

Financial Services Complaint Management Policy

1. Purpose

The purpose of this Financial Services Complaint Management Policy (**Policy**) is to ensure that:

- complaints from retail and wholesale Investors are managed proactively, fairly, promptly and consistently;
- Australian Financial Services (**AFS**) Licence and Managed Investment Scheme (**MIS**) regulatory requirements are complied with when managing complaints for retail Investors; and
- if underlying systemic issues or control problems/weaknesses are identified as a result of a complaint that they are appropriately addressed and promptly escalated for action.

This Policy applies to complaints concerning financial services provided by Dexus AFS Licensees (each a **Licensee**) and all Representatives¹ of Licensees (referred to as “**Dexus**”, “**we**”, “**our**”) in connection with our financial products, including funds. Dexus has a separate Customer Complaints Policy for dealing with complaints from capital partners, tenants, visitors and employees and a separate [Policy](#) regarding management of privacy related complaints.

Throughout this Policy, the term “**Investor**” encompasses both retail and wholesale clients as defined in section 761G of the *Corporations Act 2001 (Cth)* (**Corporations Act**).

2. Who does this policy affect?

This Policy applies to all Licensees and all Representatives¹ of Licensees who receive, process or resolve complaints, including Fund Managers, Investor Relations, Communications and Fund Operations personnel and members of the Legal and Compliance teams.

3. What are the obligations?

3.1 Complaint handling standards

3.1.1 Retail Investors

Licensees that provide financial services to retail Investors must have a dispute resolution system that consists of:

- an internal dispute resolution (**IDR**) system for complaint handling that complies with the standards and requirements made or approved by the Australian Securities and Investments Commission (**ASIC**) as set out in ASIC Regulatory Guide 271 (**RG271**); and
- membership of an external dispute resolution scheme (**EDRS**). Applicable Dexus Licensees are each a member of the Australian Financial Complaints Authority (**AFCA**).

These obligations are outlined in sections 912A(1)(b), 912A(1)(g) and 912A(2) of the Corporations Act.

3.1.2 Wholesale Investors

At Dexus, although not a legislative requirement, the IDR system outlined in this Policy also applies to financial services provided to wholesale Investors, unless otherwise indicated.

3.1.3 Indirect Investors

The IDR system outlined in this Policy also applies to indirect Investors who have invested through an Investor Directed Portfolio Service (IDPS) (i.e. platform).

3.2 What is a complaint?

A complaint is an expression of dissatisfaction made to or about Dexus or our external registry services providers acting on our behalf, related to our products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected, or legally required. It may be made verbally, in writing or on a Dexus social media platform.

¹ Within the meaning in *s910A Corporations Act* includes, but is not limited to all Dexus employees, directors, authorised representatives or any other person acting on behalf of the Licensee



A complaint may be distinguished from:

- a general enquiry where no dissatisfaction is expressed (e.g. the Investor is simply seeking information)
- feedback provided in surveys or
- administrative queries (e.g. enquiries on payments or distributions, lost or mislaid cheques), unless an expression of dissatisfaction is expressed or the query is raised on several occasions due to lack of response or resolution.

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

4.1 The complaint management process

Where it is reasonable to do so, complaints should be resolved by the recipient of the complaint by the end of the fifth business day after receipt of the complaint. In such cases, the recipient acts as the Complaint Manager and is responsible for following the relevant steps outlined in this Policy. The response may be provided verbally or in writing, unless the complainant requests otherwise or it is legally required.

Where resolution by the end of the fifth business day is not reasonable, the relevant Complaint Manager is the person who has primary carriage of managing a complaint.

The Complaint Manager must consider the complaint in accordance with this Policy and must:

- determine if the issue is a complaint
- ensure acknowledgement of the complaint is sent by Dexus or the external registry services provider within one business day of receiving it, or as soon as practicable, considering public holidays.²
- Investigate and respond to the complaint

Ensure investigation of the complaint and provide a written response no later than within **30 calendar days**³ of receipt of the complaint. In some cases, a different timeframe may apply - this is where there is complexity or circumstances beyond the Licensee's control which mean that there has been no reasonable opportunity to provide the response.

IDR Response

The IDR Response must be in writing and must state the following information:

- the final outcome of the complaint, 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 reasons by identifying and addressing the issues raised as well as the findings on material questions of fact and referring to the information that supports those findings.
- all responses to retail Investors 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.

In general, an IDR Response is not required if the complaint is resolved to the complainant's satisfaction or the complainant has been given an explanation and/or apology when the Licensee can take no further action to reasonably address the complaint within five business days⁴ - unless a written response has specifically been requested, or the complaint relates to hardship.

- If there is no reasonable opportunity for the Licensee to provide an IDR Response within the required timeframe because resolution of the complaint is particularly complex, or complaint management delays are caused due to circumstances beyond the Licensee's control, an IDR Delay Notification must be provided to a retail Investor **before** the end of the 30 days.

The IDR Delay Notification must be in writing and must state the following information:

² A complaint resolved at the first point of contact is considered acknowledged at that time.

