



# Financial Services Complaint Management Policy

## 1. Purpose

The purpose of this Investor Complaints Policy (**Policy**) is to ensure that:

- complaints from investors are dealt with fairly, promptly and consistently
- Australian Financial Services Licence (**AFSL**) and Managed Investment Scheme (**MIS**) regulatory requirements are complied with in dealing with complaints
- if underlying systemic issues or control problems/weaknesses are identified by a complaint then they are appropriately addressed and promptly escalated for action.

This Policy only relates to complaints from clients who are investors (retail and wholesale) in relation to Dexus funds. Dexus has a separate [Customer Complaints Procedure](#) for dealing with complaints from capital partners, tenants, visitors and employees.

## 2. Who does this policy affect?

This Policy applies to all Dexus companies that hold an AFSL from time to time (each a **Licensee**), and all Representatives<sup>1</sup> of Dexus authorised to provide financial services to clients and their representatives on behalf of Dexus, who may:

- receive complaints, such as Fund Managers and Investor Relations Communications and Sustainability personnel or External Service Providers; and
- process and resolve the complaints, such as Compliance and Legal.

The requirements and processes in this Policy apply where one or more of the Licensees provides a financial service, such as issuing or transferring units in a trust, paying a distribution, issuing statements and reports about a fund in which the person is invested or generally operating a trust which is a registered MIS.

## 3. What are the obligations?

### 3.1 Complaints handling standards

#### 3.1.1 Retail Clients

Licensees that provide financial services to retail clients (as defined in the *Corporations Act*) must have a dispute resolution system that consists of:

- internal dispute resolution (**IDR**) system for complaints handling that complies with the standards and requirements made or approved by ASIC as set out in ASIC Regulatory Guide 271; and
- membership of Australian Financial Complaints Authority (**AFCA**), an external dispute resolution scheme (**EDRS**) as required by the *Corporations Act*.

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<sup>1</sup> Within the meaning in *s910A Corporations Act 2001 (Cth)* includes, but is not limited to all Dexus employees and directors

A breach of this Policy may constitute a breach of our EDRS membership conditions and a breach of section 912A(1)(g) of the *Corporations Act*.

### 3.1.2 Wholesale Clients

At Dexus, although not a legislative requirement, the IDR system outlined in this Policy and internal Investor Complaints Management Procedure also applies to Licensees that only provide services to wholesale clients. Licensees that only provide services to wholesale clients will not require a membership of AFCA.

### 3.2 What is a complaint?

A complaint is an expression of dissatisfaction made to or about Dexus, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected. It may be made verbally or in writing.

A complaint may be distinguished from:

- a general enquiry where no dissatisfaction is expressed (e.g. the investor is simply seeking information or feedback provided in surveys)
- an expression of dissatisfaction about matters which are outside the control of Dexus (e.g. market conditions)
- administrative queries (e.g. enquiries on payments or distributions, lost or mislaid cheques), unless raised on several occasions and the circumstances indicate that there may be a systemic problem, in which case the query should be considered a complaint.

## 4. What actions are required to comply with the complaints handling obligations?

### 4.1 The complaints handling process

When a complaint has been received, the relevant Complaints Handling Officer i.e., Investor Relations Manager or relevant Fund Manager, must:

- acknowledge the complaint by the **next business day** after receipt, or as soon as practicable;
- consider the complaint in accordance with this Policy and Investor Complaints Management Procedure; and
- provide a written response no later than **30 calendar days** of receipt of the complaint. In some cases a different timeframe may apply where there is complexity or circumstances beyond the Licensee's control mean that there has been no reasonable opportunity to provide the response.
- IDR Response - The response must be in writing and must state the following information:
  - the final outcome of the complaint in line with the IDR, being either confirmation of actions taken by the Licensee to fully resolve the complaint, or reasons for rejection or partial rejection of the complaint;
  - if the complaint is being rejected or partially rejected, the IDR response will clearly set out the findings on material questions of fact and referring to the information that supports those findings; and
  - All responses will also state that the complainant has the right to take their complaint to AFCA if they are not satisfied with the IDR response and provide contact details for AFCA. The response may offer redress if appropriate.

