
Internal Dispute Resolution Procedural Programme

Westlawn Financial Services Limited ACN 141 420 920 AFSL 518648

Responsible entity for:

Westlawn Income Fund ARSN 639 742 288

Version: 1

Adopted on: 29 June 2022

Table of contents

- 1 Background ----- 1**
- 2 Definitions----- 1**
- 3 Introduction----- 2**
 - 3.1 Aims of the IDR Programme 2
 - 3.2 Application of the IDR Programme 3
 - 3.3 Complaints Contact Person 3
- 4 What is a Complaint?----- 4**
- 5 The standards underpinning the IDR Programme ----- 4**
 - 5.1 Introduction 4
 - 5.2 Commitment 4
 - 5.3 Fairness and remedies/objectivity 5
 - 5.4 Resources 5
 - 5.5 Visibility 5
 - 5.6 Access and assistance 5
 - 5.7 Responsiveness 5
 - 5.8 Charges 5
 - 5.9 Legal assistance 6
 - 5.10 Liaison with Complainant 6
 - 5.11 Data collection, collection of information and confidentiality 6
 - 5.12 Analysis and evaluation of Complaints 6
 - 5.13 Accountability 6
 - 5.14 Reviews and continual improvement 6
- 6 The Complaints procedure----- 7**
 - 6.1 Introduction 7
 - 6.2 Step 1 – making a Complaint 7
 - 6.3 Step 2 – acknowledgement of Complaints 8
 - 6.4 Step 3 – dealing with the Complaint 9
 - 6.5 Step 4 – resolving the Complaint 9
 - 6.6 Step 5 – communicating and documenting resolution of the Complaint 10
 - 6.7 Step 6 – unresolved Complaints 11
 - 6.8 Step 7 – reviewing the Complaints process 11
- 7 Training-----12**

8	Authority and delegation -----	12
	Annexure A -----	14
	Specimen Form Letter – Acknowledging complaints	14
	Annexure B -----	16
	Specimen Form Letter - Communicating outcome	16
	Annexure C -----	19
	Specimen Form Letter - Delay Notification	19

Internal Dispute Resolution Procedural Programme

Westlawn Financial Services Limited ACN 141 420 920 AFSL 518648

1 Background

This is the IDR Programme for Westlawn Financial Services Limited. The Company is required to maintain an IDR Programme as a condition of its AFSL No. 518648. This document outlines:

- (a) the aims, rationale and principles underpinning the IDR Programme; and
- (b) the procedure by which the Company will resolve Complaints internally.

The IDR Programme will be administered by the Complaints Contact Person under supervision of Senior Management and the Directors. Regulatory Guide 271 issued by ASIC requires AFSL holders to have a complying IDR programme.

This IDR Programme is in compliance with Regulatory Guide 271.

2 Definitions

In this document:

Term	Definition
AFCA	means the Australian Financial Complaints Authority.
AFSL	means Australian Financial Services Licence.
ASIC	means the Australia Securities and Investments Commission.
AS/NZS ISO 10002-2014 or Standard	means Australian Standard – Customer Satisfaction – Guidelines for complaints handling in organisations (ISO 10002:2014).
Board	means board of directors of the Company.
Business Day	means a day that is not a Saturday, Sunday or public holiday in Sydney, New South Wales.
Company	means Westlawn Financial Services Limited ACN 141 420 920 and its authorised representatives.
Complainant	means the customer/client/investor/person who has made a Complaint to the Company.
Complaint	'expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required'.
Complaints Contact Person	means the person responsible for the management and review of this IDR Programme including: <ul style="list-style-type: none">(a) the maintenance of the Complaints Register;

