



Complaint Handling Policy

1. Purpose and background

Growthpoint Properties Australia (**Growthpoint**) is committed to conducting its business to the highest standard and a culture of corporate compliance, integrity and responsible and ethical behaviour.

Growthpoint Properties Australia Limited holds an Australian Financial Services Licence and is required by s.912A(1)(g)(i) and 912A(2)(a) of the Corporations Act to have internal dispute resolution procedures to manage complaints made in relation to the financial services provided by Growthpoint.

The complaints handling policy takes into account the elements of the complaint management framework set out in AS ISO 10002:2014 and the Group's obligations under the Corporations Act and ASIC Regulatory Guide 271 – Internal dispute resolution¹ (**RG 271**).

This policy applies to complaints made:

- in relation to the provision of any financial services or financial product by Growthpoint or a member of the Growthpoint Group, including complaints made by or on behalf of a security holder in a registered managed investment scheme which is managed by a member of the Growthpoint Group; and
- by individuals in relation to the handling of their personal information by a member of the Growthpoint Group (privacy complaints).

The purpose of this policy is to:

- ensure the prompt, effective and timely handling of such complaints; and
- outline the requirements and procedures for the handling, reporting and analysis of such complaints received to ensure a positive complaint management culture.

2. Policy application

All Growthpoint employees and directors must comply with this policy.

This policy deals with complaints by securityholders and privacy complaints. For all other types of complaints (e.g. complaints from tenants or service providers), the complaint will be handled by the relevant business unit in accordance with the principles of **section 6** of this policy, to the extent possible and appropriate. Significant issues or systemic issues² arising from these types of complaints will be reported to the Board.

3. What is a complaint?

AS ISO 10002:2014 defines a complaint as “An *expression of dissatisfaction* made to or about an organisation related to its products, services, staff or the handling of the complaint, where a response or resolution is explicitly or implicitly expected or legally required.”

A response or resolution is “implicitly expected” if the complainant raises the expression of dissatisfaction in a way that implies that the complainant reasonably expects Growthpoint to respond and/or take specific action.

¹ ASIC Regulatory Guide 165 Internal and external dispute resolution applies for complaints received before 5 October 2021.

² Regard will be had to RG 271 in determining whether there is a systemic issue.

An expression of dissatisfaction that meets the definition of a 'complaint' should not be categorised as 'feedback' or a 'comment', even if Growthpoint considers that the matter does not have merit.

For avoidance of doubt, the following is not considered a complaint:

- employment related complaints raised internally;
- requests for information;
- comments made about the Group where a response is not expected, such as:
 - feedback provided in surveys; or
 - reports intended solely to bring matters to the Group's attention.

4. How can a complaint be made?

Complaints can be made by a complainant directly or by their representative. Complaints can be made verbally or in writing and via phone, letter, facsimile, email or a post on a Growthpoint owned or controlled social media platform where the author is identifiable and contactable.

Growthpoint's Investor Relations team will monitor any complaints that are made on or through Growthpoint's social media assets (e.g. LinkedIn) or website.

If you are unsure as to whether the call/letter/social media communication you have received constitutes a 'complaint' for the purposes of this policy, please refer to the Compliance & Risk Manager or in his or her absence, the Company Secretary.

5. Complaints received by Computershare

Growthpoint has appointed Computershare to provide registry services and to act as a point of contact for securityholders to make inquiries or complaints in respect of their securityholding.

All registry related complaints received by Computershare from Growthpoint's securityholders will be handled by Computershare in the first instance and in accordance with procedures agreed with Growthpoint. All other complaints and registry complaints that are not resolved will be immediately forwarded by Computershare to the Compliance & Risk Manager or Company Secretary (together with supporting information and the outcome that the complainant is seeking) who will attempt to resolve the complaint in accordance with the steps set out in **section 12** below.

6. Dealing with the complaint

The procedures and steps to be followed in resolving a complaint are set out in **section 12** below.

Growthpoint is committed to attempting to resolve complaints in a timely and effective manner and as quickly as possible given the nature of the complaint.

All complainants must be treated with respect and all employees involved in the reporting or resolution of the complaint must approach the complainant in a fair, objective, user friendly and courteous manner, without actual or perceived bias. Employees dealing with the complaint should also proactively identify if the complainant may need additional assistance.

All employees must provide assistance and information required to resolve the complaint and implement any actions required to resolve the complaint and prevent future instances of similar complaints.

There may be times where a complainant displays unreasonable or challenging behaviour as they may be angry or frustrated with their situation. Growthpoint will not tolerate complaints that are abusive, threatening, unreasonable or vexatious or any unrealistic demands. In these sorts of scenarios, the matter should be escalated to the Company Secretary or his or her delegate for an appropriate response, which may include discontinuing contact with the complainant.

