

Council SmartBonds

Dispute Resolution Process

1. Introduction

Asurety Pty Ltd ABN 24 072 366 968 of Level 6, 352 Kent Street Sydney NSW 2000 trading as SmartBonds ("SmartBonds") is dedicated to providing you with excellent customer service and complete satisfaction.

From time to time, there may be occasions when our service does not meet the high standards we set out for ourselves, or that you as a customer might reasonably expect of us.

This complaints and dispute resolution policy governs how we handle complaints you may wish to raise with us in these situations.

2. Policy objective

The objective of this policy is to embed a fair and efficient complaint handling process.

In developing this policy, SmartBonds has adopted industry best practice and benchmarked its customer complaints process against the Australian Standard AS ISO 10002-2006 'Customer satisfaction – Guidelines for complaints handling in organizations'.

Commitment

We are committed to an integrated complaint handling process and to providing the necessary support and resources for that process to operate effectively (including the provision of appropriately trained staff and having robust complaints reporting procedures in place).

Visibility

We will ensure that information about how to make complaints and how we will handle any complaint is well-publicised and easily available to customers, our employees and other interested parties, including by:

- making this policy freely available on our website;
- providing free copies of this policy on request;
- setting out our contact details in this policy, so that readers can contact us for further information or to raise a complaint;
- cross-referencing this policy in other SmartBonds documents, and
- setting out the contact details for the Financial Ombudsman in each jurisdiction in which we operate.

Accessibility

We will ensure that our complaints handling processes are easily accessible to you and all customers who wish to make a complaint, including through:

- the visibility measures set out above;
- providing a range of methods through which complaints can be lodged, including online, by phone, email and post; and
- providing appropriate complaint lodgement arrangements and other support for customers with special needs, including by providing interpreter services where necessary.

Responsiveness

We will respond appropriately to your complaint including by:

- using best endeavours to respond to a small customer's written enquiry or complaint within 7 business days by answering the enquiry or complaint or acknowledging its receipt and indicating how we will deal with the complaint or enquiry;
- otherwise writing to you within 10 business days to acknowledge receipt of your complaint;
- responding to a small customer's telephone enquiry in accordance with our obligations under the law;
- recording your complaint in our client management system;
- advising you of the period within which we expect to address your complaint;
- assigning your complaint to the relevant person or department at SmartBonds;
- addressing your complaint in a timely fashion, having regard to the nature of the complaint and the complexity of the relevant circumstances;
- tracking our progress in addressing your complaint in our customer management system;
- updating you as to our progress in addressing your complaint, and the period within which we expect to resolve the complaint; and
- advising you of our proposed resolution of your complaint, or any other proposed outcome, as soon as practicable.

Objectivity

We will ensure that your complaint is addressed in a manner, which is:

- fair;
- flexible;
- objective;
- impartial; and
- consistent with this policy, all applicable laws and other regulatory instruments, and our handling of any previous complaint of a similar nature.

Charges

We will not impose any charge or fee for lodging a complaint, or requesting information in relation to complaints or a copy of this policy.

Confidentiality

We will comply at all times with the Privacy Act 1988 (Cth) (Privacy Act), other privacy laws and our Privacy and Credit Reporting Policy when collecting, using, storing or disclosing your personal information or sensitive information (these types of information are defined in the Privacy Act).

We will only request your personal information or sensitive information when we require it in order to provide our services, or in relation to a complaint in relation to us or our services.

Where we provide products or services to you on credit (that is, you will pay for those products or services after we start providing them to you), we are a credit provider for the purposes of the Privacy Act.

As such, we will comply with rules in the Privacy Act in relation to the handling of information relating to credit reporting including those relating to your rights to access and correct that information and to raise related complaints.

Investigation of complaints

We will use all reasonable efforts to investigate all relevant circumstances and other information in relation to your complaint.

Customer-focused approach

We aim to distinguish ourselves by our high level of customer service.