Term	Definition
	<ul style="list-style-type: none"> (b) reporting to Senior Management as to the workings of this IDR Programme; and (c) (where practicable) the investigation, resolution and communication of all of Complaints received under this IDR Programme.
Complaints Register	means the register maintained by the Complaints Contact Person for the purposes of recording and detailing Complaints received in accordance with this IDR Programme. The Complaints Register should be inspected by Senior Management at least in conjunction with the Quarterly Report.
Directors	means the Board of Directors of the Company as constituted from time to time.
External Dispute Resolution	means the External Dispute Resolution service subscribed to by the Company, in this case, AFCA.
External Review	means a review undertaken by lawyers appointed by Senior Management to be conducted (at least) every five years.
Fund	means the Westlawn Income Fund ARSN 639 742 288.
IDR Programme	means this Internal Dispute Resolution Procedural Programme as adopted by the Company on 29 June 2022.
Independent Staff Member	has the meaning given to that term by section 6.4.
Internal Review	means a review conducted by Senior Management of the IDR Programme, conducted annually.
Quarterly Report	<p>means the report prepared by the Complaints Contact Person in accordance with this IDR Programme, which will:</p> <ul style="list-style-type: none"> (a) include metrics and analysis of Complaints (including systemic issues identified through those Complaints); and (b) be presented to Senior Management quarterly and ahead of the next most proximate quarterly Board meeting.
Senior Management	means the Managing Director, the Company Secretary and the Compliance Manager of the Company, acting separately or collectively, as determined or as delegated.

3 Introduction

3.1 Aims of the IDR Programme

The IDR Programme aims to facilitate the effective resolution of disputes. In so doing, the IDR Programme takes as its base standard the requirements outlined in ASIC Regulatory Guide 271 – *Internal dispute resolution*. These include:

- (a) commitment to the IDR Programme;
- (b) fairness and objectivity;

- (c) sufficient resources;
- (d) visibility and provision of information;
- (e) access, assistance and accessibility;
- (f) responsiveness to Complaints;
- (g) free of charge;
- (h) maintenance of confidentiality;
- (i) analysis and evaluation of Complaints;
- (j) management accountability;
- (k) continuing improvement and development;
- (l) a consumer-focussed approach.

3.2 Application of the IDR Programme

The IDR Programme applies to Complaints made by or on behalf of customers, clients, investors and members of schemes, advisors and authorised representatives covered by the Company's AFSL. If a Complaint is made under this IDR Programme, that Complaint will be handled based on the following general principles:

- (a) a recognition and respect of a Complainant's right to complain;
- (b) the Complainant's entitlement to a respectful and fair response;
- (c) the prompt resolution of the problem;
- (d) a mutual aim to fix problems for the benefit of both Complainants and the Company;
- (e) the importance of keeping Complainants informed throughout the process; and
- (f) Complaints will be dealt with under an overarching purpose of building a relationship with the Complainant and working to get things fixed; and
- (g) all information will be recorded with care.

3.3 Complaints Contact Person

Any Complaints should, in all instances, be referred to the Complaints Contact Person:

Stewart Purser
02 66420400
stewartp@westlawn.com.au
PO Box 78, Grafton NSW 2460

The Complaints Contact Person will resolve how the Complaint is to be dealt with in all instances unless written directions to the contrary are given by Senior Management or the Board.

4 What is a Complaint?

The IDR Programme adopts ASIC's definition of a Complaint, which, under RG 271, means an 'expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required'. ASIC has taken its definition from Australian Standard AS/NZS ISO 10002:2014 – *Quality management – Customer satisfaction – Guidelines for complaints handling in organisations*.

Therefore, the Company will consider any expression of dissatisfaction expressed to it as a Complaint. Examples of Complaints that may be received can include:

- (a) complaints in relation to the conduct of the Company's employees and representatives, including how the Fund has been promoted;
- (b) an investor not being satisfied with the level of their investment's performance;
- (c) complaints in relation to the terms and conditions of investing in the Fund;
- (d) concerns in relation to fees and charges, including the amount of any fee or charge and/or when it was charged and commissions;
- (e) not receiving a distribution cheque on time;
- (f) not having the change of contact details recorded correctly;
- (g) posts (that meet the definition of Complaint) on a social media channel or account owned or controlled by the Company that is the subject of the post, where the author is both identifiable and contactable;
- (h) a person continuing to receive marketing material when a request was made to not receive such material in the future, or for the details to be removed from any such mailing list; and
- (i) an investor not being satisfied with the way their personal information is being handled by the Company.

5 The standards underpinning the IDR Programme

5.1 Introduction

The guiding principles of AS/NZS ISO 10002-2014, as outlined in RG 271, must be adhered to when a Complaint is made to the Company. The requirements of the Standard are summarised below and, if inadequately summarised in this IDR Programme, the Standard will still nevertheless apply:

5.2 Commitment

As a general issue, the Company will be committed to its IDR Programme. This starts with Senior Management and filters down to all staff who should be aware of the relevant practices and procedures in the IDR Programme. Management systems and reporting procedures will be established to ensure timely and effective Complaints handling and monitoring.

