



Retail Client Complaints Management Policy

Vasco Trustees

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1. Overview

This policy sets out the complaints management process that Vasco Trustees Limited, Vasco Responsible Entity Services Limited or any other entity in the Vasco Group, in its capacity as responsible entity or trustee (**Vasco**) of any managed investment scheme (**Fund**) will undertake when receiving any complaint or dispute from its **Retail Clients**.

Any capitalised terms not defined in the body of this policy will be defined in the **Glossary** section at the end of this policy.

2. Complaints Management Principles

Vasco implements IDR procedures that aim to deal with complaints and disputes genuinely, promptly, fairly and consistently. Through its processes Vasco aims to develop and maintain a positive complaint management culture that welcomes and values complaints. Vasco facilitates the following standards in its complaints management culture:

- 1) Top-level commitment to supporting effective complaint management
- 2) Recognition that everyone has a right to complain and demonstration of openness to receiving complaints and a commitment to resolving complaints through action
- 3) Flexibility and accessibility
- 4) Objectivity and equity in the management of complaints with no actual or perceived bias
- 5) Appropriate data collection, analysis and internal reporting

3. Lodging Complaints

The Complainant can lodge a complaint with Vasco via:

- Telephone +61 3 8352 7120;
- Email info@vascofm.com; or
- In writing addressed to:
The Complaints Officer
Vasco Fund Services
Level 4, 99 William Street
Melbourne VIC 3000

4. Receiving Complaints

When Vasco receives a complaint, we will acknowledge the complaint within one business day or as soon as practicable, verbally or in writing.

5. Investigating Complaints

Unless your complaint is immediately resolved to your satisfaction, your complaint will be investigated by a member of Vasco.

As part of facilitating a resolution for the complaint, Vasco may ask the complainant for further information via letter or email. If there is no response to this request a reminder will be sent to the complainant.

6. Written Resolutions

IDR Response

Vasco will provide a written resolution (IDR response) to a complainant no later than 30 calendar days after receiving the complaint, informing the complainant of:

- The final outcome of their complaint (either confirmation of actions taken by Vasco to fully resolve the complaint or reasons for rejection or partial rejection of the complaint);
- Their right to take the complaint to AFCA if they are unsatisfied with the written resolution; and
- The contact details for AFCA

If within 5 business days of receiving the complaint, the complaint is resolved to the complainant's satisfaction or Vasco has issued an explanation and/or apology where Vasco cannot take further action, Vasco may not provide a written IDR response unless the complainant requests one.

Rejecting a complaint

Where Vasco rejects or partially rejects a complaint received, the IDR response will clearly set out the reasons of the decision by:

- identifying and addressing the issues raised in the complaint;
- setting out the financial firm's findings on material questions of fact and referring to the information that supports those findings; and
- providing 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.

Delay in resolution

Vasco will endeavour to provide an IDR response within 30 calendar days of receiving the complaint. However, Vasco may not be able to meet this time-frame if:

- the resolution of the individual complaint is particularly complex; or
- circumstances beyond Vasco's control are causing delays to resolution of a complaint

If there is a delay to providing the IDR response, Vasco will provide the complainant an IDR delay notification, that informs the complainant about:

- the reasons for the delay
- their right to complain to AFCA if they are dissatisfied; and
- the contact details for AFCA

7. AFCA Referral for Client Complaints

A client's complaint may be unresolved at all or within 30 calendar days using Vasco's IDR process. In this instance, Vasco will:

- Inform the complainant that they have a right to pursue their complaint with AFCA; and
- Provide details about how to access AFCA.

8. Glossary

AFCA	The 'Australian Financial Complaints Authority' who is the dispute resolution scheme for financial services.
Retail Client	A 'Retail Client' as defined in Section 761G of the Corporations Act 2001 (Cth), as amended from time to time.