



# Complaints Handling Policy

## 1. Purpose and background

Growthpoint Properties Australia (**Growthpoint or Group**) is committed to conducting its business to the highest standard and a culture of corporate compliance, integrity and responsible and ethical behaviour.

Growthpoint comprises Growthpoint Properties Australia Limited (**GPAL**), Growthpoint Properties Australia Trust and their controlled entities, which include Growthpoint Funds Management Limited (**GFML**), Growthpoint Investment Management Pty Ltd (**GIM**), Fortius Property Investment Management Australia Ltd (**FPIMAL**) (together the **Group**). Each of GPAL, GFML, GIM and FPIMAL hold an Australian Financial Services Licence (**AFSL**) and are members of the Australian Financial Complaints Authority (**AFCA**).

Each AFSL holder is required by section 912A(1)(g)(i) and 912A(2)(a) of the *Corporations Act 2001* (Cth) (**Corporations Act**) to have internal dispute resolution procedures (**IDR**) to manage complaints made in relation to the financial services they provide.

This policy takes into account the elements of the complaint management framework set out in AS/NZS 10002:2014 and the Group's obligations under the Corporations Act and ASIC Regulatory Guide 271 – Internal dispute resolution (**RG 271**).

The purpose of this policy is to:

- ensure the prompt, effective and timely handling of such complaints;
- outline the requirements and process for the handling, reporting and analysis of such complaints received to ensure a positive complaint management culture; and
- ensure significant issues or systemic issues<sup>1</sup> arising from these types of complaints are appropriately addressed and promptly escalated for action.

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## 2. Policy application

All employees and directors of the Group must comply with this policy.

This policy applies to complaints made:

- in relation to the provision of any financial services or financial product by each AFSL holder, including complaints made by or on behalf of a securityholder or unitholder including indirect unitholders via an investor directed portfolio service in a registered managed investment scheme, unregistered managed investment scheme and/or wholesale trusts; and
- by individuals in relation to the handling of their personal information by the Group (privacy complaints).

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## 3. What is a complaint?

AS/NZS 10002:2014 defines a complaint as “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 or legally required.”

A complainant is not required to expressly state the word ‘complaint’ or ‘dispute’, or put their complaint in writing, to trigger the Group's complaints handling procedures. The Group recognises that a response or

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<sup>1</sup> Regard will be had to RG 271 in determining whether there is a systemic issue.

resolution will be “implicitly expected” if the complainant raises the expression of dissatisfaction in a way that implies that the complainant reasonably expects the Group to respond and/or take specific action.

An expression of dissatisfaction that meets the definition of a ‘complaint’ should not be categorised as ‘feedback’ or a ‘comment’, even if the Group considers that the matter does not have merit.

For avoidance of doubt, the following are not considered complaints:

- employment-related complaints raised internally;
- a general enquiry or requests for information where no dissatisfaction is expressed; and
- comments made about the Group where a response is not expected, such as:
  - feedback provided in surveys; or
  - reports intended solely to bring matters to the Group’s attention.

## 4. How can a complaint be made?

Complaints can be made by a complainant directly or by their representative. Complaints can be made verbally or in writing and via phone, letter, facsimile, email or a post on the Group’s owned or controlled social media platforms where the author is identifiable and contactable.

A complaint may be made directly to:

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| <p><b>Growthpoint (ASX:GOZ) Securityholders:</b></p> | <p>Compliance team, Growthpoint Properties Australia<br/>Level 18, 101 Collins Street<br/>Melbourne VIC 3000<br/>Australia</p> <p>T: +61 3 8681 2900<br/>E: <a href="mailto:complaints@growthpoint.com.au">complaints@growthpoint.com.au</a></p>                 |
| <p><b>Funds Management Unitholders:</b></p>          | <p>Investor Relations - Funds, Growthpoint Properties Australia<br/>Level 4, 88 Phillip Street<br/>Sydney NSW 2000<br/>Australia</p> <p>T: +61 2 9236 4700<br/>E: <a href="mailto:investors.funds@growthpoint.com.au">investors.funds@growthpoint.com.au</a></p> |

The Investor Relations team will monitor any complaints that are made on or through the Group’s social media assets (e.g. LinkedIn) or website.