We will at all times adopt a customer-focused approach, both in handling your complaint and in all other dealings with you, including by:

- ensuring you are able to lodge your complaint easily and effectively in accordance with this policy;
- complying at all times with this policy and all applicable laws and other regulatory instruments in relation to the handling and resolution of your complaint;
- keeping you updated as to our progress in resolving your complaint; and
- always treating you in a courteous and respectful manner.

Accountability

We will ensure we are fully accountable for your complaint, including by:

- giving you an opportunity to provide comments or ask questions;
- giving you the contact details for the appropriate Financial Ombudsman and advising of your right to refer the complaint to the Financial Ombudsman if our proposed resolution is not satisfactory;
- providing complaints resolution procedures in accordance with this complaints resolution policy; and
- recording the details of your complaint in our client management system, and using this information to measure broader customer satisfaction with our services and help us improve our services.

Continual improvement

We will seek to continually improve our customer service and our complaints resolution policy and procedures, including by:

- reviewing and updating this policy on a regular basis, as discussed below; and
- recording complaints in our client management system, and using this to measure customer satisfaction with our services and help us improve our services.

3. What is a complaint?

A complaint is an expression of dissatisfaction made to SmartBonds where a response or resolution is expected.

It may be related to our products, services, policies, procedures or the complaints-handling process itself.

A complaint also includes a request by a small customer to review their bill.

4. What happens when a complaint is received?

When a complaint is received:

- we will listen to or consider your complaint, provide relevant information to you and take all responsible steps to resolve the complaint;

- we will accurately record the details of the complaint, give it fair and genuine consideration and seek to achieve a fair outcome;
- we will investigate and enquire into the complaint and consult with the relevant staff as necessary within a reasonable timeframe, having regard to the nature and complexity of the complaint;
- we will keep you informed of any progress and seek to resolve the complaint quickly and directly in a way that is fair and reasonable;
- we will treat the complaint with respect and handle personal information in accordance with our Privacy and Credit Reporting Policy;
- if appropriate, we will recommend changes or actions to remedy the situation to prevent the situation recurring;
- we will promptly inform you of the outcome of the complaint and the reasons for the outcome;
- if you are dissatisfied with a decision or outcome, we will inform you that you can request to have the outcome or decision reviewed internally (see section 5 below). We will also inform you of your right to refer the complaint or dispute to the appropriate Financial Ombudsman and we will provide you with the contact details of that Financial Ombudsman;

5. How to raise a complaint

Step 1: Get in contact with us

We ask that you please contact us if you are unhappy with anything in relation to us or our services, and give our customer service representative the opportunity to resolve your complaint. You can get in touch with us using the contact details set out below:

Telephone: 1300 247 300

Email: contact@smartbonds.com.au

Address: Level 6, 352 Kent Street Sydney NSW 2000

Step 2: If necessary, escalate your complaint

If our customer service representative is not able to provide you with a satisfactory resolution, you can immediately escalate your complaint to the customer service manager. The customer service manager will take ownership of your complaint and work with you to fix the problem.

Step 3: If necessary, register an official complaint

If you are still not satisfied with our attempts to resolve your complaint, you can register an official complaint. In registering your official complaint and to help us resolve it as quickly as possible, we will ask you to give us as much information as you can in relation to the complaint, its cause and other relevant circumstances. We will record the details of the complaint in our client management system, and track its progress against the complaint resolution requirements set out in this policy. We will notify you of our proposed resolution as soon as practicable.

Step 4: If necessary, escalate your complaint or dispute to the General Manager

If you are not satisfied with our proposed resolution to your complaint, or otherwise wish to make comments or ask questions about it, you can contact our customer service manager using the contact details set out above. If a satisfactory resolution still cannot be achieved, the customer service manager will refer your complaint to SmartBonds's General Manager.

Step 5: Refer the complaint to the relevant Financial Ombudsman

If, after our best efforts, we fail to provide you with a satisfactory resolution to your complaint, you can refer the complaint to the Financial Ombudsman of the State where you are located.

6. Review

This policy will be regularly reviewed to assess its performance and updated to ensure it complies with the relevant laws and statutes. A copy of this policy is available for download on our website www.smartbonds.com.au.