7. Reporting and monitoring

The Compliance & Risk Manager will promptly provide details of all complaints received to the Company Secretary and Managing Director.

Complaints data in the complaints register maintained will be analysed and monitored quarterly by the Compliance & Risk Manager to identify if there are any systemic issues identified through those complaints and the effectiveness of the internal complaints management procedures set out in this policy.

If the data shows there may be systemic issues, the Company Secretary will promptly arrange for an investigation to be undertaken and recommend any required corrective actions to prevent future occurrences to the Managing Director and the Audit, Risk and Compliance Committee. Identified systemic issues will also be promptly reported to the Board by the Company Secretary.

The Compliance & Risk Manager's quarterly compliance report to the ARCC will include details of the following:

- the number of complaints received and closed in the quarter;
- the circumstances and causes giving rise to complaints;
- the time taken to acknowledge and resolve complaints;
- the complaint outcomes, including the number of complaints resolved/unresolved/withdrawn, escalated to Australian Financial Complaints Authority (**AFCA**) (for complaints relating to financial services) or the Office of the Australian Information Commissioner (**OAIC**) (for privacy complaints) and any amounts paid or actions taken to resolve complaints; and
- possible systemic issues identified and trends and recommendations for improvements within the business.

The Compliance team will arrange for a compliance audit to be conducted annually to identify and address any issues of non-conformity with RG 271 and the requirements of this policy.

8. Responsibility

The Company Secretary has overall responsibility for the complaints management procedures set out in this policy.

9. Training

Training on this policy, the importance of escalating and resolving complaints in a timely manner and the complaints resolutions process will be provided to all staff.

10. Review

This policy, and the procedures to manage complaints, will be reviewed by the Compliance team and the Company Secretary annually to ensure that they are operating effectively and comply with ASIC policy, the Corporations Act and the Australian Standards for complaints handling, or earlier if there are any relevant regulatory or legislative changes.

11. Breach of this policy

Any breach of this policy must be reported to the Company Secretary and will be regarded as a serious matter and may result in disciplinary action.

12. Procedures to manage and resolve complaints

Process 1: Receiving the complaint

Responsibility	All employees at Growthpoint who receive a complaint
What	Obtain all relevant details about the complaint from the complainant, any supporting information and what outcome they are seeking. All complaints must then be referred to the Compliance & Risk Manager (or the Company Secretary in his or her absence).
How	Employees should tell the complainant that their complaint will be escalated to the Compliance & Risk Manager who will oversee the resolution of the complaint in accordance with Growthpoint's complaint handling procedures. Employees can request, but should not insist on, the complaint being put in writing.
When	Refer the complaint to the Compliance & Risk Manager (or the Company Secretary in his or her absence) immediately after the complaint has been received.
Why	To help Growthpoint assess and address the complaint.

Process 2: Send an acknowledgement letter

Responsibility	Compliance & Risk Manager (or the Company Secretary in his or her absence)
What	Promptly acknowledge receipt of the complaint to the complainant either verbally or in writing.
How	Growthpoint must acknowledge complaints either verbally or in writing (email, post or social media channels), having regard to the method used by the complainant to lodge their complaint and any preferences they may have expressed about communication methods.
When	Within 1 business day of receipt of the complaint or as soon as practicable.

Why To inform the complainant that their complaint has been received and to demonstrate that Growthpoint has a responsive complaint management process.

Process 3: Record and assess the complaint

Responsibility Compliance & Risk Manager (or the Company Secretary in his or her absence)

What All complaints must be assessed and recorded in the complaints register which is maintained by the Compliance team.

How The complaints register must include the identity of the complainant, the date the complaint was received, the nature of the complaint, the person handling the complaint, status of resolution of the complaint and any other relevant information.

The complaint will be assessed and prioritised according to the urgency and severity of the issues raised, with the assistance of the Company Secretary as required.

When As soon as practicable after the complaint is received or referred to the Compliance & Risk Manager (or the Company Secretary in his or her absence).

Why To track the progress of all complaints.

Process 4: Resolve the complaint

Responsibility Compliance & Risk Manager (or the Company Secretary in his or her absence)

What Attempt to resolve and close the complaint. If the complainant is not happy with the handling of their complaint or the attempted resolution is proving complex, it will be escalated to the Company Secretary who will assist with the resolution of the issue.

The complaint is deemed to be closed if Growthpoint has:

- a) resolved the complaint to the complainant's satisfaction, which is deemed to have occurred if:
 - i) confirmation (verbally or in writing) of the same has been received by the complainant; or
 - ii) circumstances exist that make it reasonable for Growthpoint to form the view that the complaint has been resolved to the complainant's satisfaction; or
- b) given the complainant an explanation and/or apology, when Growthpoint can take no further action to reasonably address the complaint.