5.3 Fairness and remedies/objectivity

When addressing Complaints, in an equitable, objective and unbiased manner, the Company will ensure that the IDR Programme allows adequate opportunity for all involved to make their case. Independent Staff Members will be appointed to review Complaints, rather than someone with whom the Complainant has previously dealt with. Where a resolution is reached, reasons should be given in writing, referring to applicable provisions in legislation, codes, standards or procedures.

5.4 Resources

It is the Company's obligation to ensure that the IDR Programme is adequately resourced to ensure there are no undue delays in processing and handling Complaints. This includes ensuring staff are adequately trained in the IDR Programme and that appropriate documentation, specialist support, materials, equipment, computer hardware, software and finances are also available to the IDR Programme. Note that the Complaints Contact Person under supervision of Senior Management will manage and oversee the IDR Programme, ensuring adequate resources are provided.

5.5 Visibility

The Company should ensure that all information relating to the IDR Programme is readily available, including having it available on the Company's website and referenced in documentation, as required by law, (i.e. product disclosure statements and financial services guides). The information should detail how a Complaint may be made and the resolution process. All staff should understand the IDR Programme so as to answer any questions from people about making a Complaint.

5.6 Access and assistance

The IDR Programme is designed to provide simple and accessible arrangements for making Complaints. It includes allowing Complaints to be made in writing, via email, via telephone, or in person. The IDR Programme also ensures that potential Complainants with a disability or limited literacy skills have the ability to make a Complaint. A toll-free number should also be made available for the making of Complaints.

All information relating to the resolution of Complaints and the IDR Programme is to be in plain and accessible English.

5.7 Responsiveness

The IDR Programme is intended to ensure the efficient and effective resolution of disputes. This means that Complainants should have their Complaint acknowledged immediately, and the Complaint should be resolved in no more than **30 calendar days**. Where this is not possible, the Complainant should be notified that there will be a delay and should, if they are not prepared to accommodate that delay, be invited to pursue External Dispute Resolution, if they wish.

In resolving a dispute, the Company should accept the Complaint could be quite valid and offer redress.

5.8 Charges

No fee should be charged to a Complainant under the IDR Programme.

5.9 Legal assistance

It is to be expected that some Complainants may engage a lawyer to help them articulate their Complaint and to provide supporting submissions. No objectives are to be raised simply because a Complaint is made by a Complainant's lawyers. Complaints made by a Complainant's lawyers are to be treated the same way as if made by the Complainant.

5.10 Liaison with Complainant

The Company will help the Complainant articulate their Complaint and encourage them to provide as much information as possible to explain their Complaint. The Complainant should be told (via telephone conversations, if possible) of what information is needed in order to allow the Company to properly consider the Complaint. In some cases, for example, this might mean that the Complainant needs to explain how losses claimed are calculated or even to provide evidence of any losses claimed. Telephone conversations with Complainants may need to be followed up by email, fax or letter if information requested from the Complainant has not been provided within a week of a telephone call. In all cases, notes should be made of telephone conversations with Complainants.

5.11 Data collection, collection of information and confidentiality

There will be an effective system in place to record the information relating to Complaints. This system should ensure that all information relating to a Complainant's Complaint is kept confidential. There will be appropriate mechanisms for identifying, gathering, maintaining, storing and disposing of records, established by Senior Management. All data should be maintained, as a useful tool in tracking compliance issues and risks.

Information that is personally identifiable relating to a Complaint should not be disclosed unless needed for the purposes of addressing the Complaint. The only way that disclosure of this information can be made is if the Complainant expressly consents.

5.12 Analysis and evaluation of Complaints

The Company will analyse and process the Complaints that were received and their resolutions. This information will be used to ensure that the Company picks up systemic, recurring problems and trends, as well as resolving single incidents. This will assist the Company in eradicating the underlying causes of Complaints.

5.13 Accountability

Senior Management will maintain an overarching supervision of the IDR Programme. This means reports about Complaints should be prepared for Senior Management and the Board, including the nature of the Complaint and the actions and decisions progressively taken to resolve that Complaint. These reports should be maintained in the Company's records for production to ASIC, if necessary.

5.14 Reviews and continual improvement

The IDR Programme will be constantly subject to internal review and improvement. The Company encourages staff to escalate possible systemic issues they identify from Complaints. ASIC considers that reviews should be considered at least every two to three years to ensure the system is operating effectively and that Complaints are being acted on and resolved. Periodically, it may even be beneficial to have the IDR Programme externally reviewed (every 5 years).

