

Complaints Handling Policy

1. Policy Statement

Cromwell Funds Management Limited (Cromwell) is actively committed to handling complaints effectively and efficiently. We have a customer focused approach to our complaints handling process and support a positive complaints management culture.

This policy provides guidance to our clients on how we receive, manage and resolve complaints. All complaints are welcomed, valued and managed within our complaints handling process on a fair and unbiased basis.

The object of this policy is to ensure that:

- you are aware of how to lodge a complaint with us
- the options available to you if you need additional assistance to lodge a complaint
- the key steps in our complaint handling process
- our response timeframes
- how you can access the Australian Financial Complaints Authority (**AFCA**) if your complaint is not resolved or you are not satisfied with the decision we make.

2. Definition of a Complaint

A complaint is an expression of dissatisfaction made to or about Cromwell, related to its products or services, staff or the handling of a complaint, where a response or resolution to the complaint is explicitly or implicitly expected or legally required.

3. How to lodge a complaint

If you wish to make a complaint, Cromwell can be contacted via:

Cromwell's Investor Service Team contact details:

Address: 19/200 Mary Street, Brisbane QLD 4001, AUSTRALIA

Phone: 1300 268 078

Email: complaints@cromwell.com.au

Cromwell's Dispute Resolution Officer

Address: GPO Box 1093, Brisbane QLD 4001, AUSTRALIA

Email: compliance@cromwell.com.au

We will also respond to complaints made through other methods, including complaints made on social media, in person, or online.

We will accept a complaint made by a representative on your behalf. A representative includes a person who is your financial counsellor, legal representative, family member or friend.

4. Assistance making complaints

The person receiving or managing your complaint will give you any assistance you need to make the complaint to Cromwell. Please ask this person if you need additional assistance. If, after requesting assistance, for some reason you consider you need further assistance or the person receiving your complaint cannot assist you, please contact:

Cromwell Relationship Manager

Phone: 1300 268 078

Email: compliance@cromwell.com.au

5. How Cromwell deals with complaints

Acknowledgement

We will acknowledge your complaint within 24 hours (or one business day) of receiving it or as soon as practicable.

Review

We will review your complaint and may contact you to ask for additional information or documentation required to investigate your complaint.

Investigation

We will investigate your complaint in an equitable, objective and unbiased manner based on the information and documents you have provided us, any other available information and our own investigations into the complaint.

Response

Following our investigation, we will generally respond to your complaint in writing setting out:

- a) the final outcome of the complaint, including any actions we are taking to resolve the complaint and the basis of our decision
- b) the right to take the complaint to AFCA if you are not satisfied with our response; and
- c) the contact details for AFCA.

In some cases, we may respond to your complaint verbally where you are satisfied with our resolution or we cannot take any further action to reasonably address your complaint.

We may, at our discretion, resolve your complaint in a number of ways, including by providing:

- information and explanation regarding the circumstances giving rise to the complaint;
- an apology;
- compensation for loss incurred by you as a direct result of the breach (if any); and/or
- other such remedies as we consider appropriate.

Action

We will implement any actions set out in our response to your complaint.

6. Response timeframes

We will typically respond to your complaint within 30 calendar days of receiving the complaint unless:

- a) the complaint is complex; or
- b) there are circumstances beyond our control which are causing delays.

If we cannot respond to your complaint within 30 calendar days, we will notify you in writing.

7. Accessing AFCA

If you are dissatisfied with our decision for your complaint, you may refer the complaint to AFCA, an external, independent and impartial ombudsman service of which we are a member. It is free for you to refer your complaint to AFCA. You can contact AFCA using the details below:

Australian Financial Complaints Authority

Address: GPO Box 3, Melbourne VIC 3001, AUSTRALIA

Phone: 1800 931 678 (toll free)

Website: www.afca.org.au

Email: info@afca.org.au