

Complaints Handling Policy

1. Purpose

To set out Cromwell's commitment to meeting an effective and efficient complaints handling process (in line with ASIC's RG271), whilst adopting a customer focused approach that is fair and unbiased to each complainant.

All complaints are welcomed, valued, and managed within the guidelines of this Policy.

2. Policy Statement

Cromwell is committed to:

- A dispute resolution system that consists of:
 - an Internal Dispute Resolution (IDR) process that is accessible and easy to use for complainants and aligns with ASIC's Regulatory Guide 271; and
 - Maintain membership of an external dispute resolution scheme (EDRS). Cromwell Licensees are members of the Australian Financial Complaints Authority (AFCA) – membership numbers are:
 - Cromwell Funds Management Limited 14336;
 - Cromwell Property Securities Limited 10341; and
 - Cromwell Real Estate Partners Limited 87283.
- Actively respond to complaints received, online, by email, by phone or in person.
- Ensure the below timeframes are met for each complaint:
 - **Response acknowledgement** – Immediate, within 24 hours (or one business day) of receipt, or as soon as practicable
 - **5 day rule** – if response provided within 5 business days, no formal IDR response required unless the complainant requests a written response or complaint is about hardship
 - **Standard complaints response** – No later than 30 calendar days after receiving the complaint in accordance with ASIC RG 271.56
 - **IDR delay notification** – Required if the relevant maximum IDR timeframe is unable to be met, and prior to the 30th calendar day
- Establish consistence with IDR responses to include:
 - Issue raised – details of complaint
 - What we found - Brief description of assessment/investigation
 - The final outcome – our proposal to resolve issue
 - The right to take the complaint to AFCA if complainant is not satisfied with the IDR response
 - Contact details for AFCA
- Maintain an up-to-date record of complaints within the Complaints register.
- Continuously improving all aspects of our complaints handling processes and IDR system, having regard to relevant laws, industry standards and best practice.
- Ensure all employees (new and old) undergo annual training on Complaints Handling.

3. Contact details

To make a complaint, investors can contact Cromwell via email, phone or post:

Cromwell's Investor Service Team contact details:

Address: Level 10, 100 Creek Street, Brisbane QLD 4001, AUSTRALIA

Phone: 1300 268 078

Email: invest@cromwell.com.au

Cromwell's Dispute Resolution Officer

Address: GPO Box 1093, Brisbane QLD 4001, AUSTRALIA

Email: complaints@cromwell.com.au

If a retail investor is not satisfied with the resolution of their complaint or the services Cromwell has provided, they can access and lodge a complaint with AFCA:

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