

AUS LENDING PTY LTD

ACN 154 091 335 | Australian Credit Licensee

COMPLAINTS AND DISPUTE RESOLUTION POLICY

Compliant with ASIC Regulatory Guide 271 (RG 271)

1. Document Control

Policy Title	Complaints and Dispute Resolution Policy
Policy Owner	Complaints Manager, Aus Lending Pty Ltd
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Approval Authority	Chritopher Brittain
Applicable Entity	Aus Lending Pty Ltd ACN 154 091 335
AFCA Member Number	29977

2. Purpose and Scope

2.1 Purpose

The purpose of this policy is to establish the internal dispute resolution (IDR) framework of Aus Lending Pty Ltd ("**Aus Lending**", "**we**", "**us**", "**our**"). This framework ensures that all complaints are handled in a manner that is fair, timely, transparent, and compliant with the requirements of:

- ASIC Regulatory Guide 271: *Internal Dispute Resolution* (RG 271), effective 5 October 2021;
- The *National Consumer Credit Protection Act 2009* (Cth) (**NCCP Act**);
- The *National Credit Code* (Schedule 1 of the NCCP Act) (**NCC**); and
- The ASIC Corporations, Credit and Superannuation (Internal Dispute Resolution) Instrument 2020/35.

2.2 Scope

This policy applies to all complaints received by Aus Lending from:

- Customers and former customers;
- Prospective customers;
- Guarantors and proposed guarantors;
- Authorised representatives of any of the above (including legal representatives, financial counsellors, and other third-party advocates).

The policy covers complaints about all credit products and services provided by Aus Lending, including but not limited to credit contracts, consumer leases, credit assistance, and related services.

This policy applies to all Aus Lending directors, officers, employees, contractors, and authorised representatives.

3. Regulatory Framework

This policy has been developed in accordance with, and is governed by, the following legislation, regulatory instruments, and standards:

Instrument	Relevance
<i>National Consumer Credit Protection Act 2009</i> (Cth)	Establishes the licensing framework for credit activities, including the obligation to have IDR procedures that comply with ASIC's standards.
<i>National Credit Code</i> (Schedule 1, NCCP Act)	Governs credit contracts, consumer leases, financial hardship applications (Part 3, ss 72–75), and default notice requirements (s 88).
ASIC Regulatory Guide 271 (September 2021)	Sets out ASIC's enforceable IDR standards and guidance for Australian financial firms, including complaint definition, timeframes, and reporting.
ASIC Corporations, Credit and Superannuation (Internal Dispute Resolution) Instrument 2020/35	The legislative instrument containing ASIC's enforceable IDR standards referenced in RG 271.
Australian Financial Complaints Authority (AFCA) Rules and Operational Guidelines	Governs the external dispute resolution scheme of which Aus Lending is a member.
<i>AS 10002:2022 Guidelines for Complaint Management in Organizations</i>	Australian Standard providing best-practice guidance on complaint management systems and processes.
<i>Privacy Act 1988</i> (Cth) and Australian Privacy Principles (APPs)	Governs the collection, use, disclosure, and storage of personal information in the complaint-handling process.

4. Definition of Complaint

4.1 For the purposes of this policy, a "**complaint**" is defined in accordance with RG 271 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."

4.2 A complaint does **not** need to use the word "complaint." Any expression of dissatisfaction that meets the above definition will be captured and treated as a complaint under this policy, regardless of the language used by the person.

4.3 Complaints may be received through any channel, including:

- **Verbally** — in person at our offices or by telephone;
- **In writing** — by letter, email, or online complaint form; or
- **Through a representative** — including a legal representative, financial counsellor, family member, or other authorised third party.

4.4 All staff are trained to identify expressions of dissatisfaction that constitute a complaint, including where the complainant does not expressly state that they wish to make a complaint.

5. Our Commitment — IDR Principles

Aus Lending is committed to handling all complaints in accordance with the following principles, drawn from RG 271 and *AS 10002:2022*:

5.1 Visibility and Accessibility

5.1.1 This policy is published on the Aus Lending website and is available at point of sale. A copy will be provided to any person upon request, free of charge.