If it is not clear as to whether a call/letter/social media communication received by the Group constitutes a ‘complaint’ for the purposes of this policy, it should be referred to the Compliance team or the Company Secretary for guidance.

## 5. The complaints handling process

### Receipt and recording the complaint

All complaints, regardless of the method by which they are received, must be promptly reported to the Compliance team (with supporting information and the outcome that the complainant is seeking) and recorded in the complaints register.

Records of complaints must include the complainant, how the complaint was received, the nature of the complaint and outcome sought, the response time, the person handling the complaint, status of resolution of the complaint and any other relevant information.



### **Acknowledgement of the complaint**

An acknowledgement of the complaint will be made within one business day after receipt, or where this is not possible as soon as practicable. The acknowledgment can be made verbally or in writing, having regard to the method used to lodge the complaint and any preference expressed by the complainant about communication methods.

### **Resolution of the complaint and responses**

Once a complaint has been received and acknowledged, Growthpoint will attempt to resolve the complaint as soon as possible in accordance with this Policy and the internal complaints management procedure.

A written response is not required when a complaint is resolved to the complainant's satisfaction within five business days of receipt unless the complainant has requested a response or the complaint is about hardship.

For all other complaints, a written response will be sent to the complainant within 30 days after the receipt of the complaint. The response will inform the complainant of the final outcome of the complaint, being either confirmations of actions taken to resolve the complaint or reasons for rejection or partial rejection of the complaint. If the complaint is being rejected or partially rejected, the response will set out clear and concise reasons for the decision by identifying and addressing the issues raised in the complaint, setting out the Group's findings on material questions of fact and reference to the information that supports those findings.

The response should include the name, title and contact details of the Growthpoint employee responding to the complaint and for retail investors details of the avenues open to the complainant, should they not be satisfied with the outcome.

All written responses are to be reviewed and signed off by the Company Secretary for Growthpoint securityholders or the Executive Director, Funds Management for funds management unitholders.

### **When a complaint is resolved**

A complaint is deemed to be resolved if the Group has:

- a) resolved the complaint to the complainant's satisfaction, which is deemed to have occurred if:
  - i. confirmation (verbally or in writing) of the same has been received by the complainant; or
  - ii. circumstances exist that make it reasonable for the Group to form the view that the complaint has been resolved to the complainant's satisfaction; or
- b) given the complainant an explanation and/or apology, when the Group can take no further action to reasonably address the complaint.

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## **6. Dealing with a complaint**

The Group is committed to attempting to resolve complaints in a timely and effective manner and as quickly as possible based on the nature and complexity of the complaint. Employees are encouraged to resolve complaints, wherever possible, at the first point of contact.

All complainants must be treated with respect and all employees involved in the reporting or resolution of the complaint must approach the complainant in a fair, objective, empathetic and courteous manner, without actual or perceived bias. Employees dealing with the complaint should also proactively identify if the complainant may need additional assistance.

All employees must provide assistance and information required to resolve the complaint and implement any actions required to resolve the complaint and prevent future instances of similar complaints.

There may be times where a complainant displays unreasonable or challenging behaviour as they may be angry or frustrated with their situation. The Group will not tolerate complaints that are abusive, threatening, unreasonable or vexatious or any unrealistic demands. In these sorts of scenarios, the matter should be escalated to the Company Secretary or his or her delegate for an appropriate response, which may include discontinuing contact with the complainant.

## 7. Complaints received by Registry

GPAL and GIM have appointed Computershare and Boardroom respectively to provide registry services and to act as a point of contact for securityholders or unitholders to make inquiries or complaints in respect of their securityholding or unitholding. Computershare’s and Boardroom contact details are as follows:

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| <p><b>Growthpoint (ASX:GOZ) Securityholders:</b></p> | <p><b>Computershare Investor Services Pty Ltd</b></p> <p>GPO Box 2975, Melbourne VIC 3001 Australia</p> <p>Yarra Falls, 452 Johnston Street, Abbotsford VIC 3067</p> <p>T: 1300 665 792 (within Australia) or<br/>+61 (3) 9415 4366 (International)</p> <p>E: <a href="mailto:webqueries@computershare.com.au">webqueries@computershare.com.au</a></p> |
| <p><b>Funds Management Unitholders:</b></p>          | <p><b>Boardroom (Victoria) Pty Ltd</b></p> <p>Level 7, 411 Collins Street, Melbourne VIC 3000</p> <p>T: 13000 737 760 (within Australia) or<br/>+61 2 9290 9600 (International)</p>  |

