



Schroders RF Limited

(ACN 089 265 270, AFSL No. 238546)

Complaints Handling Policy

Dated: 23 August 2021

Section 1 Overview

Schroders RF Limited (**Schroders RF**) considers that adequately dealing with complaints from its investors and borrowers is essential to the fair provision of financial services. We are committed to providing high quality services and products. As an organisation we value and respect the relationships we have with our borrowers and investors.

Schroders RF is committed to acting honestly and with integrity in all of our business interactions and expect our staff to do the same. A robust complaints handling policy is a key element to ensuring we meet our compliance and regulatory obligations.

The purpose of this Policy is to ensure that there is an appropriate and effective framework for the identification, management, escalation, resolution and reporting of complaints.

What does this Policy Cover?	
Item	Definition
Key Principles of the Complaints Handling Policy	Schroders RF is committed to the efficient and fair resolution of complaints.
Identifying a 'complaint'	Any expression of dissatisfaction made to or about Schroders RF, relating to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required. Note, this includes complaints posted on a social media channel owned by Schroders RF, where the author is identifiable and contactable.
Dealing with a complaint	Schroders RF will deal with a complaint within 21 days of receipt of the complaint, and provide a final determination within 30 days at the latest.
Complaints Handling Officer	Schroders RF has two designated Complaints Handling Officers, the Investor Complaints Handling Officer and the Borrower Complaints Handling Officer. The Investor Complaints Handling Officer is responsible for maintaining the Investor Complaints Register and for managing investor complaints in accordance with this Policy. The Borrower Complaints Handling Officer is responsible for maintaining the Borrower Complaints Register and for managing borrower complaints in accordance with this Policy.
Complaints Register	The Investor Complaints Handling Officer is responsible for maintaining an Investor Complaints Register which will be updated on receipt of a complaint from an investor and throughout the complaints resolution process, in accordance with this Policy. The Borrower Complaints Handling Officer is responsible for maintaining a Borrower Complaints Register which will be updated on receipt of a complaint from a borrower and throughout the complaints resolution process, in accordance with this Policy.

Section 2 Key principles for complaints handling

Schroders RF strives to ensure that due care and utmost diligence is applied in the design of its products and the provision of services to its borrowers and investors. We recognise that complaints do arise. Moreover, complaints provide both improvement opportunities and insights into borrowers' and investors' expectations.

The principles that Schroders RF will abide by when handling a complaint are as follows:

- (i) Schroders RF is committed to the efficient and fair resolution of complaints (in this context 'fairness' means fairness to both the complainant and the person complained about).
- (ii) Schroders RF is committed to ensuring its complaints handling process is adequately resourced.
- (iii) Schroders RF appoints designated Complaints Handling Officers who will have responsibility for logging complaints in the Complaints Register and for managing and resolving complaints.
- (iv) Borrowers and investors are informed of our Complaints Handling Policy which is made available to them.
- (v) Schroders RF employees are required to follow this Policy and will take reasonable steps to ensure employees comply with this Policy.
- (vi) Schroders RF aims to deal with complaints quickly and courteously.
- (vii) The Complaints Handling Officer, in consultation with the Schroders RF CEO, has the capacity to determine and implement remedies to complaints/disputes. However, where the resolution of a complaint/dispute has financial implications, the Complaints Handling Officer will consult and seek approval from the Schroders RF CEO.
- (viii) Complaints data is collected and recorded in a Complaints Register which sets out all the required information to be collected in relation to a complaint.
- (ix) Complaints are reviewed by the Compliance Officer on a quarterly basis and reported to the Board so that systemic or recurring problems are identified and rectified.
- (x) Any queries about this Policy should be directed to the Compliance Officer.

This policy is to be read in conjunction with the Schroders RF Privacy Policy which also refers to complaints handling procedures in regards to privacy matters and data breach incident reporting.

Section 3 What is a Complaint?

Schroders RF considers a complaint to be any expression of dissatisfaction with a product or service offered or provided by it, its staff or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected or legally required. A complaint differs to an "enquiry" which tends to be a request for information about a product or service provided by Schroders RF. An enquiry is a factual request and does not reflect dissatisfaction.

