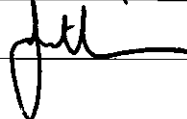


Complaints Policy

September 2016

Version History

Version	Date	Amendments	Changes made by
1	28/09/2016	New document	Directors
2	27/10/2017	General updates	Johanna Bloemendal
3	13/11/2017	Marsh details	Johanna Bioemendal
4	20/11/2018	Annual Review	Johanna Bloemendal

<i>Discussed at Board meeting (date)</i>	17 MAY 2019
<i>Approved (Signed)</i>	

Policy

If Southern Cross Partners Limited's staff become aware that a customer (either a borrower or investor) has concerns on how Southern Cross Partners Limited is dealing with them, the staff member must remind the customer of their right to use Southern Cross Partners Limited's internal complaints process (refer internal complaints procedure below), and for borrowers', access Southern Cross Partners Limited's free external dispute resolution scheme (refer external dispute resolution scheme below). If requested, Southern Cross Partners Limited should provide contact details for its Internal Dispute Resolution Contact Person, and its external dispute resolution scheme.

If staff are unsure as to whether a complaint has been made, the event should be referred to Southern Cross Partners Limited's Internal Dispute Resolution Contact Person (currently Johanna Bloemendal) for determination.

Southern Cross Partners Limited's Internal Complaints Procedure

In the event Southern Cross Partners Limited receives a complaint from a borrower, then Southern Cross Partners Limited must:

- a) within 3 working days, send a written receipt or acknowledgement to the borrower;
- b) within 5 working days after receiving the complaint, send a written request to the borrower for any further information relevant to the complaint;
- c) within 10 working days after receiving the complaint, decide whether or not the complaint is justified, and notify the borrower in writing the manner in which the complaint is to be dealt with.
- d) should Southern Cross Partners Limited's appointed Internal Dispute Resolution Contact Person (currently Jo Bloemendal) determine that the complaint is not justified, the borrower should be

reminded of the borrower's right to use Southern Cross Partners Limited's external dispute resolution scheme, and contact details for the external scheme.

- e) Log the details of the complaint in the Complaints register, along with any supporting documents.

In the event the complaint is sent to the external dispute resolution scheme, we will act accordingly on instruction from them.

Southern Cross Partners Limited's External Dispute Resolution Scheme

Southern Cross Partners Limited has an external dispute resolution scheme which can be accessed, free of charge, by a borrower by contacting:

Financial Services Complaints Limited
P O Box 5967
Lambton Quay
Wellington 6011
[https://www.fscl.org.nz/
complaints@fscl.org.nz](https://www.fscl.org.nz/complaints@fscl.org.nz)

This information is also disclosed on our website at <http://www.southerncrosspartners.co.nz/loans/terms-and-costs/complaints-and-disputes/>.

If and when complaints are referred through to FSCL, they will be handled by the Internal Dispute Resolution Contact Person (currently Jo Bloemendal), and also need to be reported to our insurance contact at Marsh via email (Justin.Nidd@marsh.com).

SCFL policy is to ensure that its staff are capable of recognising when a customer is making a complaint by:

- a) discussion with existing staff at a staff meeting
- b) discussion with new employees

Training on this policy will be given to all staff at least annually, and records will be kept in the Training folder. All new staff will receive training on this Complaints policy as part of their Compliance training, to be held in the first 2 weeks of employment, and records will be kept in the Training folder.

All staff have been trained to look for all types of customer feedback including complaints, compliments and suggestions. Staff are to send all (resolved or unresolved) customer feedback forms (see appendix 1) to the Internal Dispute Resolution Contact Person within 3 days of receipt.

The Dispute Resolution Contact Person is responsible for ensuring all complaints, compliments and feedback (reported either formally or informally) are logged in the Complaints register. The Complaints register will form part of the monthly reporting prepared by the Compliance Manager, to the Board.

Review

This policy will be reviewed regularly, and at least annually, to ensure the policy is relevant and details are current.

Customer Feedback Form

Customer Name	
Today's Date	
Date received	
Investor/Borrower/ Other (pls specify)	
Method of feedback (email attached/written attached/verbal)	
Summary of feedback	
Staff Member	
How was this resolved/Compliance Manager to review or resolve	
Any additional comments	