5.1.2 Information about how to make a complaint is included in our credit guides, disclosure documents, and key communications to customers.

5.1.3 This policy and related complaint materials are available in accessible formats upon request, including large print, audio, and translated materials. Interpreter services are available (see Section 17).

5.1.4 Staff are trained to assist customers who may be vulnerable, including those experiencing financial hardship, family violence, disability, language barriers, or other forms of disadvantage.

5.2 Responsiveness and Timeliness

- 5.2.1** Aus Lending will acknowledge receipt of every complaint within **one (1) business day** of receipt, or within **24 hours** for urgent complaints or complaints involving financial hardship.
- 5.2.2** All complaints will be resolved within the timeframes specified in Section 7 of this policy, in accordance with the maximum timeframes set out in RG 271.
- 5.2.3** Where a complaint cannot be resolved within the applicable timeframe, we will notify the complainant of the delay, explain the reasons, and inform them of their right to escalate the complaint to the Australian Financial Complaints Authority (AFCA) at any time.

5.3 Objectivity and Fairness

- 5.3.1** Complaints will be handled by staff members who had no prior involvement in the subject matter of the complaint, unless otherwise agreed by the complainant.
- 5.3.2** Decisions will be based on the available evidence, applicable law, relevant codes of practice, good industry practice, and what is fair and reasonable in the circumstances.
- 5.3.3** All complainants will be treated with courtesy, respect, and without discrimination or prejudice.

5.4 Confidentiality and Privacy

- 5.4.1** All personal information collected during the complaint-handling process will be handled in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (APPs).
- 5.4.2** Complaint information will be used only for the purposes of resolving the complaint, identifying systemic issues, and meeting regulatory reporting obligations.
- 5.4.3** Information relating to a complaint will be shared only with those persons who need access to it in order to investigate and resolve the complaint, or as required by law.

5.5 Customer-Focused Approach

- 5.5.1 All communications with complainants will be in **plain language**, avoiding legal jargon and technical terms where possible.
- 5.5.2 Complainants will receive regular updates during the investigation of their complaint, including notification of any delays.
- 5.5.3 Complainants may be accompanied or represented by a person of their choice, including a legal representative, financial counsellor, family member, or advocate.
- 5.5.4 **No fees are charged** for lodging or handling a complaint. The IDR process is free of charge to the complainant.

5.6 Accountability

- 5.6.1 Senior management maintains oversight of the IDR process and is responsible for ensuring compliance with this policy and the regulatory requirements.
- 5.6.2 Complaint data, trends, and systemic issues are reported to the Board or senior leadership on a regular basis (see Section 15).
- 5.6.3 Staff performance measures include complaint handling quality, timeliness, and adherence to this policy.

6. How to Make a Complaint

If you are dissatisfied with any product, service, or conduct of Aus Lending or its representatives, we encourage you to let us know. You can make a complaint through any of the following channels:

Channel	Details
Phone	0412120737
Email	chris@auslending.com.au
Post	Complaints Officer, Aus Lending Pty Ltd, 122 Pagan Road, Yatala QLD 4207
In person	Visit our office at 122 Pagan Road, Yatala QLD 4207

Channel	Details
Online	Through our website contact form at https://auslending.com.au/contact/

You may also lodge a complaint through an **authorised representative**, including a financial counsellor, legal representative, family member, or other person authorised to act on your behalf.

When making a complaint, it is helpful (but not required) to provide:

- Your name and contact details;
- Your account or loan reference number (if applicable);
- A description of the issue and what outcome you are seeking; and
- Any supporting documents or information.

7. IDR Timeframes

Aus Lending will resolve all complaints within the maximum timeframes required by RG 271. The following timeframes apply:

Stage / Complaint Type	Maximum Timeframe
Acknowledgment of complaint	Within 1 business day of receipt (or within 24 hours for urgent or hardship matters)
Standard complaints	Maximum 30 calendar days from the date of receipt
Credit-related hardship complaints	Maximum 21 calendar days from the date of receipt
Default notice complaints	Must be resolved before the default notice is issued or enforcement action is taken, and respond within 21 days.
Complaints involving a request to postpone enforcement proceedings	Must be resolved before enforcement action proceeds

Important — When the Clock Starts

The applicable timeframe begins on the date the complaint is **received** by Aus Lending, not the date it is allocated to a complaint handler or first reviewed.