Where there is any doubt whether or not a communication received either verbally or in writing constitutes a complaint, the matter must be reported to the Compliance Officer, who will make further investigations and determine it to be a complaint or otherwise.

Regardless of the nature of the borrower or investor's complaint, there should be a positive and respectful attitude and a commitment to having the complaint resolved as soon as practicable.

Section 4 Dealing with a Complaint

All complaints whether written or verbal must be communicated to the Complaints Handling Officer immediately, or as soon as practicable, on receipt of a complaint.

If a Schroders RF employee or representative receives a complaint from a borrower or investor:

- (i) they must record all relevant details and immediately escalate the complaint to the Complaints Handling Officer;
- (ii) the Complaints Handling Officer must record details of the complaint in the Complaints Register;
- (iii) the Complaints Handling Officer must acknowledge receipt of the complaint either via a return phone call, email or letter;
- (iv) the Complaints Handling Officer must ensure the complaint receives proper consideration; and
- (v) the Complaints Handling Officer must use reasonable endeavours to deal with and resolve the complaint.

Responsibility for acknowledging complaints in the first instance rests with the Complaints Handling Officer. All complaints (whether verbally or in writing) will be acknowledged within 24 hours of receipt of the complaint as required in the forthcoming ASIC guidelines.

Subject to the nature of the complaint, Schroders RF will try to resolve the complaint to the borrower or investor's satisfaction as soon as possible. While most matters can be resolved quickly, more complex issues may take longer.

Schroders RF aims to resolve complaints within 21 days. If Schroders RF is unable to resolve the complaint to the borrower or investor's satisfaction, Schroders RF will communicate the following items to the complainant as soon as practicable, no later than 30 days after Schroders RF received the complaint:

- (i) the determination in relation to the complaint (either confirmation of actions taken by Schroders RF to fully resolve the complaint or reasons for rejection or partial rejection of the complaint);
- (ii) the investor or borrower's right to take the complaint to the Australian Financial Complaints Authority (**AFCA**); and
- (iii) contact details for AFCA.

NB: The 30-day timeframe to provide a final response does not recommence where new information is provided in respect of the complaint.

All complaints must be recorded in the Complaints Register, which will capture, as a minimum the following information:

- (i) Date when the complaint was received
- (ii) Complainant's name
- (iii) Recipient of the complaint
- (iv) Fund Name/product to which the complaint relates
- (v) Nature of the complaint
- (vi) Summary of the complaint, including method of receipt
- (vii) Summary of the final response
- (viii) Final outcome, including dates
- (ix) Date complaint closed

Refer to section 6 for what happens if we are unable to resolve the complaint.

Section 5 Monitoring and Reporting of Complaints

The Schroders RF CEO and the appointed Complaints Handling Officer are responsible for maintaining the Complaints Register and for periodically monitoring it to ensure any issues or concerns are being escalated and addressed in a timely manner.

The Compliance Officer will ensure that a copy of the Complaints Register is presented to the relevant entity Board on a quarterly basis, so that systemic or recurring problems are identified and rectified.

It is important to note that some complaints may constitute or reveal a breach or incident, which must then also be dealt with under the Incident and Breach Policy and logged in the Incident and Breach Register.

Section 6 Dispute Resolution

If you have a complaint about the service provided by Schroders RF, you should contact Schroders RF's Complaints Handling Officer:

By phone: +61 2 9954 2211

By email: complaints@schrodersrf.com

By writing: Complaints Handling Officer
Schroders RF Limited
PO Box R1297
Royal Exchange NSW 1225

The complaint will be forwarded to the Investor Complaints Handling Officer or the Borrower Complaints Handling Officer, depending on the nature of the complaint.

If an issue has not been resolved to your satisfaction, you can lodge a complaint with the AFCA of which we are a member. AFCA provides fair and independent financial services complaint resolution that is free to consumers.

AFCA has authority to hear certain complaints. Contact AFCA to confirm if they can assist you.

Time limits may apply to complain to AFCA and so you should act promptly or otherwise consult the AFCA website to find out if or when the time limit relevant to your circumstances expires.

You can contact AFCA:

By phone: 1800 931 678 (free call)

By email: info@afca.org.au

By writing: Australian Financial Complaints Authority,
GPO Box 3
Melbourne VIC 3001

By visiting: www.afca.org.au