6 The Complaints procedure

6.1 Introduction

This section outlines the procedure that will be undertaken to resolve a Complaint under the Company's IDR Programme. The procedure comprises the following steps:

- (a) making a Complaint;
- (b) acknowledgement of receipt of Complaint;
- (c) dealing with the Complaint;
- (d) determining the likely outcome of the Complaint and negotiating a resolution with the Complainant;
- (e) notifying the Complainant of the decision and seeking the Complainant's acceptance;
- (f) review of the Complaint process;
- (g) monitoring the Complaints Register.

6.2 Step 1 – making a Complaint

Complaints may be made by customers/clients, investors/advisers (**the Complainant**) in the following ways, by way of example:

- (a) to the Complaints Contact Person – Mr Stewart Purser, in any of the following forms:
 - (i) by telephone – 02 66420400
 - (ii) by written letter – PO Box 78, Grafton NSW 2460;
 - (iii) by facsimile – 02 66420474; or
 - (iv) by email - stewartp@westlawn.com.au ,
- (b) to individual staff members (with whom the Complainant has had dealings), in any of the following forms:
 - (i) by telephone;
 - (ii) by written letter;
 - (iii) by facsimile; or
 - (iv) by email,
- (c) to the Company generally, in any of the following forms:
 - (i) by telephone;
 - (ii) by written letter;
 - (iii) by facsimile;

- (iv) by email; or
- (v) by social media channels operated by the Company.

Where a Complaint is received verbally, the person receiving the Complaint should:

- (a) record the particulars of the Complainant;
- (b) record the relevant facts relating to the Complaint;
- (c) if not received by the Complaints Contact Person, advise the Complainant that the Complaint will be referred to the Complaints Contact Person; and
- (d) advise the Complainant that they will receive acknowledgement of their Complaint from the Complaints Contact Person within one Business Day of receiving it, or as soon as practicable.

Where a Complaint is received verbally, the person receiving the Complaint should not:

- (a) attempt to resolve the Complaint over the telephone;
- (b) be defensive, argumentative, derogatory or offensive; and
- (c) discuss with the Complainant any matter which would be contradictory to this IDR Programme, including discussing confidential information.

6.3 Step 2 – acknowledgement of Complaints

The Company must write to the Complainant within **one Business Day** of receipt of the Complaint, or as soon as practicable. The written notification must contain:

- (a) acknowledgement that the Complaint has been received;
- (b) a description of the process which the Complaint will then be subject to (including further notifications and relevant time frames for resolution of the Complaint);
- (c) the relevant contact details of the Complaints Contact Person;
- (d) the relevant contact details of the person(s) investigating the Complaint;
- (e) acknowledgement that the Complainant's details and the Complaint will be dealt with confidentially and only by the persons specified in the acknowledgement will have access to such information. The following paragraph should be inserted:

'If you feel there is an issue relating to your privacy, which remains unresolved, or you wish for the Australian Information Commissioner to further investigate your Complaint, you can contact the Office of the Australian Information Commissioner as detailed below:

Office of the Australian Information Commissioner

*GPO Box 5218
SYDNEY NSW 2001*

*Telephone: 1300 363 992
Internet: www.oaic.gov.au*

- (f) an undertaking that no fee will be charged for the resolution of the Complaint;

- (g) any remedies that may be available to the Complainant; and
- (h) a reference to the Company's External Dispute Resolution service and that the Complainant may refer the dispute to this service at any time, if they are not satisfied that it is being dealt with appropriately. This should be done by inserting the following paragraph:

'The Company is a member of an independent dispute resolution scheme, the Australian Financial Complaints Authority (AFCA). If, at any time, you feel your Complaint remains unresolved or you wish AFCA to further investigate your Complaint, you can contact AFCA as detailed below:

Australian Financial Complaints Authority

GPO Box 3
MELBOURNE VIC 3001

Telephone: 1800 931 678
Facsimile: (03) 9613 6399
Internet: <http://www.afca.org.au>
Email: info@afca.org.au

The acknowledgement must be in writing and may be sent to the Complainant through any of the following means:

- (a) by written letter;
- (b) by facsimile;
- (c) by email; or
- (d) by social media channels.

