



# **Southern Cross Partners Limited**

## **Complaints Policy**

January 2021

### About this document

Successful complaint resolution is a high driver of customer satisfaction. Southern Cross is driven to meet our commitments to our customers and embed a customer-focused culture. Problems and complaints are a normal part of any relationship, including lending. Resolving our customers' issues and complaints is a critical element of delivering customer service. We aim to fix things quickly and correctly the first time and ensure our customers are happy with the outcome. Having a no-blame customer-focused culture means we should capture all problems we're told about, so we can identify common issues and fix them. If we understand what our customers are tell us, we can address systemic issues, better manage costs, and improve our customer experience.

### Approval

<b>Business Owner:</b>	Johanna Bloemendal
<b>Authorised by:</b>	<i>Julia R. Richardson</i>
<b>Date:</b>	<i>16/5/2023</i>
<b>Document Name/Number:</b>	1

### Version Control

Version	Date	Author	Description
0.1			Draft policy
1.0			Policy published
1.1	26/01/2022	Johanna Bloemendal	Annual review
1.2	27/02/2023	Johanna Bloemendal	Annual review

## What is a complaint?

A complaint is when a customer expresses their dissatisfaction with a particular product or service.

## Complaint Handling Principles

Southern Cross has adopted a set of complaint handling principles to ensure customer complaints are handled fairly. Our approach to managing complaints is built on these principles.

We will:

- Listen to our customers
- Admit our error if we have done the wrong thing
- Acknowledge when we have done wrong and apologise
- Seek to resolve the situation to our customer’s satisfaction where possible. If we can’t agree on a solution, we will clearly explain our position and, where appropriate, provide escalation avenues
- Explain our procedures and timeframes to consider the complaint
- Engage with our customer, or their representative, using plain language and, where possible, maintain a single point of contact
- Take extra care in sensitive matters and circumstances where our customer is vulnerable
- Be even handed and consistent in our approach to complaint management and compensation for financial and non-financial loss
- Analyse complaints to identify and address possible systemic issues.

## What if you’ve received a Complaint?

- We welcome all customer feedback, including complaints, and customers can lodge a complaint; however they like – in person, by phone, email, or letter.
- We fix customer issues at the front line and escalate through to the Compliance Manager until it’s resolved to the customer’s satisfaction.
- If a customer talks to you about a complaint or hands you a complaint, take steps to address the issues immediately.
- We must not bounce the customer around our organisation and make them tell their story over and over again until they finally find the right person. It’s your responsibility to work on the customer’s behalf to find the right person.
- The Compliance Manager will ensure to log the details of the complaint in the Complaints Register, along with any supporting documents.

## Response Times

<b>Within 3 Working Days</b>	Send a written receipt or acknowledgment to the customer
<b>Within 5 Working Days</b>	Send a written request to the customer for any further information relevant to the complaint
<b>Within 10 Working Days</b>	Decide whether the complaint is justified and notify the customer in writing how the complaint is dealt with.

## Need to escalate a complaint?

Complaints can be escalated internally to Southern Cross's Compliance Manager, Johanna Bloemendal.

<b>Internal Dispute Resolution Rep</b>	Johanna Bloemendal
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## External Dispute Resolution Scheme

If as part of the escalation process, the Internal Dispute Resolution Representative determines that the situation becomes deadlocked or we are unable to resolve it to the client's satisfaction, the Borrower should be reminded of their right to use Southern Cross's independent and external dispute resolution scheme and provide the contact details for them. Our customers can access our external dispute resolution scheme free of charge. In this event, the complaint is referred to the external dispute resolution scheme; we will act accordingly on instruction.

<b>Dispute Resolution Scheme</b>	Financial Services Complaints Limited (FSCL) – A Financial Ombudsman Service. Level 4, Sybase House, 101 Lambton Quay, Wellington 6011 <a href="http://www.fscl.org.nz">http://www.fscl.org.nz</a> <a href="mailto:complaints@fscl.org.nz">complaints@fscl.org.nz</a>
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This information is also on our website at: <http://www.southerncrosspartners.co.nz/loans/terms-and-costs/complaints-and-disputes/>.

If and when complaints are referred through to our external dispute resolution scheme, they will be handled by our Internal Dispute Resolution Contact rep, Johanna Bloemendal and also need to be reported to our insurance contact at Marsh via email ([Justin.Nidd@marsh.com](mailto:Justin.Nidd@marsh.com)).

## Training

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 four weeks of employment, and records will be kept in the training folder.

## Where do I go for support?

Speak to your Manager or Internal Disputes Resolution Rep if you are unsure about whether:

- your customer is making a complaint
- the complaint should be recorded as an incident
- the complaint should be retained or escalated.

## Appendix 1 - Customer Feedback Form

Customer Name	
Today's Date	
Date Received	
Investor/Borrower/ Other (Please 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	

# Acknowledgment

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By filling out the information and signing below, you indicate that you have read and understood the policy's contents and agree to act consistently with it. However, the absence of a signed copy of the policy is not an indication that it has not been made known and available to you, or that the policies do not apply to you.

Name:

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Position:

\_\_\_\_\_

Date:

\_\_\_\_\_

SIGNED:

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