

Complaints Handling Policy

September 2025



Section 1 Overview

Corval Avenue Limited (**Corval Avenue**) 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.

Corval Avenue 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	Corval Avenue is committed to the efficient and fair resolution of complaints.
Identifying a 'complaint'	<p>Any expression of dissatisfaction made to or about Corval Avenue, 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.</p> <p>Note, this includes complaints posted on a social media channel owned by Corval Avenue, where the author is identifiable and contactable.</p>
Dealing with a complaint	Corval Avenue 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	Corval Avenue 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.
Monitoring and Reporting – Internal and Regulatory Reporting	<p>The Corval Avenue Compliance Officer and the nominated Complaints Handling Officers are responsible for monitoring and maintaining the Complaints Registers. The Compliance Officer ensures the Complaints Register is presented to the Board quarterly.</p> <p>Corval Avenue is also required to submit complaints information to ASIC on a six-monthly basis in the required format to comply with its IDR data reporting obligation.</p>

Section 2 Key principles

Corval Avenue 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. However, we recognise that complaints do arise. Complaints provide both improvement opportunities and insights into borrowers' and investors' expectations.

The principles that Corval Avenue will abide by when handling a complaint are as follows:

1. Corval Avenue 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).
2. Corval Avenue is committed to ensuring its complaints handling process is adequately resourced.
3. Corval Avenue appoints designated Complaints Handling Officers who will have responsibility for logging complaints in the Complaints Registers and for managing and resolving complaints.
4. Borrowers and investors are informed of our Complaints Handling Policy which is made available to them.
5. Corval Avenue employees are required to follow this Policy and will take reasonable steps to ensure employees comply with this Policy.
6. Corval Avenue aims to deal with complaints quickly and courteously.
7. The Complaints Handling Officer, in consultation with the Compliance Officer, 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 Corval Avenue Chief Executive Officer.
8. 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.
9. 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.
10. Any queries about this Policy should be directed to the Compliance Officer.

This policy is to be read in conjunction with the Corval Avenue 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?

Corval Avenue 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 Corval Avenue. 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 Corval Avenue employee or representative receives a complaint from a borrower or investor:

1. They must record all relevant details and immediately escalate the complaint to the Complaints Handling Officer;
2. the Complaints Handling Officer must record details of the complaint in the Complaints Register;
3. the Complaints Handling Officer must acknowledge receipt of the complaint either via a return phone call, email or letter;
4. the Complaints Handling Officer must ensure the complaint receives proper consideration; and
5. 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 received 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, Corval Avenue 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.

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

1. the determination in relation to the complaint (either confirmation of actions taken by Corval Avenue to fully resolve the complaint or reasons for rejection or partial rejection of the complaint);
2. the investor or borrower's right to take the complaint to the Australian Financial Complaints Authority (AFCA); and
3. 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:

1. Date when the complaint was received
2. Complainant's name
3. Recipient of the complaint
4. Fund Name/product to which the complaint relates
5. Nature of the complaint
6. Summary of the complaint, including method of receipt
7. Summary of the final response
8. Final outcome, including dates
9. Date complaint closed.

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

Section 5 Monitoring & reporting

INTERNAL REPORTING

The Compliance Officer 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.

REGULATORY REPORTING

On a six-monthly basis, Corval Avenue as the Responsible Entity of the registered scheme/s is required to give internal dispute resolution (IDR) information to ASIC in relation to any complaints received between the reporting period:

- 1 January to 30 June each year and;
- 1 July to 31 December each year

Reporting to ASIC will be required in a prescribed template format and lodgement will be required to be made via the ASIC Regulatory Portal. These submissions must be made within two months after the end of a reporting period.

If there are no complaints for which Corval Avenue is required to give ASIC IDR information for a reporting period, Corval Avenue must give ASIC a confirmation that it did not have any complaints for that reporting period. This must be submitted through the ASIC Regulatory Portal.

Corval Avenue's IDR reporting obligation commences on 1 January 2024, covering the six-month reporting period between 1 July to 31 December 2023. Once reporting commences, the obligation to submit an IDR report to ASIC for every reporting period is ongoing.

Section 6 Dispute resolution

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

- By phone: +61 2 9954 2211
- By email: complaints@corvalavenue.com
- By writing: Complaints Handling Officer
Corval Avenue 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

Section 7 Policy ownership & review

This policy is owned by the Compliance Officer and must be reviewed every two years.

