



Ethical Investment Advisers Pty Ltd

AFSL: 276544

ABN: 26 108 175 819

*POLICY DOCUMENT*

# COMPLAINT HANDLING

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## **1. Background & Purpose**

The purpose of this policy is to provide Ethical Investment Advisers, 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 and Responsible Managers.

Ethical Investment Advisers make 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**

Ethical Investment Advisers adopts the Australian Standard definition of a complaint, namely *“An expression of dissatisfaction made to Ethical Investment Advisers, 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 has 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:

Phone: 07 3367 3332  
Email: [compliance@ethicalinvestment.com.au](mailto:compliance@ethicalinvestment.com.au) and mark as a 'Complaint' in the subject line  
Mail: PO Box 623 Paddington Qld 4064  
Face to face: At one of our business offices

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

- Full name and contact details;
- Investor/account number;
- Service/Product provider if complaint relates to a product;
- Authorised Representative's name;
- Description of the issue;
- Provide all supporting documentation; and
- Clearly identify the resolution they are seeking.

Once we receive your complaint, we will provide you with an acknowledgement in your preferred method of communication within 1 business day.

If you need assistance in expressing your complaint, then we are prepared to listen and help you to set out the details. We are also prepared to engage with a person that you may nominate to act on your behalf however we will require that authorised consent from you (unless they are acting under a Power of Attorney).

If you are more comfortable using a language other than English, please let us know so that an interpreter can be engaged.

## **5. Complaint assessment and investigation**

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

We will need to gather information from all parties involved in the complaint and consider that information in light of the situation you have brought to our attention; so, we may need to contact you during our assessment to clarify or obtain further information. Our promise is that we will always conduct investigations and assessments in a fair and unbiased manner.

You will receive our final response with clear explanations for our decisions.

Our final response will be provided to you within 30 calendar days of the receipt of the complaint. However, if your complaint is complex or there are unavoidable delays in receiving requested information from you this may impact our meeting that target. In those unexpected situations we will send you a Delay Notification which will set out the reasons for the delay and that you may escalate this to the Australian Financial Complaints Authority whose contact details are set out towards the end of this policy.

### **To reiterate our timeframes are:**

Acknowledgement of a complaint - 24 hours or 1 business day

Final response - 30 calendar days generally unless we issue a Delay Notification

## **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. What happens if you're 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 a 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
- superannuation matters

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](http://www.afca.org.au)  
Email: [info@afca.org.au](mailto:info@afca.org.au)  
Mail: GPO Box 3, Melbourne, Victoria 3001

**AFCA prefer that complaints be made online – view their website to arrange.**