If the complaint is closed by the end of the 5th business day after receipt of the complaint, Process 5 does not need to be undertaken unless:

- a) the complainant requests a written response; or
- b) the complaint is about hardship.

How In attempting to resolve the complaint, all Growthpoint staff must cooperate fully with any request for assistance or information from the Compliance & Risk Manager or the Company Secretary.

As part of attempting to resolve the complaint, adequate opportunity must be provided to the complainant to make their case and information about how Growthpoint manages its complaints under this policy should be provided on request to the complainant.

The Compliance & Risk Manager will obtain the approval of the Managing Director and Company Secretary if resolution involves the payment of a financial sum or by the Company Secretary from the Board if required by the Group's delegation of authorities policy.

When	The complaint will be attempted to be resolved as soon as possible. If the complaint is not resolved within the 5 th business day of receipt of the complaint, then a response letter or delay notification letter must be provided to the complainant (refer to Process 5 below).
Why	To attempt an early resolution and to protect Growthpoint's reputation as a quality service provider.

Process 5: Response to complainant or delay notification letter

Responsibility	Compliance & Risk Manager or Company Secretary														
What	A written response must be sent to the complainant, informing them of the outcome of their complaint (either confirmation of actions taken to resolve the complaint or reasons for rejection or partial rejection of the complaint).														
How	<p>The written response must include:</p> <ul style="list-style-type: none"> • the final outcome of their complaint, informing them of the outcome of their complaint (either confirmation of actions taken to resolve the complaint or reasons for rejection or partial rejection of the complaint); • must also include details of the avenues open to the complainant, should they not be satisfied with the outcome, namely their right to take the complaint to: <ul style="list-style-type: none"> i. Growthpoint's external complaints resolution body, AFCA for complaints relating to the Growthpoint Group's provision of financial services: <table border="0" style="margin-left: 20px;"> <tr> <td>Mail</td> <td>GPO Box 3, Melbourne Victoria 3001</td> </tr> <tr> <td>Phone</td> <td>1800 931 678 (free call)</td> </tr> <tr> <td>Email</td> <td>info@afca.org.au</td> </tr> <tr> <td>Website</td> <td>www.afca.org.au</td> </tr> </table> ii. the OAIC for complaints about the handling of personal information: <table border="0" style="margin-left: 20px;"> <tr> <td>Mail</td> <td>GPO Box 5218, Sydney, NSW 2001</td> </tr> <tr> <td>Phone</td> <td>1300 363 992</td> </tr> <tr> <td>Email</td> <td>enquiries@oaic.gov.au</td> </tr> </table> 	Mail	GPO Box 3, Melbourne Victoria 3001	Phone	1800 931 678 (free call)	Email	info@afca.org.au	Website	www.afca.org.au	Mail	GPO Box 5218, Sydney, NSW 2001	Phone	1300 363 992	Email	enquiries@oaic.gov.au
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If the complaint has been rejected or partially rejected, the response must set out **clear reasons** for the decision by identifying and addressing the issues raised in

the complaint, setting out Growthpoint’s findings on material questions of fact and referring to any information that supports those findings. The response must also provide enough detail for the complainant to understand the basis of the decision and to be fully informed when deciding whether to escalate the matter to AFCA or OAIC.

How The response letter must be reviewed and approved by the Company Secretary or the Managing Director.

When The response must be provided within 30 days of receipt of the complaint.

In the event that Growthpoint is unable to respond in time due to the complexity of the complaint or circumstances beyond its control are causing complaint management delays (e.g. information is being obtained from third parties), a “delay notification” letter must be provided to the complainant before the 30 day period that informs the complainant about:

- the reasons for the delay; and
- in the case of complaints relating to the Growthpoint Group’s provision of financial services, the right to complain to AFCA if dissatisfied and their contact details.

Why To ensure that there is a timely resolution of the complaint.

Process 6: Update the complaints register when a complaint is closed or escalated and implement any required actions

Responsibility Compliance & Risk Manager

What Record in the complaints register the complaint outcome, when it was closed or resolved, the complaint remedy and financial compensation amount (if any) and whether the complaint was escalated to AFCA or the OAIC.

Ensure that any agreed resolution outcomes or determination by AFCA or the OAIC are implemented in a timely manner.

When Promptly after the complaint is closed, resolved or escalated.

Why To ensure that records are kept and all required actions taken.

13. Policy approval date

This policy was approved on 23 August 2021 by Audit, Risk and Compliance Committee. It is effective from 5 October 2021 and replaces Growthpoint’s Complaint Handling Procedures from that date.