Annexure A is a Specimen Form Letter for acknowledgement of receipt of a Complaint, which is intended to provide guidance.

6.4 Step 3 – dealing with the Complaint

All Complaints (whether received verbally or in writing) should be referred to the Complaints Contact Person who should:

- (a) record the Complaint in the Complaints Register;
- (b) acknowledge receipt of the Complaint in accordance with section 6.3 of this IDR Programme;
- (c) investigate the Complaint either personally, or refer the investigation to a staff member who has had appropriate training in dispute resolution and has not previously had contact with the Complainant (**Independent Staff Member**); and
- (d) where the Complaints Contact Person is not investigating and resolving the Complaint, they must supervise the ongoing investigation and resolution of the Complaint.

6.5 Step 4 – resolving the Complaint

The Complaints Contact Person, or Independent Staff Member should investigate the Complaint. This will involve (where necessary):

- (a) giving all parties an opportunity to present their case (including the Complainant and all relevant staff members);
- (b) talking to relevant staff members (who may have further facts relating to the Complaint);
- (c) clarify any factual issues with the Complainant (this may be done either in writing or verbally – in person or by telephone);
- (d) formulate a report to be included in the Complaints Register and provided to the head of the department/division of the Company, who forms the basis for the Complaint. This report should detail all relevant facts and information relating to the Complaint and the steps taken to resolve the Complaint including a negotiation strategy for resolving the Complaint; and
- (e) attempt to resolve the Complaint, liaising where necessary with Senior Management.

Throughout the resolution process, the confidentiality of all persons must be maintained and only Senior Management, the Complaints Contact Person and the Independent Staff Member should have access to confidential information. The person designated as Independent Staff Member is expected to be a person to whom the Complaints Contact Person can refer Complaints for processing.

Annexure B comprises a Specimen Form Letter which can be used as guidance. This version presupposes that an offer is made to the Complainant as a means of procuring resolution of the Complaint.

6.6 Step 5 – communicating and documenting resolution of the Complaint

A resolution should be determined and communicated to the Complainant within **30 calendar days** of receipt of the Complaint (**Response Timeframe**). In the event the Company closes a Complaint within five Business Days of receipt, the Company must provide a written response if the Complainant so requests. The Company is not required to provide a response within the Response Timeframe:

- (a) where there is no reasonable opportunity for the Company to provide a response because:
 - (i) resolution of the individual complaint is particularly complex; and/or
 - (ii) circumstances beyond the Company's control are causing complaint management delays; and
- (b) the Company provides the Complainant with a resolution delay notification, before the Response Time frame expires, containing the following information:
 - (i) the reasons for the delay;
 - (ii) their right to complain to AFCA if they are dissatisfied; and
 - (iii) the contact details,

(Delay Notification).

Annexure C is a Specimen Form Letter for a Delay Notification, which is intended to provide guidance.

Depending on the authority of the Complaints Contact Person and the nature of the resolution proposed, Senior Management may need to approve the means of resolving the Complaint before any offer is put to the Complainant.

Once a resolution is reached, the Complaints Contact Person should:

- (c) in writing, notify the Complainant of the result of the Complaint, which as a minimum should include:
 - (i) the details of the resolution of the Complaint;
 - (ii) the reasons for the decision made;
 - (iii) any remedies or redress available to the Complainant; and
 - (iv) a referral to the Company's External Dispute Resolution service (as discussed at section 6.3(h)) should the Complainant be unsatisfied with the resolution of the Complaint,
- (d) prepare a final report to be recorded in the Complaints Register;
- (e) notify the relevant department/division of the result of the Complaint and suggest any action that can or should be taken to avoid similar Complaints in the future; and
- (f) notify Senior Management of the Complaint's resolution or the outcome.

6.7 Step 6 – unresolved Complaints

Where a Complaint remains unresolved (but recognising that a decision has been made), after 30 calendar days of receipt of the Complaint, the Complaints Contact Person should refer the Complaint to Senior Management. Note that the Complainant should have received notice in accordance with section 6.6.

6.8 Step 7 – reviewing the Complaints process

The Complaints Contact Person must maintain a Complaints Register which must record details of all Complaints received, it should, at a minimum:

- (a) categorise Complaints and group them under relevant headings (to facilitate review);
- (b) record all particulars of the Complainant;
- (c) provide all information relevant to the Complaint from both the Complainant and the relevant staff/department/division;
- (d) include copies of all correspondence relating to the Complaint (including all emails, letters and facsimiles sent and received and file notes detailing particulars of conferences, telephone calls, meetings and actions); and
- (e) any reports prepared by the Complaints Contact Person, or relevant investigating staff member (including any reports made to Senior Management).

