

**COMPLAINTS  
HANDLING - External  
Statement for Retail  
Clients**

**Responsible Investment Services  
Pty Ltd  
ABN 77 630 578 200**

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# 1 General

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## 1.1 Document overview

This document describes Responsible Investment Services (RIS), in its capacity as promoter of Slate Super, Complaints Handling principles and the adopted framework for the effective management of complaints received from retail clients about its services. Any complaints received in relation to decisions made about a client's interest in Slate Super will in most, if not all, cases need to be handled under Slate Super's trustee's complaints handling policies and procedures.

## 1.2 Introduction

RIS has put in place an Internal Dispute Resolution (**IDR**) framework to deal with any complaints received from retail clients about services RIS provides them.

*Complaints from Slate Super members about decisions made about their superannuation holding are unlikely to fall within the remit of RIS's framework. If RIS receives complaints from Slate Super members it will pass them on to Diversa, as the trustee of the fund, to handle under its IDR framework.*

RIS's IDR framework as summarised in this document has been developed having regard to the ASIC's Regulatory Guide 271 *Internal Dispute Resolution* and Australian Standard– *Guidelines for Complaint Management in organizations (AS/NZS 10002:2014)*

RIS's IDR framework must be followed by all RIS staff, its service providers and agents that act for, or on behalf of, RIS.

# 2 Complaints Handling Principles

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## 2.1 IDR standards

In accordance with RG 271 and AS/NZS 10002-2014, RIS's complaint handling procedure should reflect the following standards :

- (a) Commitment and culture
  - (i) commitment to the process from senior management level; and
  - (ii) openness to receiving complaints and demonstrate a commitment to resolving complaints through action.
- (b) Enabling complaints
  - (i) visibility of how and where complaints can be made (internally/ externally);
  - (ii) access and assistance are available to all customers; and
  - (iii) no fees (charges) applied for complaint resolution.
- (c) Resourcing
  - (i) adequate resources allocated to complaint resolution; and
  - (ii) all staff understand their roles and responsibilities in relation to the IDR process and be regularly trained.
- (d) Responsiveness

- (i) prioritise complaints according to the urgency and severity of the issues raised;
  - (ii) be customer-focussed approach to resolving complaints;
  - (iii) acknowledge complaints in accordance with the requirements;
  - (iv) adopt a range of flexible complaint management approaches that promote early resolution;
  - (v) have a broad range of appropriate remedies available;
  - (vi) issue IDR responses within maximum IDR timeframes; and
  - (vii) implement complaint resolution outcomes in a timely manner.
- (e) Objectivity and fairness
- (i) demonstrate of fairness, independence, objectivity and have an equitable manner in how complaints are addressed; and
  - (ii) protect complainants' confidentiality.
- (f) Policy and procedures
- (i) readily available public complaints policy;
  - (ii) documented internal complaint management procedure; and
  - (iii) regular review the adequacy of complaint management documentation, including the complaints policy and internal procedure.
- (g) Data collection, analysis and internal reporting
- (i) record all complaints received; and
  - (ii) analyse complaint data regularly and provide reports to senior management and the firm's board.
- (h) Continuous improvement
- (i) monitor and review the performance of the IDR process;
  - (ii) identify and address systemic and recurring problems; and
  - (iii) conduct regular compliance audits to identify and address issues of non-conformity with RG271 and internal requirements.

## **2.2 Requirements for a complaint handling procedure**

RIS's complaint handling procedure should address the following requirements :

- (a) the definition of 'complaint' and the types of matters that must be dealt with in accordance with the IDR requirements;
- (b) proactively identifying and assisting complainants who might need additional assistance;
- (c) acknowledging complaints;
- (d) assessing and prioritising complaints according to the urgency of the issues raised;
- (e) dealing with unreasonable complainant conduct;

- (f) investigating complaints, conducting negotiations and exploring resolution options, including appropriate remedies;
- (g) providing an IDR response within maximum IDR timeframes;
- (h) the content of IDR responses, including reasons for decision;
- (i) closing complaints;
- (j) identifying and escalating systemic issues and complaint trends; and
- (k) reporting internally about complaints.

### **2.3 Complaints handling principles**

Throughout the complaint handling process, RIS is committed to the following principles:

**(a) to act fairly and reasonably:**

- (i) listen to the complainant's concerns;
- (ii) be efficient and fair;
- (iii) only ask for and take into account relevant information when resolving a complaint;
- (iv) where an error or mistake in handling the investor's complaint is identified, RIS will recognise this and immediately initiate action to correct it;
- (v) give the complainant adequate opportunity to make their case;
- (vi) when relevant, provide information on the progress of the complaint; and
- (vii) in the case where the complainant is not satisfied with the proposed resolution, provide details of the EDR scheme.

**(b) to act consistently and ethically:**

- (i) all complaints must be treated as legitimate and investigated without prejudice;
- (ii) confirm the agreed resolution and, where requested/required, provide the complainant with a copy of the agreement/documentated resolution; and
- (iii) strive to resolve complaints in a consistent manner.

**(c) to inform complainants of External Dispute Resolution (EDR) body:**

- (i) notify retail clients in the FSG of access rights and contact details of EDR, which is AFCA; and
- (ii) in the case where the complainant is not satisfied with the proposed complaint resolution, RIS will inform the complainant of the details of AFCA.

## **3 Complaints Handling Procedure**

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### **3.1 Procedure overview**

The IDR procedure comprises the following steps:

- (a) Lodging a complaint – the point of entry
- (b) Receiving a complaint – how RIS becomes aware of a complaint
- (c) Recording a complaint – the first step to managing and resolving a complaint
- (d) Managing a complaint – the necessary steps to resolve a complaint
- (e) Written resolution of a complaint – how to deal with a resolved complaint
- (f) Escalation – how to deal with an unresolved complaint
- (g) Referral to an EDR – how to deal with a complaint that cannot be resolved internally or within the given timeframe

The following sections describe each of these steps in detail.

### 3.2 Lodging a complaint

The following table provides information on how a complainant can lodge a complaint directly with RIS:

How	Details
Telephone	(02) 8074 1772
Writing	1 Munn St Millers Point NSW 2000 Australia
Email	<a href="mailto:info@slatesuper.com.au">info@slatesuper.com.au</a>

A complaint may also be made on social media where the person making the complaint is both identifiable and contactable. This could include any account RIS may hold with LinkedIn, Twitter, Facebook or Instagram pages. Where a negative review is left on Google that is brought to RIS's attention, RIS will make an attempt to identify and contact the person making the complaint.

### 3.3 Procedure for receiving complaints

All sources of complaints received must be communicated to the Complaints Officer immediately, especially if they are not able to be resolved straight away. The Complaints Officer should be notified within seven business days of complaints that were resolved straight away.

All complaints will be logged in the Complaints Register.

### 3.4 Handling complaints

RIS will make a decision on a client's complaint within 30 days of receipt. However, in some cases, RIS may request more time from the complainant to complete the investigation before making a decision.

### 3.5 Escalation Process

In case there is no resolution of the Complaint within 30 days, or if the Complainant wishes to do so, the complaint can be referred to AFCA.

RIS is required to advise the complainant or third party of the services of AFCA.

### 3.6 EDR Contact details

Contact details for AFCA:

**Australian Financial Complaints Authority (AFCA)**

GPO Box 3

Melbourne Vic 3001

Telephone: 1800 931 678 (between 9:00am and 5:00pm AEST)

URL: [www.afca.org.au](http://www.afca.org.au)

Email: [info@afca.org.au](mailto:info@afca.org.au)