All registry related complaints received by Computershare and Boardroom from securityholders or unitholders respectively will be handled by Computershare and Boardroom in the first instance and in accordance with agreed procedures. All other complaints and registry complaints that are not resolved will be immediately forwarded by Computershare or Boardroom to the Compliance Team or Company Secretary (together with supporting information and the outcome that the complainant is seeking) who will manage the complaint in accordance with the procedure set out in the Group’s internal complaint management procedure.

## 8. Reporting and monitoring

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

Complaints data in the complaints register will be analysed and monitored quarterly by the Compliance team to identify if there are any systemic issues identified through those complaints and the effectiveness of the internal complaints management procedures set out in this policy.

If the data shows there may be systemic issues, the Company Secretary will ensure these are reported to the Board. The Company Secretary will also promptly arrange for an investigation to be undertaken and recommend any required corrective actions to prevent future occurrences to the Audit, Risk and Compliance Committee and/or relevant AFSL holder Board.

The quarterly compliance report to the Audit, Risk and Compliance Committee or relevant AFSL holder Board will include details of the following:

- the number of complaints received and closed in the quarter;
- the circumstances and underlying causes giving rise to complaints;
- the time taken to acknowledge and resolve or finalise complaints;



- the complaint outcomes, including the number of complaints resolved, unresolved, abandoned/withdrawn and/or escalated to AFCA (for complaints relating to financial services) or the Office of the Australian Information Commissioner (**OAIC**) (for privacy complaints) and any amounts paid or actions taken to resolve complaints; and
- possible systemic issues identified and trends and recommendations for improvements within the business.

The Compliance team will also be responsible for arranging the submission of IDR data to ASIC on a six-monthly basis as mandated by the Australian Securities and Investments Commission (**ASIC**) as part of the IDR data reporting framework.

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## 9. Additional avenues for complainants

### Australian Financial Complaints Authority

Retail investors who are not satisfied with the response provided may refer the complaint to the AFCA, an external complaint handling body of which Growthpoint is a member.:

Australian Financial Complaints Authority  
GPO Box 3, Melbourne VIC 3000  
E: [info@afca.org.au](mailto:info@afca.org.au)  
T: 1800 931 678 (free call)  
W: [www.afca.org.au](http://www.afca.org.au)

AFCA will not deal with complaints that have not first been referred to the Group for resolution.

### Australian Securities and Investment Commission

ASIC also has an information line on 1300 300 630, which the complainant may use to make a complaint or to obtain further information about their rights.

### Office of the Australian Information Commissioner

Privacy complaints can be lodged by ringing the OAIC hotline service on 1300 363 992. Alternatively, a complaint can be lodged in writing, online or by mail or email to:

Office of the Australian Information Commissioner  
GPO Box 5218 Sydney, NSW 2001  
E: [enquiries@oiac.gov.au](mailto:enquiries@oiac.gov.au)  
W: [www.oaic.gov.au](http://www.oaic.gov.au)

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## 10. Training

Employees of the Group who are likely to be involved in the complaints process are required to undertake training (including refresher training) on this policy to ensure complaints are managed appropriately and in a timely manner. This policy is available on the Group's website at <https://growthpoint.com.au/corporate-governance>.

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## 11. Review

This policy, and the procedures to manage complaints, will be periodically reviewed at least every two years to ensure that they are operating effectively and comply with ASIC policy (including RG 271), the Corporations

Act and the Australian Standards for complaints handling, or earlier in response to any significant regulatory, legislative or operational developments.

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## **12. Breach of this policy**

Any breach of this policy must be reported to the Company Secretary and may be regarded as a serious matter and result in disciplinary action.

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## **Policy approval date**

15 May 2024 by the Audit, Risk and Compliance Committee.