The Complaints Contact Person is responsible for the maintenance and currency of the Complaints Register and should conduct a monthly audit of the Complaints Register.

The Complaints Contact Person should prepare a Quarterly Report to Senior Management and the Directors. The report should disclose:

- (a) all Complaints received by the Company for that quarter;
- (b) the details of the resolution of those Complaints;
- (c) the number of Complaints outstanding and proposed timeframes and progress reports;
- (d) recommendations to the Company which seek to address issues discovered through the investigation and resolution of Complaints; and
- (e) recommendations relating to the improvement of the IDR Programme,

Senior Management and the Board should review the Quarterly Reports and amend the Company's practices and the IDR Programme as they deem necessary. The Company will also report on Complaints in its annual report.

(internal review) This IDR Programme will be subjected to an annual Internal Review by Senior Management. This Internal Review should be a comprehensive review of the IDR Programme, measuring its effectiveness against the relevant ASIC benchmarks and other law and policy and taking into account any changes in the Company's business.

(external review) This IDR Programme will be subject to an External Review, to be conducted by lawyers appointed by Senior Management, held at least every five years.

7 Training

Senior Management will ensure that the Complaints Contact Person (and appropriate staff to whom Complaints are referred) are appropriately skilled and trained when appointed to their positions and that they are given the opportunity and incentive, at least twice per annum, to attend training sessions or programmes to update their existing skills in dispute resolution, decision making, customer communication, or on such other courses as they or Senior Management believe are appropriate.

8 Authority and delegation

The IDR Programme relies upon there being delegations in place from the Board to the person holding the position of Complaints Contact Person, to Senior Management and to any Independent Staff Member or designated complaints officer to be empowered to act in accordance with the IDR Programme and to have the authority to:

- (a) resolve Complaints by making offers of monetary or other compensation to Complainants to satisfy their Complaints;
- (b) negotiate the settlement of Complaints by entering into binding agreements with Complainants;
- (c) commit Company resources to the settlement of Complaints or towards the dealing with Complaints;
- (d) to make apologies to Complainants; and
- (e) to do all such other acts and things as may be necessary or incidental to the above.

It is recognised that any delegations which issue may be subject to monetary limits in so far as the Company's authority given to any person in the exercise of the powers or functions under paragraphs (a) to (e) above may be restricted by limiting the amount of any expenditure to which the Company may be committed.

It will be incumbent upon each person authorised to resolve Complaints to ensure they act within the financial constraints of their authorised delegation and to consult with Senior Management in the case of uncertainty.

Annexure A

Specimen Form Letter – Acknowledging complaints

[Letterhead of Westlawn Financial Services Limited]

Mr/Ms [#insert name of Complainant]
[#insert Complainant's address]

Dear Mr/Ms [#insert name of Complainant]

Your recent Complaint

By [#letter/telephone/call/email/fax] received on [#insert date], you provided us with information which we are treating as a complaint and which will be handled in accordance with our Internal Dispute Resolution Programme. Apart from the information you provided to us when making your Complaint, we invite you now to provide us with any other information which you think would be useful or helpful in resolving your Complaint. If there is any information of this kind, would you please send it to [#me/name of designated complaints officer] in the next seven days. I will then review your written Complaint in detail or alternatively, assign your Complaint to one of our Complaints Officers to review and investigate your Complaint in detail.

I anticipate that a decision on your Complaint will be conveyed to you by 5.00pm [30 calendar days from receipt of the Complaint].

So far as is practical, the investigation will involve enquiries being made within our Company and the checking of circumstances you have mentioned against records we have or based on recollections of our staff with whom you have had contact.