If Aus Lending is unable to resolve a complaint within the applicable maximum timeframe, we will:

1. Notify the complainant of the delay and the reasons for the delay;
2. Provide an expected new timeframe for resolution;
3. Inform the complainant of their right to escalate the complaint to the Australian Financial Complaints Authority (AFCA) at any time; and
4. Provide AFCA's contact details (see Section 13).

8. Complaint Handling Process

Aus Lending follows a structured, five-step process for handling all complaints:

8.1 Step 1 — Receipt and Logging

8.1.1 Every complaint is logged in Aus Lending's centralised **Complaints Register** immediately upon receipt, regardless of the channel through which it is received.

8.1.2 Each complaint is assigned a unique reference number and the following details are recorded:

- Date and time of receipt;
- Complainant's name and contact details;
- Nature and description of the complaint;
- Product or service involved;
- Channel through which the complaint was received; and
- Whether the complaint involves financial hardship, vulnerability, or urgency.

8.2 Step 2 — Acknowledgment

8.2.1 Written acknowledgment is provided to the complainant within **one (1) business day** of receipt, including:

- The unique complaint reference number;
- The name and contact details of the assigned complaint handler;
- The expected timeframe for resolution; and
- A reference to this policy and the complainant's right to escalate to AFCA at any time.

8.3 Step 3 — Assessment and Investigation

8.3.1 The complaint is assessed for complexity, urgency, and whether it involves financial hardship or customer vulnerability.

8.3.2 All relevant documents, records, and information are gathered and reviewed. The complainant is given the opportunity to provide any additional information they wish to be considered.

8.3.3 Where the complaint is complex or involves multiple issues, the complainant is kept informed of progress at regular intervals.

8.4 Step 4 — Resolution

8.4.1 The decision on the complaint is communicated to the complainant **in writing**.

8.4.2 If the complaint is **resolved to the complainant's satisfaction**, written confirmation of the agreed outcome and any remedies is provided.

8.4.3 If the complaint is **not resolved in the complainant's favour** (wholly or partly), a formal IDR Response is issued in accordance with Section 9 of this policy.

8.5 Step 5 — Follow-Up

8.5.1 After a complaint is resolved, Aus Lending will follow up to confirm that the agreed remedy has been fully implemented.

8.5.2 The complaint file is updated with the outcome, date of resolution, and any lessons learned, and is then closed in the Complaints Register.

9. IDR Response Requirements

In accordance with RG 271.85–271.98, where a complaint is not resolved in the complainant's favour (wholly or partly), Aus Lending will issue a written **IDR Response**. The IDR Response must include the following:

9.1 The **outcome** of the complaint and the **reasons** for the decision, explained clearly and in plain language.

9.2 A summary of the **evidence and information** relied upon in reaching the decision.

9.3 Notification of the complainant's **right to escalate** the complaint to the Australian Financial Complaints Authority (AFCA) if they are dissatisfied with the outcome.

9.4 AFCA's full contact details:

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

9.5 Information about any applicable **time limits** for lodging a complaint with AFCA.

10. Financial Hardship

10.1 Aus Lending recognises its obligations under **Part 3 of the National Credit Code** (ss 72–75) regarding financial hardship. We are committed to working with our customers who are experiencing financial difficulty.

10.2 If you are experiencing financial hardship, you may request a variation to your credit contract. Variations may include, but are not limited to:

- Extension of the term of the credit contract;
- Reduction in the amount of each repayment;

- Deferral or postponement of repayments for an agreed period;
- Capitalisation of arrears; or
- Any other arrangement appropriate to your circumstances.

10.3 Hardship applications will be assessed on their individual merits, taking into account your personal circumstances, income, expenses, assets, liabilities, and your capacity to meet varied obligations.

10.4 Timeframe: Complaints related to financial hardship must be resolved within **21 calendar days** from the date of receipt, in accordance with RG 271.

