

Complaints Handling Policy

1. Purpose

ASA Funds Management Limited (ACN 079 538 499) (**ASAFM**) and its controlled or related entities (together, **ASA Group** or **ASA**) are committed to ensuring that its financial services are provided in a manner that is honest, efficient, fair and in compliance with all applicable laws. This includes ensuring that complaints from ASA's retail clients are handled efficiently and effectively.

2. Policy Application

This policy applies to complaints made:

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

3. What is a complaint?

A complaint is an expression (verbally or in writing) of dissatisfaction made to or about ASA, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or is legally required.

The following instances are not considered 'complaints' for the purpose of this policy:

- a general enquiry where no dissatisfaction is expressed;
- an expression of dissatisfaction about factors or issues which are outside the control of ASA (for example, general market conditions); or
- administrative queries (for example, enquiries on payments or distributions, lost or mislaid cheques),

unless raised in a way that the circumstances or number of claims indicate that there may be a systemic problem at ASA, in which case the query is a complaint.

Complaints do not need to be in writing and can be lodged through multiple methods, such as telephone, email, letter, social media, in person, or online.

ASA will endeavour to ensure that complaints are appropriately handled, and are not categorised as 'feedback' or an 'inquiry' or 'comment' merely because:

- the complainant expresses their dissatisfaction verbally;
- ASA considers the matter does not have merit; or
- a payment is made to the complainant to resolve the matter without any admission of error.

The following are examples expressions of dissatisfaction that are complaints:

- posts on a social media channel or account owned or controlled by ASA that meet the definition of 'complaint', where the complainant is identifiable and contactable; or
- complaints about a matter that is the subject of an existing remediation program or about the remediation program itself (such as about delays or lack of communication).

4. How to lodge a complaint

Complaints can be made in person, via post, email or by calling the toll-free investor number. A representative, including financial counsellors, legal representatives, family or friends, may lodge a complaint on behalf of a complainant.

Assistance will be provided if requested by the complainant and options to assist given by ASA where possible. ASA will proactively provide assistance to vulnerable people and groups making a complaint (for example, people with a disability or language difficulties).

5. Responding to complaints

Our approach

We take complaints seriously. In line with ASA's values, we will address complaints with respect, empathy and courtesy. We will assess each complaint through the objective processes set out in our Internal Dispute Resolution Protocol and will provide responses in accordance with the timeframes below.

Timeframes

ASA will deal with complaints in accordance with the following processes and timeframes:

- **Acknowledgement:** Complaints will be acknowledged within 24 hours or no later than one business day after the complaint is received.
- **Assessment and investigation:** All complaints will be investigated in an equitable, objective and unbiased manner in accordance with ASA's Internal Dispute Resolution Protocol.
- **Internal Dispute Resolution Response (IDR Response):** A written response on the final outcome of the complaint will be provided to the complainant within 30 calendar days of ASA receiving the complaint. In limited circumstances, ASA may provide the IDR Response in a period that is longer than 30 calendar days from the date of receipt of the complaint. In such cases, an IDR Delay Notification will be provided to the complainant informing the complainant about the reasons for the delay and their right and contact details to complain to the Australian Financial Complaints Authority (**AFCA**) if they are dissatisfied.

6. Accessing AFCA

If a complaint is not resolved within 30 calendar days, or if the complainant is dissatisfied with the outcome or handling of a complaint, the complainant can contact AFCA.

AFCA can be contacted at:

Website: www.afca.org.au

Email: info@afca.org.au

Telephone: 1800 931 678

Postal address: AFCA Service Complaints, Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001

7. Additional information

If you have any questions about this policy, please contact:

Email: investorservices@asarep.com

Telephone: +613 9221 6215

Postal address: Level 27, 101 Collins Street, Melbourne VIC 3000

8. Policy Review

This policy will be reviewed at least every two years or more regularly if there are changes to the legal or regulatory framework which applies to this policy to ensure it is working effectively and updated appropriately.

9. Policy Approval

This policy was approved by the Board of ASAFM on 16 September 2024.

10. Privacy

This policy should be read in conjunction with ASA's Privacy Policy.