If you feel there is an issue relating to your privacy, which remains unresolved, or you wish the Australian Information Commissioner to further investigate your Complaint, you can contact the Office of the Australian Information Commissioner as detailed below:

Office of the Australian Information Commissioner

GPO Box 5218
SYDNEY NSW 2001

Telephone: 1300 363 992
Internet: www.oaic.gov.au

The Company is a member of an independent dispute resolution scheme, the Australian Financial Complaints Authority (**AFCA**). If, at any time, you feel your Complaint remains unresolved or you wish AFCA to further investigate your Complaint, you can contact AFCA as detailed below:

Australian Financial Complaints Authority

GPO Box 3
MELBOURNE VIC 3001

Other contact details are:

Telephone: 1800 931 678
Facsimile: (03) 9613 6399
Internet: <https://www.afca.org.au/>
Email: info@afca.org.au

Yours sincerely

[#insert name of Complaints Contact Person]
[#insert position of Complaints Contact Person]

Date: [#insert]

Contact details

Complaints Contact Person:	Phone:	[#insert]
	Email:	[#insert]
	Fax:	[#insert]
Designated Complaints Officer:	Phone:	[#insert]
	Email:	[#insert]
	Fax:	[#insert]

Annexure B

Specimen Form Letter - Communicating outcome

[Letterhead of Westlawn Financial Services Limited]

Mr/Ms [#insert name of Complainant]
[#insert Complainant's address]

Dear Mr/Ms [#insert name of Complainant]

Your recent Complaint

On [#insert date], you made a Complaint which was subsequently acknowledged as received by us and which has been looked into by me.

#Note: where the Company rejects or partially rejects a Complaint, this letter must contain 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 another forum. The level of detail should reflect the complexity of the Complaint.

#Optional text: if the Complaint is rejected or partially rejected, the Company must identify and address the issues raised in the Complaint.

In your Complaint you:

- (a) [#insert]
- (b) [#insert]

#Optional text

I have made the following findings relevant to your Complaint:

- (c) [#insert] Where the Complaint has been rejected or partially rejected, the Company must set out its findings on material questions of fact referring to the information that supports those findings]
- (d) [#insert]

#Optional text

I have concluded, based on my enquiries and review of relevant material that your Complaint [#is substantially justified] or [#is not recognised as justifying any remedial action on our part].

#Optional text

I have therefore concluded that our Company should address your Complaint by doing these things:

(a) [#insert]

(b) [#insert]

If the Company does these things, your Complaint will be regarded as having been fully dealt with and you will have no further claims against the Company in respect of your Complaint.

or

I have therefore concluded that no action on our Company's part is warranted.

My reasons for this conclusion are:

(a) [#insert reasons]

(b) [#insert reasons]

If you are not satisfied with this outcome or decision, you may refer a copy of your Complaint and the supporting material to:

Australian Financial Complaints Authority

GPO Box 3
MELBOURNE VIC 3001

Other contact details are:

Telephone: 1800 931 678
Facsimile: (03) 9613 6399
Internet: <https://www.afca.org.au/>
Email: info@afca.org.au

I would appreciate it if you could let me know by 5.00pm [#insert response] if the decision I have made satisfactorily resolves your issues.

Yours sincerely

[#insert name of Complaints Contact Person]

[#insert position of Complaints Contact Person]

Date: [#insert]

Contact details

Complaints Contact Person: Phone: [#insert]

Email: [#insert]

Designated Complaints Officer: Fax: [#insert]
Phone: [#insert]
Email: [#insert]
Fax: [#insert]

Annexure C

Specimen Form Letter - Delay Notification

[Letterhead of Westlawn Financial Services Limited]

Mr/Ms [#insert name of Complainant]
[#insert Complainant's address]

Dear Mr/Ms [#insert name of Complainant]

Your recent Complaint

On [#insert date], you made a Complaint which was subsequently acknowledged as received by us.

We confirm we are progressing the resolution of your Complaint; however, we are experiencing delays due to the following reasons:

- (a) [#insert]
- (b) [#insert]

If you are not satisfied with this explanation, you may refer a copy of your Complaint and the supporting material to:

Australian Financial Complaints Authority
GPO Box 3
MELBOURNE VIC 3001

Other contact details are:

Telephone: 1800 931 678
Facsimile: (03) 9613 6399
Internet: <https://www.afca.org.au/>
Email: info@afca.org.au

We appreciate your patience and understanding while we progress the resolution of your Complaint.

Yours sincerely

[#insert name of Complaints Contact Person]
[#insert position of Complaints Contact Person]

Date: [#insert]

Contact details

Complaints Contact Person:	Phone:	[#insert]
	Email:	[#insert]
	Fax:	[#insert]
Designated Complaints Officer:	Phone:	[#insert]
	Email:	[#insert]
	Fax:	[#insert]