10.5 If a hardship application is declined, you will be provided with **written reasons** for the decision and informed of your right to escalate the matter to AFCA.

10.6 Aus Lending will **not** issue a default notice or commence enforcement proceedings while a hardship application or related complaint is being assessed (see Section 11).

10.7 Staff are trained to identify indicators of financial hardship and vulnerability, and to respond with empathy and practical assistance.

10.8 Customers experiencing financial difficulty may also be referred to the following free external support services:

- **National Debt Helpline:** 1800 007 007 (free call, Monday to Friday)
- **Community legal centres** — for free legal advice and assistance
- **Financial counselling services** — available through the National Debt Helpline or local community organisations

11. Default Notices and Enforcement

11.1 Under **section 88 of the National Credit Code**, a default notice must not be issued if the customer has made a hardship application under section 72 of the NCC that has not yet been decided.

11.2 Aus Lending will **not** issue a default notice, commence repossession proceedings, or take other enforcement action while:

- A hardship application or complaint related to financial difficulty is being considered;
- An IDR complaint about a default notice remains unresolved; or
- An AFCA complaint about a default notice is open.

11.3 If a default notice has already been issued and a complaint is subsequently received relating to the default notice or the underlying financial difficulty, Aus Lending will **suspend enforcement action** pending resolution of the complaint.

11.4 All complaints relating to default notices are treated as **urgent** and are prioritised accordingly.

12. Remedies

Where a complaint is upheld (wholly or partly), Aus Lending may offer one or more of the following remedies, depending on the nature and circumstances of the complaint:

12.1 An **apology** (verbal or written).

12.2 **Correction** of the error, omission, or issue that gave rise to the complaint.

12.3 **Reversal or refund** of fees, charges, or interest incorrectly applied.

12.4 **Variation of the credit contract**, including hardship arrangements under the NCC.

12.5 **Waiver or release** of amounts owing.

12.6 **Financial compensation** for loss, damage, or inconvenience suffered as a result of the conduct or error.

12.7 **Correction of credit reporting information** with credit reporting bodies where inaccurate information has been reported.

12.8 **Process or policy changes** to prevent recurrence of the issue.

12.9 Any **other remedy** that is appropriate and fair in the circumstances.

13. Australian Financial Complaints Authority (AFCA)

13.1 Aus Lending is a member of the **Australian Financial Complaints Authority (AFCA)**. Our AFCA Member Number is **[Insert AFCA Member Number]**.

13.2 If you are not satisfied with the outcome of our IDR process, or if your complaint has not been resolved within the applicable timeframe set out in Section 7, you may escalate your complaint to AFCA **free of charge**.

13.3 You may also lodge a complaint with AFCA at any time during the IDR process.

13.4 AFCA Contact Details:

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

13.5 **Time limits** may apply to complaints lodged with AFCA. You should contact AFCA directly or visit their website for information about applicable time limits.

14. Systemic Issues and Serious Contraventions

14.1 Systemic Issue Identification

14.1.1 Aus Lending actively monitors complaint data to identify **systemic issues** — that is, patterns of complaints that indicate a broader problem affecting multiple customers or arising from a systemic failure in processes, products, systems, or conduct.

14.1.2 Complaint data is analysed regularly to detect recurring themes, trends, root causes, and potential systemic failures.

14.2 Response to Systemic Issues

When a systemic issue is identified, Aus Lending will:

5. Investigate the **root cause** of the issue;
6. Identify all **affected customers**, including those who have not lodged individual complaints;
7. Take steps to **remediate** affected customers, which may include proactive contact, refunds, corrections, or other appropriate action;
8. Implement **corrective action** to prevent recurrence of the issue; and
9. **Escalate** the issue to senior management and, where required, report it to ASIC and/or AFCA.

14.3 Serious Contraventions

14.3.1 Serious contraventions of financial services or credit laws are reported to ASIC as required by law, including under **section 50A of the NCCP Act** and **section 912D of the Corporations Act 2001** (Cth).

14.3.2 The Complaints Manager, in conjunction with the compliance function and senior management, is responsible for identifying and escalating potential serious contraventions.

