

Complaints Policy

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Licensee:

Astute Capital Management Pty Ltd
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Astute Capital Management is committed to providing quality advice to our clients. This commitment extends to providing accessible complaint resolution mechanisms for our clients. If you are not satisfied with our services, then we encourage you to contact us

1. Background & Purpose

The purpose of this policy is to provide Astute Capital Management, its customers, its Authorised Representatives, employees and officers with a clear and consistent understanding of the legislative requirements and our business requirements applicable to complaints management.

As a holder of an Australian Financial Services Licences (AFSL), we have obligations to comply with the regulatory requirements in relation to complaints management.

In order to meet our compliance obligations and to ensure that complaints are managed in an effective manner, our complaints management framework has been developed in accordance with our legislative and regulatory requirement and the recommendations in ASIC Regulatory Guide (RG) RG 271 Internal dispute resolution.

This policy has been developed to provide a framework for complaints management. The main objectives of this policy are to ensure that we have an effective complaints management framework in place to:

- **Acknowledge and record** complaints in a timely manner;
- **Assess and investigate complaints** to determine appropriate resolutions, which may include assessment of any appropriate compensation;
- **Monitor complaints** to track the progress of their resolution; and
- **Report complaints** to management, Responsible Managers, and the Astute Capital Management Board.

Astute Capital Management makes a firm commitment to each and every client to provide quality client service, research and advice and to ensuring we retain oversight of complaints received and to the efficient and effective resolution of complaints received in relation to financial product advice and services we offer. The complaints handling process forms an integral part of our Compliance Program.

2. How do we define a Complaint?

a. What is a Complaint

Astute Capital Management adopts the Australian Standard definition of a complaint, namely *“An expression of dissatisfaction made to Astute Capital Management, related to its products or services, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected.”*

b. Types of complaints

Complaints usually fall into two categories- service related or advice related. In either case the process to follow is the same.

- **Service-related complaints**

A service-related complaint is one where, you, the client, complains about the way the adviser conducts themselves or their business.

- **Advice related complaints**

An advice related complaint is one where you complain about the advice you have been provided which has caused you to suffer a financial disadvantage; you believe that the adviser has misled you about what to expect from the products; you complain that the Adviser have made an administrative error that has caused a financial loss or a complaint that the adviser has breached your privacy.

3. Who can make a complaint?

Complaints can be made by any person or third parties on behalf of customers, or directly to the Authorised Representative. Where a complaint is received from a third party, the adviser needs your consent to discuss with the third party unless it is clear that you have provided authority – for example where a complaint is lodged by a solicitor on your behalf or by another party (e.g., your new financial adviser) and you are copied into the complaint notification and we have verified that your contact details are correct. Best practice is to get your consent in writing but this is not mandatory. A verbal complaint carries as much weight as a written complaint.

4. Complaint notification and acknowledgement

Complaints should be lodged through the financial adviser, or through the following channels:

- Email | admin@astutecapital.com.au
- Phone | 0407 388 023
- Mail | Complaints Manager, Astute Capital Management, PO Box 399, Como WA 6952

To assist us in handling complaints in a timely and efficient manner we require the following information:

- Full name and contact details;
- Description of the issue;
- Provide all supporting documentation; and
- Clearly identify the resolution they are seeking.

Once received the complaint will be acknowledged within one business day. The acknowledgement will include:

- Contact details of Astute Capital Management;
- Overview of the complaints handling process; and
- Expected timeframes for response.

5. Client accessibility

Not all clients have strong English language skills. Where a suitable person is not available to support your complaint or you are unable to express your complaint, you will be referred to the Australian Government's Translating and Interpreting Service, at (<https://www.tisnational.gov.au/>)

Where you may have a disability, which makes expression of the complaint difficult, we will assist you where possible and encourage you to bring along a support person.

6. Complaints register

All complaints received will be registered in the Complaints Register which is the database used to store information relating to complaints. The Complaints Register also provides the functionality to track progress of your complaint.

7. Complaints Initial Review

Once a complaint has been received, we will assess it and priority will be given to those cases that are considered urgent and severe. Examples of matters to be prioritised include where:

- a) the complainant is experiencing domestic or financial abuse;
- b) the complainant has a serious or terminal illness; or
- c) a delay in addressing the complaint could adversely affect the complainant's basic living conditions.

8. Complaints assessment and investigation

Each complaint will undergo an investigation which will be managed by the Complaints Manager. The purpose of the investigation is to analyse the validity of the complaint, assess any potential liability and recommend an appropriate resolution.

The Internal Dispute Resolution process involves a review and assessment of the merits of the complaint against available information.

All complaints will be reviewed by the Director of Astute Capital Management.

9. How long should it take to get a response?

We will endeavour to resolve complaints within 5 business days. However, some complaints do take more time than others. If we anticipate that a complaint will take longer than 21 days to resolve, we will contact you within this time to provide an update on progress. Should it take longer than 30 days, we will contact you in writing to provide an explanation of the reason for the delay, and advise you that you may escalate the matter to the Australian Financial Complaints Authority (AFCA) if you are unhappy with the delay.

Included in our response letter will always be the details of who you should contact should you disagree with the resolution offered. We consider a complaint closed when:

- You accept the resolution offered and any required remediation activities have been completed (e.g., compensation paid); or
- When there is no further dispute or response from you for three months after the response letter was issued; or
- The complaint has been determined by AFCA and no further action is required from Astute Capital Management.

10. What happens if I am unhappy with the resolution?

If you do not feel that your complaint has been resolved in a satisfactory manner, or if a response has not been received after 30 days, a complaint can be lodged with the Australian Financial Complaints Authority (AFCA).

AFCA provides fair and independent financial services complaint resolution that is free to consumers. AFCA accepts complaints in regards to either:

- a financial planning or advice matter;
- a credit assistance matter; or
- a superannuation matters

We will provide in writing details of how to access AFCA to all complainants.

If you are not fully satisfied with our response to your complaint, you do have the right to take the complaint directly to AFCA. Contact details for AFCA are:

- Phone | 1800 931 678
- Online | www.afca.org.au
- Email | info@afca.org.au
- Mail | GPO Box 3, Melbourne, Victoria 3001

11. For more information

If you would like to find more information on this policy please contact Astute Capital Management by email at admin@astutecapital.com.au

12. Review

This policy will be reviewed at least biennially, or when changing circumstances warrant.