

Internal Dispute Resolution Policy

SR Group Debt Management Pty Ltd

ABN 88 612 445 637

AFCA Membership [_____]

Suite 518, 165-167 Phillip Street Sydney NSW 2000
Telephone 02 8304 9300 | Email info@srgroup.com.au

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1 Background

SRG Debt Management Pty Ltd (SRG) maintain an internal dispute resolution policy, which purpose is to help manage disputes within SRG. This policy includes a procedure which covers complaints made by clients and other parties in relation to services provided and covers complaints made by clients and other parties in relation to the conduct of SRG's staff.

In following this policy, SRG complies with obligations imposed and/or recommended in accordance with the Australian Securities and Investments Commission's Regulatory Guide 165 (RG165).

It is acknowledged that even if SRG is not bound by RG165 or the legislation in respect of it, it is satisfied to be the author of this policy and comply with the terms of this policy.

2 Purpose

2.1 Why is this policy in place?

SRG operates and maintains this policy and the procedures within it to ensure its staff are able to:

- (a) Resolve complaints quickly and directly thereby prevents complaints from becoming entrenched, preserving relationships and providing an efficient, fair and effective method for handling complaints;
- (b) Identify and address recurring or systemic problems;
- (c) Provide solutions to problems rather than have remedies imposed by an external body; and
- (d) Improve and/or promote the level of confidence and satisfaction of SRG with both clients and third parties.

SRG will conduct regular ongoing reviews of this policy and its dispute resolution procedure, and amend it where required.

2.2 Definition

For the purposes of this policy, "complaint" means:

"An expression of dissatisfaction made to an organisation, related to its products or services, or the complaints handling process itself, where a response or resolution is explicitly or implicitly implied."

SRG extends this definition by breaking it into two categories:

- (a) Complaint as an expression of dissatisfaction raised by a client, third party, official or member of staff which relates to the services provided by SRG;
- (b) dispute as an expression of dissatisfaction raised by a client, third party, official or member of staff which relates to conduct of staff not specifically related to services.

2.3 Resources

The SRG board will be responsible for making complaint determinations and to continue to support its objectivity and independence by requiring that any director against whom a complaint has been made will not be included in any discussion or determination of that complaint.

Further:

- (a) complaints will be investigated by the director(s) not involved in the matters the subject of the complaint;
- (b) the SRG board will provide a written acknowledgement of the complaint within 24 hours of receipt;
- (c) the SRG board will provide a written response to the complainant within 14 – 30 days from the date of the acknowledgement letter;
- (d) the SRG board will maintain a direct contact point email address for all complaints.

SRG appoints the managing director as the person responsible for implementing and maintaining this policy and the procedures herein.

3 Procedure

3.1 Making a complaint

By this policy and general systems adopted by SRG, SRG intend to provide an environment where complainants have the opportunity to raise any concerns that they may have in relation to the services and/or staff of SRG and be assured that their concerns will be addressed in a fair, consistent, efficient and effective manner.

SRG is committed to providing complainants with a simple and uncomplicated complaint process. SRG allows complainants to express their dissatisfaction by whatever method they choose (but in a civil and respectful manner) and therefore complainants may inform SRG of their complaint by:

- (a) Mail;
- (b) Email (including to the dedicated email address, or any email address controlled by SRG);
- (c) Telephone; or
- (d) Facsimile.

SRG will ensure that its staff are trained to accept and respond to complaints within a timely manner, regardless of how the complaint is received. All staff will comply with the time constraints required by this policy.

3.2 Complaint response

Where possible, staff will resolve all complaints at the time they are received. If this is not possible, staff are required to escalate the complaint to their direct manager and should the direct manager not be able to resolve the dispute or complaint, then the complainant must be referred to the SRG board, which will respond in accordance with 2.3 of this policy.

When investigating and responding to complaints, the SRG Board will:

- (a) Where relevant, immediately remove the staff member from the complainant's file;
- (b) Require (where necessary) staff to respond to a complaint investigation report issued by the SRG Board to that staff member within 24 hours of receipt;

- (c) Provide a written response in “plain English” to ensure that complainants are not disadvantaged in any way, within 14 – 30 days from the date of the acknowledgement letter advising:
- i. The SRG Board’s response to each and every matter raised in the complaint;
 - ii. That the complainant has 14 days to respond to the determination;
 - iii. The complainant’s right to raise the complaint to the managing director of SRG if the complainant remains dissatisfied in whole or in part with the response;
 - iv. That if, after having raised the complaint to the managing director, the complainant is still dissatisfied in whole or in part with the response the complainant has the right to escalate the complaint to the EDR scheme of which SRG is a member;
 - v. That the EDR scheme is a free service;
 - vi. The name and contact details of the EDR scheme of which SRG is a member.

3.3 Unresolved disputes

Where a complaint escalation process has been followed, but the same complaint as previously investigated remains unresolved, the SRG Board will inform the relevant EDR scheme provider of the complaint.

4 Complaints and privacy

SRG is committed to protecting and maintaining the privacy, accuracy and security of personal information. We are bound by the National Privacy Principles in the Privacy Act 1988, as well as other applicable laws and codes.

SRG complies with the obligations imposed by the Privacy Act 1988 and other applicable laws and codes by:

- (e) Training staff to respect the privacy of individuals in accordance with our standards, policies and procedures;
- (f) Limiting the use of personal information to the performance of our functions and activities and fulfilling our legal obligations;
- (g) Only disclosing personal information to third parties with the express or implied consent of the individual concerned, or where we are required to do so by law;
- (h) Informing individuals about the type of personal information SRG collects, why it is collected and to whom it will be disclosed.

5 Promoting compliance and ethical standards

5.1 Active Promotion

SRG will actively promote its compliance and ethical standards by ensuring that:

- (a) Stakeholders and staff are informed of this policy and all complaints statistics for each calendar year;

- (b) Complainants are informed by the escalation processes within this policy in each and every response to a complaint;
- (c) Training is provided to staff on how to:
 - i. Listen and responsible to a complainant's initial complaint;
 - ii. Attempt to resolve a complaint;
 - iii. Escalate a complaint to a manager;
 - iv. Escalate a complaint to the SRG board;
 - v. Provide information to a complainant on how, where, who and what information to include when making a written complaint.

5.2 Cultural promotion

SRG will use its in house training to actively promote a culture of compliance among its staff.

6 Complaint reporting

While it is SRG's objective to provide an environment in which the need to make complaints is eliminated, the attitude of SRG is to welcome complaints when they are received, as they provide an opportunity to resolve any misunderstandings in a manner that is fair and equitable to both SRG, its staff and the complainant, and to implement procedures which will eliminate the source of the complaint and/or its recurrence in the future.

Complaints are a source of constructive feedback which provides an opportunity to improve SRG's business and services.

The SRG board will provide a monthly report to the managing director as to:

- (a) The number of complaints received;
- (b) The nature of those complaints;
- (c) The number of complaints resolved and the determination;
- (d) The number of escalated complaints.

7 Contacts

For questions about this policy, contact Tom Jollye at tjollye@srgroup.com.au.