Although the Complaints Handling Officer will have primary carriage of handling the complaint, Compliance will oversee the process to ensure impartiality.

### 4.2 Complainant's rights

In accordance with the Australian Standards for Complaints Handling, the complainant has the right to:

- be addressed in an equitable, objective, and unbiased manner
- have the complaint dealt with confidentially (where requested and where appropriate)
- be informed of Dexus's procedures for dealing with complaints, including avenues for further and/or independent review

- have the complaint addressed promptly
- request and receive any material reasonably required to support their complaint
- be informed of Dexus's decision regarding their complaint, and the reasons for that decision.

#### 4.3 Corrective action in response to complaints

Once a complaint has been considered, if appropriate, corrective action will be taken as soon as possible to address the issue. Details of the action taken must be recorded in ReadNow and forwarded to the relevant Fund Manager.

Where corrective action potentially involves compensation or reimbursement to the complainant, approval will be sought from the relevant Fund Manager, as well as Head of Compliance, prior to any financial agreement being made to redress the issue.

All corrections/reimbursements should be fair and any consideration/treatment given to the complainant must not disadvantage other investors in the same product or service. Complaint resolution outcomes must be implemented in a timely manner when a complaint is closed.

Additional action may also involve

- training of the individual or business area employees
- amendments to procedures or controls
- enhancements to monitoring or review processes.

### 5. Reporting complaints to Compliance

All complaints must be recorded in the Dexus compliance tracking system including the ones received from External Service Providers.

Compliance will review the handling of complaints to ensure they are resolved appropriately, dealt with promptly, and in accordance with this Policy and relevant legal and regulatory requirements. Compliance will also consider whether any underlying systemic weaknesses may have been highlighted by the complaint.

### 6. External dispute resolution facilities

Licensees that provide financial services to retail clients are required to be members of the AFCA. Retail clients may refer their complaint to AFCA (*see section 8 of the Policy for more details*)

### 7. Complaints about, or received by, External Service Providers

When a complaint relates to a function that is delegated to an External Service Provider e.g., Registry services, the relevant Investor Relations Manager is responsible for working with the External Service Provider to resolve the complaint as soon as practical and advising Head of Compliance of progress and outcome. The relevant Relationship Manager is responsible for ensuring that the complaint is properly addressed.

All complaints received by External Service Providers must be referred to the relevant Investor Relations Manager and recorded in the Dexus compliance tracking system. The Relationship Manager is responsible for ensuring that the External Service Providers are aware of Dexus' complaints procedures and complaints are resolved in line with this Policy and applicable ASIC guides and requirements.

Compliance will monitor the ongoing performance of key External Service Providers to ensure complaints are addressed appropriately and escalated to the Relationship Manager in a timely manner.

### 8. How to make a complaint

There are several ways an investor or other person to whom a Licensee provides financial services may lodge a complaint:

1. Verbally by calling the Dexus Infoline on +61 1800 819 675
2. In writing to **Dispute Resolutions Officer**
  - i. Post: Dexus Funds Management Limited (PO Box R1822 Royal Exchange NSW 1225)

ii. Email: [ir@dexus.com](mailto:ir@dexus.com)

### 8.1 What if your complaint is still unresolved?

If you are a “retail client” (as defined in the *Corporations Act*) in respect of the services the Licensee provides to you, you have the right to take your complaint to AFCA if you are not satisfied with the response the Dexus Licensee provides. AFCA may be contacted at:

**Australian Financial Complaints Authority Limited**

GPO Box 3, Melbourne VIC 3001

Phone +61 1800 931 678 (free call within Australia)

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

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

### 9. Additional information

If you have any questions arising from this Policy, please contact:

**Head Compliance**

Phone: 02 9017 1144

Email: [compliance@dexus.com](mailto:compliance@dexus.com)

### Document Control Log

Version	Document Owner	Author	Approving Authority	Approved Date
20	Compliance	Compliance/KWM	Group Management Committee	30 Aug 21
			Dexus Board	29 Sept 21
21	Compliance	Compliance	Corporate Executive Committee	13 Dec 22