (f) complaint outcomes, including:
 - (i) the number of complaints resolved;
 - (ii) the number of complaints unresolved;
 - (iii) the number of complaints that were abandoned or withdrawn; and
 - (iv) details of amounts paid to complainants to resolve complaints;
- (g) possible systemic issues identified;
- (h) the underlying causes of complaints;
- (i) complaint trends;
- (j) the number of complaints escalated to AFCA; and
- (k) recommendations for improving products or services.

Attachment 3

Complaint resolution process

Owner	General Counsel / Company Secretary
Application	Region
Version	1
Version Date	October 2023
Next Review Date	October 2025

1. Background

Region comprises Region Management Trust, Region Retail Trust (together, Trusts), Region RE Limited (“**Region RE**”) and any entities owned and / or managed, either beneficially or legally, by the Trusts or Region RE (“**Region**”).

2. A guide to our complaint resolution process

- (a) Region takes all complaints very seriously.
- (b) We have established internal processes and procedures to receive, investigate and address any complaints in relation to the financial services provided by Region RE (**us, we, our**) to you as a retail client. This policy, along with our internal processes and procedures have been developed in accordance with the *Corporations Act 2001*(Cth) and *ASIC Regulatory Guide RG 271* Internal dispute resolution to ensure your complaint is addressed fairly, timely and effectively.

3. Does your complaint relate to other matters?

- (a) This Policy applies to all expressions of dissatisfaction made to or about us relating to our financial products, financial services, staff or the handling of a complaint in respect of these products and services provided to you as a retail client and where a response or resolution is explicitly or implicitly expected or legally required.
- (b) It does not cover staff grievances or employment-related complaints, simple requests for information and comments made about us where a response is not required.
- (c) If your complaint relates to tenancy of an asset owned or managed by us, please contact the centre manager of the relevant asset directly in the first instance.

4. How to lodge a complaint

- (a) You can choose the following ways to inform us of your complaint:

By Post:

Compliance Officer,
Region,
Level 5, 50 Pitt Street,
Sydney NSW 2000

By E-mail: legal@region.au

By Phone: (02) 8243 4900

- (b) Please set out all the details that you consider relevant, together with your own contact details.

5. What will we do when a complaint is received?

- (a) We will acknowledge receipt of your complaint within 24 hours and work with you to resolve your complaint as best we can.
- (b) We will undertake a full investigation and assessment of your complaint taking into consideration all available information relating to your complaint. This may include consideration of information provided by you and information that is available in our records (as relevant).
- (c) If we resolve your complaint within 5 business days from the day you made your complaint, we will provide a written response where requested.
- (d) Where your complaint is resolved between 5 business days and 30 calendar days, we will provide you with a full written response to your complaint within 30 calendar days covering details of the outcome or if an outcome could not be determined within this timeframe, an update of the progress and reasons for the delay.
- (e) Any action required to resolve your complaint, will be completed as soon as possible to ensure all resolution outcomes are implemented in a timely manner.

6. Zero tolerance for rude, abusive behaviour

We understand that when providing a complaint, there may be heightened emotions of dissatisfaction or even anger. However, we have no tolerance for our team members being abused, threatened or belittled. As mentioned above, we take all complaints very seriously. It is beneficial for all if matters can be addressed in a courteous manner. We have a legal responsibility to provide a safe working environment for employees.

7. What if you are not satisfied with our response?

- (a) If you are dissatisfied with the way we handled your complaint, or dissatisfied with our response, you can contact an external complaint resolution scheme, who will investigate the matter on your behalf.
- (b) We are members of the Australian Financial Complaints Authority Limited (Membership Number 31285). AFCA provides consumers and small businesses with free, fair and independent dispute resolution for financial complaints. Their contact details are:

Australian Financial Complaints Authority Limited
GPO Box 3
Melbourne Victoria, 3001
Toll Free 1300 931 678
Fax (03) 9613 6399
Email info@afca.org.au
Website at www.afca.org.au



(c) Lodge an online complaint at: <https://www.afca.org.au/make-a-complaint/complain>