



Investor Complaints

Compliance Policy

1. Purpose

The purpose of this Investor Complaints policy is to ensure that:

- complaints from investors and potential investors are dealt with fairly, promptly and consistently
- Australian Financial Services Licence (**AFSL**) and managed investment scheme regulatory requirements are complied with in dealing with complaints
- underlying control problems/weaknesses that may be identified by a complaint are appropriately addressed

This Policy relates to consumer (retail client) complaints in relation to Dexus funds. Dexus has a separate policy for dealing with complaints from institutional or other wholesale investors, capital partners, and property, tenant and visitor related complaints.

2. Who does this policy affect?

This policy applies to all Dexus companies that hold an Australian financial services licence that authorises them to provide financial services to retail clients (each a **Licensee**) and their representatives who may:

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

The relevant Licensees are Dexus Funds Management Limited, Dexus Wholesale Property Limited, Dexus Investment Management Limited, Dexus RE Limited and Dexus Asset Management Limited.

The requirements and processes in this policy apply where one of the Dexus Licensees provides a financial service to a retail client, 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 managed investment scheme.

3. What are the obligations?

3.1 Complaints handling standards

The Licensees are members of an external dispute resolution scheme (**EDRS**) as required by the Corporations Act. From 5 October 2021, the Licensees must have in place an 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.

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, as modified by ASIC Instrument 2020/98.

3.2 What is a complaint?

A complaint is 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. It may be made verbally or in writing.

A complaint may be distinguished from:

- a general enquiry (e.g. the investor is simply seeking information)
- 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, will:

- acknowledge the complaint by the next day after receipt, or as soon as practicable; and
- consider the complaint and provide a response within 30 calendar days of receipt of the complaint, unless complexity or circumstances beyond the Licensee's control mean that there has been no reasonable opportunity to provide the response.

The response will state the final outcome of the complaint at the IDR level, being either confirmation of actions taken by the Licensee to fully resolve the complaint, or reasons for rejection or partial rejection of the complaint. It 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
- be treated courteously and be kept informed of the progress of their complaint
- 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 received and 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 the application used by Dexus to track compliance, 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.

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.

Compliance will review the handling of complaints to ensure they are resolved appropriately, dealt with promptly, and in accordance with 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

Dexus entities which are authorised to provide financial services and/or products to retail clients are members of the Australian Financial Complaints Authority (AFCA).

In respect of obligations under the Privacy Act, where the complaint cannot be resolved under the Privacy Act, it may be referred to the Office of the Australian Information Commissioner (OAIC). See the Dexus Privacy policy available at <https://www.dexus.com/privacy-policy>.

Retail client investors may refer their complaint to the external complaints facility.

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

When a complaint relates to a function that is delegated to an External Service Provider, the relevant Investor Relations Manager is responsible for referring the matter to the External Service Provider as soon as practical and advising Head of Compliance.

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 Complaints Register. The Relationship Manager is responsible for ensuring that the External Service Providers are aware of Dexus's complaints procedures and that their procedures comply with this policy and applicable ASIC standards and requirements.

8. How to make a complaint

A security holder or other person to whom a Dexus Licensee provides financial services may lodge a complaint verbally by calling the Dexus Infoline on +61 1800 819 675 or in writing to:

Dispute Resolutions Officer

Dexus Funds Management Limited
PO Box R1822
Royal Exchange NSW 1225

Or email to ir@dexus.com

Each Licensee is a member of the Australian Financial Complaints Authority (AFCA), an independent dispute resolution scheme. 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
Website: www.afca.org.au

Document Control Log

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