15. Data Collection and Reporting

15.1 Complaints Register

All complaints are recorded in a centralised **Complaints Register**. The following information is captured for each complaint:

Data Field	Description
Date received	The date the complaint was first received by Aus Lending
Date resolved	The date on which the complaint was resolved or an IDR Response was issued
Nature and category	Classification of the complaint (e.g., fees, hardship, conduct, disclosure)
Product or service	The credit product or service to which the complaint relates
Outcome and remedy	The outcome of the complaint and any remedy provided
Time to resolve	The number of calendar days taken to resolve the complaint
AFCA escalation	Whether the complaint was escalated to AFCA

15.2 Regulatory Reporting

15.2.1 Complaint data is reported to ASIC **twice yearly** in accordance with ASIC's IDR data reporting requirements.

15.3 Internal Reporting

15.3.1 Internal reporting to the Board or senior management occurs [quarterly/monthly — *select applicable frequency*] and includes:

- Complaint volumes and trends;
- Timeframe compliance rates;
- Complaint categories and root causes;
- Systemic issues identified and actions taken;
- AFCA escalation data and outcomes; and
- Recommendations for process or policy improvements.

16. Staff Training and Accountability

16.1 All Aus Lending staff (including directors, employees, contractors, and authorised representatives) receive **initial and ongoing training** in the following areas:

- Complaint identification — recognising expressions of dissatisfaction that constitute a complaint under the RG 271 definition;
- Complaint handling procedures — this policy, including logging, acknowledgment, investigation, and resolution;
- RG 271 requirements and IDR timeframes;
- Financial hardship and vulnerability recognition and response;
- Privacy and confidentiality obligations under the *Privacy Act 1988* and APPs;
- AFCA escalation procedures and external dispute resolution; and
- Dealing with customers who may be experiencing family violence, disability, or other forms of disadvantage.

16.2 Complaint handling performance, including quality, timeliness, and compliance with this policy, is included in **staff performance reviews**.

16.3 The **Complaints Manager** is responsible for the day-to-day operation and administration of the IDR system and reports to senior management on complaint-related matters.

17. Accessibility

Aus Lending is committed to ensuring that our complaint-handling process is accessible to all customers, including those with disability, language barriers, or other accessibility needs.

17.1 This policy is available on the Aus Lending website and will be provided upon request, free of charge.

17.2 This policy and complaint-related communications can be provided in **accessible formats** upon request, including:

- Large print;

- Audio format; and
- Translated materials.

17.3 Interpreter services are available, including:

- **Auslan interpreting** for Deaf and hard of hearing customers;
- **Telephone interpreting** through TIS National on **131 450**.

17.4 The TTY/National Relay Service (NRS) is available for customers who are deaf or have hearing or speech impairments:

- **NRS:** 133 677
- **Access Hub:** www.communications.gov.au/accesshub

17.5 Aus Lending staff will provide appropriate assistance throughout the complaint process to customers with disability, language barriers, or other accessibility needs, including allowing additional time and offering alternative communication methods.

18. Policy Review

18.1 This policy is reviewed **at least annually** and updated as required to reflect changes in legislation, regulatory guidance, industry standards, AFCA Rules, or Aus Lending's operational practices.

18.2 The next scheduled review date is: **[Insert Date]**.

18.3 Ad hoc reviews may be triggered by changes to the NCCP Act, NCC, ASIC regulatory guidance, AFCA Rules, or as a result of internal audits, systemic issue findings, or significant complaint trends.

18.4 All amendments to this policy must be approved by [Insert Approval Authority — e.g., the Board of Directors or Managing Director].

19. Contact Us

If you wish to make a complaint or have any questions about this policy, please contact us:

Channel	Details
Channel	Details
Phone	0412120737
Email	chris@auslending.com.au
Post	Complaints Officer, Aus Lending Pty Ltd, 122 Pagan Road, Yatala QLD 4207
In person	Visit our office at 122 Pagan Road, Yatala QLD 4207
Online	Through our website contact form at https://auslending.com.au/contact/

If you are not satisfied with our response, you may contact **AFCA**:

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

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This policy is reviewed annually. For the most current version, please visit our website or contact us directly.