Version No. & Date	Changes from Prior Version	Approved By
1.0 (August 2021)	Document creation	Board
2.0 (June 2023)	Review and update for ASIC IDR data reporting	Board (27/9/23)
3.0 (September 2025)	Review and update for change of name and re-format of policy.	Compliance Officer (8/9/25)

Appendix 1

ASIC prescribed template reporting (data collection)

Number	Data Element	Description	Permissible Values	Completion Requirements	Codes
1	Financial Firms complaint identifier number	Financial Firms complaint identifier number	Alpha-Numeric	Compulsory to complete (cannot use the same identifier twice)	Company prescribed
2	Name of Product	Name of Product the complaint is about	Example: Corval Avenue Select Credit Fund		Company prescribed to the name of the registered scheme
3	Complaint Type	Who made the complaint	Numeric Only	Code definitions 1= Individual or couple 2= Small business 3 = Other (for trusts, SMSF Trustees, executors, large businesses, and any other complainants that are neither an individual or couple nor a small business) 9= Unknown if the complainant is unknown.	ASIC prescribed
4	Complainant Gender	Gender of the person raising the complaint	Numeric Only	Code definitions 1= Male 2= Female 3= Non-binary 9= Unknown	ASIC prescribed
5	Complainant Age	The complainants age at their last birthday	Numeric Only	Code definitions: 1= less than 18 years 2= 18-24years 3= 25-34 years 4= 35-44 years 5=45-54 years 6= 55-64 years 7= 65-74 years 8= 75 years and over 9=Unknown	ASIC prescribed

6	Complainant Postcode	The complainant's postcode	Alpha-numeric	Compulsory to complete	Company prescribed
7	Complaint Status	The status of the complaint at the end of the reporting period	Numeric Only	Code definition 1= Open – if the complaint is open and its resolution is in progress 2=Closed – if the firm has provided a final IDR response to the complainant, or if (within 5 business days of receiving the complaint) the complaint has been resolved to the complainant's satisfaction or the firm has given an explanation and/or apology when it can take no further action to reasonably address the complaint.	1=Open 2=Closed
8	Complaint Channel	Through which channel was the complaint first received	Numeric Only	Code definition 1=Face to face 2=Phone 3=Email 4=Web chat 5=Online form 6=Social media 7=Referral from AFCA	ASIC prescribed
9	Date received	The date the firm first received the complaint	Date	Date must be presented DD/MM/YYYY	Company prescribed
10	Date closed	The date the complaint was closed	Date	Financial firms must complete this data element if data element 7 "Complaint Status" equals 2 (Closed). Otherwise leave blank. Date must be presented DD/MM/YYYY	Company prescribed
11	Number of days taken to resolve the complaint	The number of days taken to resolve the complaint	Numeric Only	Optional Field Financial firms may elect to submit a response if data element 7 'Complaint status' is closed. If so count the calendar days, but do not include the first day the complaint was received. A complaint opened and closed on the same day is 0.	Not applicable.
12	Is the complaint about an Authorised Representative of the AFSL Holder	Confirm if the complaint is in relation to an AR	Numeric Only	Code definitions 1=Yes 2=No 3=Unknown	ASIC prescribed

13a	Product or service	The product or service that the complaint is about	Numeric Only	<p>Financial Firms must complete this data element.</p> <p>Record the product or service the complaint is about. If it is in relation to multiple products or services – use additional data fields 13b and 13c.</p> <p>Product and service definitions are in the IDR data glossary see Section C of ASIC's IDR Data Reporting Handbook.</p> <p>Suggested:</p> <p>99 = Mortgage schemes</p> <p>104=Other managed investments</p>	<p>ASIC prescribed</p> <p>See Table 10 of ASIC's IDR Data Reporting Handbook</p>
14a	Complaint Issue	The issue raised by the complainant	Numeric only	<p>Financial firms must record this data.</p> <p>Record the issue raised by the complaint. If it is in relation to multiple issues – use additional data fields 14b and 14c.</p> <p>Complaint issue definitions are in the IDR data glossary see Table 17 of ASIC's IDR Data Reporting Handbook.</p> <p>Suggested:</p> <p>58=Interpretation of product terms and conditions</p> <p>69= Investment Performance</p>	<p>ASIC prescribed See Table 17 of ASIC's IDR Data Reporting Handbook</p>
15a	Complaint outcome	The outcome of the complaint	Numeric only	<p>Financial firms must complete this data element if data element 7 'Complaint status' equals 2 (closed). Otherwise leave blank.</p> <p>Complaint outcome definitions are provided in the IDR data glossary: Section C of ASIC's IDR Data Reporting Handbook.</p> <p>Code definitions:</p> <p>1=Service based remedy</p> <p>2=Monetary remedy</p> <p>3=Contract/policy variation</p> <p>4=Decision changed</p> <p>5=Other remedy</p> <p>6=Withdraw/discontinued</p> <p>7= Referred to another financial firm</p> <p>8=No remedy provided/apology or explanation only</p>	<p>ASIC prescribed See Table 18 of ASIC's IDR Data Reporting Handbook</p>
16	Monetary remedy	Dollar value of monetary remedy provided	Alpha Numeric	<p>Financial firms must complete this data element if any of the data elements at 15a 'Complaint Outcome' equals 2 (Monetary remedy). Otherwise leave blank.</p>	<p>Company prescribed</p>