³ The timeframes for managing complaints begin on the day that the complaint is first received by Dexus or our external registry service provider, regardless of whether the day of receipt is a business day. The timeframe does not include the day the complaint is received, so Day 1 is the first business day or calendar day (depending on the circumstances eg an IDR Response Letter is required in 30 calendar days whereas complaints may be closed in 5 business days) after the complaint has been received (see RG271.58)



- the reasons for the delay; and
- state that the complainant has the right to take their complaint to AFCA if they are dissatisfied and provide contact details for AFCA.

Where the Investor is a wholesale Investor, a delay notification is not specifically required, however, the Investor will be kept up to date on the status of the investigation.

- Ensure all matters are considered prior to closure of a complaint. A complaint will be considered closed if:
 - the Investor confirms that they are satisfied with the resolution and do not wish to take the matter further.
 - circumstances exist to form a reasonable view that the matter has been resolved to the complainant's satisfaction.
 - the complainant is given an explanation and/or apology when Dexus can take no further action to reasonably address the complaint (e.g. dissatisfaction with market conditions).
- Ensure records are maintained to support the handling of each complaint.

Although the Complaint Manager will have primary carriage of managing the complaint, Compliance will oversee the process to ensure impartiality and ensure that complaints are managed in an equitable manner.

Dexus is committed to providing a safe and respectful environment for all employees and Investors. We understand that complaints and feedback are essential for improving our services. However, we do not tolerate any form of abusive, derogatory, discriminatory or defamatory behaviour (verbal or written). We will address all complaints in an equitable, professional and respectful manner, and we will not engage with individuals who display abusive behaviour. We reserve the right to terminate any interaction that becomes abusive.

4.2 Complainant's rights

In accordance with RG271 and the Australian Standard AS/NZS 10002:2014 *Guidelines for complaint management in organizations*, a complainant who is a retail Investor has the right to:

- be treated in an equitable, objective, and unbiased manner
- have their 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 their 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
- nominate a representative to lodge complaints on their behalf
- request a complaint response either in writing or verbally.

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 the Complaint Register.

Where corrective action may involve compensation or reimbursement to the complainant, approval will be sought from the relevant Head of Investor Relations or relevant Fund Manager, as well as General Counsel or 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. For members in a registered MIS, those holding interests in the same class must be treated equally, while those in different classes must be treated fairly.

Additional corrective action may also involve:

- training of Dexus or external registry services provider Representatives
- amendments to procedures or controls
- enhancements to monitoring or review processes.



5. Lodging a complaint

The Dexus IDR process is free to complainants. If you are an Investor and have a complaint about a Dexus financial product or service, you should notify our registry / Investor Relations teams in the first instance.

The [Complaints Management](#) page on the Dexus website clarifies fund-specific contact details, if required.

5.1 Listed Funds (i.e. listed on the Australian Securities Exchange)

Registry: MUFG Corporate Markets (AU Limited) (previously Link Market Services Limited)
Phone: +61 1800 819 675 (free call) (Monday to Friday, 8.30am to 5.30pm AEST time)
Email: dexus@cm.mpms.mufg.com

5.2 Unlisted/Direct Funds (i.e Direct Property, Infrastructure and Real Estate Securities funds)

- Retail funds
Registry: Boardroom Pty Limited
Phone: 1300 374 029 (toll free) (Monday to Friday, 8:30am to 5:30pm AEST time)
Email: dexus@boardroomlimited.com.au
- Wholesale funds and Institutional investors
Please contact your regular Relationship Manager or email: unlistedfunds@dexus.com

5.3 Contacting Dexus

If you are not satisfied with the response you receive from our service providers, or if you wish to contact us directly, please use the details below:

Mail: Complaints Officer, PO Box R1822, Royal Exchange, NSW 1225
Phone: + 61 2 9017 1100
Email: complaints@dexus.com

5.4 Escalation to AFCA

If an issue has not been resolved to your satisfaction, retail Investors can lodge a complaint with AFCA. AFCA provides fair and independent financial services complaint resolution that is free to consumers.

Website: www.afca.org.au
Mail: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001
Phone: 1800 931 678 (free call)
Email: info@afca.org.au

6. External dispute resolution

Eligible retail Investors may refer their complaint to AFCA. The following communications must include reference to an investors' right to refer their complaint to AFCA:

- product disclosure statements/offer documents, where applicable
- financial services guides and website disclosure information, where applicable
- periodic statements
- websites
- annual reports or other reports supplied to investors
- any other marketing material where it is considered appropriate
- correspondence setting out our response to a complaint.

Licensees that only provide financial services to wholesale Investors will not require membership of AFCA.



7. Additional information

If you require assistance with lodging a complaint or have difficulty understanding any part of this Policy, please let us know straight away on the below details so that we can assist you. We are committed to providing support, including accessible formats or assistance in your preferred language, where possible, to ensure everyone can access and understand this information.

Phone: +61 2 9017 1161 (Monday to Friday, 8.30am and 5.30pm AEST time)
Email: clientservices@dexus.com

If you have any questions arising from this Policy, please contact Dexus's Head of Compliance

Email: compliance@dexus.com