

VJ RYAN & CO

ABN 55 704 784 107

VJ RYAN & CO SERVICES PTY LIMITED

ABN 41 003 275 189

VJ RYAN SECURITIES LIMITED

ABN 75 075 473 979

**INTERNAL DISPUTE RESOLUTION POLICY
(PROFESSIONAL STAFF INFORMATION STATEMENT)**

This document sets out the policy of VJ Ryan & Co, VJ Ryan & Co Services Pty Limited and VJ Ryan Securities Limited (“VJ Ryan”) to receiving, acknowledging, responding, resolving and recording complaints concerning VJ Ryan (including its directors, partners, staff, products and services). VJ Ryan is committed to efficiently and fairly resolving complaints. All staff are directed to willingly receive complaints whether by clients, unitholders or members of the public and apply this policy to such complaint. We must endeavour to ensure all complaints are resolved promptly with a resolution mutually acceptable to both VJ Ryan and the complainant.

Any staff members who are unsure about their obligations or who require clarification of anything contained in this policy should speak to the Compliance Officer.

1 Fairness

VJ Ryan will endeavour to resolve complaints fairly to both the complainant and VJ Ryan. The complainant will generally have a right to:

- (a) be heard;
- (b) be informed of the process that will be applied to resolve the complaint;
- (c) be informed of the decision of VJ Ryan in response to the complaint and the reasons for the decision;
- (d) internal review of the complaint by directors/partners/staff who are not the subject of the complaint;
- (e) if requested, have their complaint dealt with confidentially and
- (f) be informed of any avenue for appeal or further review.

2 Information for clients and members of the public

An information sheet on this policy (the VJ Ryan Internal Dispute Resolution Policy (General Information Statement)) is available for clients, unitholders and members of the public. You must willingly provide a copy of the information sheet to a client, unitholder or member of the public upon request (without charge). The information sheet is available at www.vjryancmt.com.au. This complaints

policy is also summarised in the combined Financial Services Guide/Product Disclosure Statement for the V J Ryan Cash Management Trust also available from the website.

3 Process

You must willingly receive a complaint. A complaint may be made in person or by letter, facsimile, e-mail or telephone. All written complaints should be referred to the Compliance Officer. (All references to Compliance Officer in this document should be read as referring to a director or partner of VJ Ryan who is not the subject of the complaint if the complaint concerns the Compliance Officer.)

You must provide all reasonable assistance to a person seeking to make a complaint. You must not demand that a complaint be in writing.

3.1 Receiving oral complaints

If a person seeks to provide a complaint in person or by telephone, you should:

- (a) identify yourself. If you do not consider it appropriate that you receive the complaint or the complaint is of a general nature and the complainant is not a client for whom you are responsible, you should refer the complainant to the Compliance Officer.
- (b) encourage and allow the complainant the opportunity to express their concern.
- (c) record details including:
 - (i) the name and contact details of the complainant
 - (ii) the relationship of the complainant to VJ Ryan
 - (iii) the nature of the complaint
 - (iv) what the complainant wants
 - (v) what you consider would be an appropriate response/remedy
 - (vi) any agreed remedy
- (d) confirm the details received.
- (e) empathise with the complainant in a courteous manner.
- (f) do not attempt to lay blame, be defensive or argue.
- (g) if you conclude that the complaint is of a minor nature and that an appropriate response can be provided promptly at minimal cost, resolve the complaint. If not, inform the complainant that the complaint will receive prompt attention.

3.2 *Informing Compliance Officer*

You must promptly inform the Compliance Officer in writing of details of all complaints (including those details specified above). You must comply with all directions of the Compliance Officer concerning a complaint.

3.3 *Responding to a complaint*

You may orally discuss a complaint with a complainant (unless the complainant requests otherwise). However:

- (a) A copy of the VJ Ryan Internal Disputes Resolution Policy (General Information Statement) and a written acknowledgement of receipt must be forwarded to the complainant within 2 business days of receiving the complaint.
- (b) A letter confirming the response to/remedies provided in response to a complaint should be forwarded to the complainant within 10 business days of receiving the complaint.

The Compliance Officer must be provided with a copy of all such documents.

4 Confidentiality

If a complainant requests that a complaint remain confidential, you should inform the complainant that you are required to disclose the complaint to the Compliance Officer. You should disclose the complaint to the Compliance Officer. Otherwise, you should comply with the request and not disclose the complaint except with the prior consent of the complainant.

5 Charges

You must not charge complainants a fee for lodging a complaint or responding to/resolving a complaint.

6 Remedies

All remedies and responses to a complaint should be fair and reasonable to the complainant and VJ Ryan. To the extent possible, you should discuss possible remedies and responses with the Compliance Officer. The remedies may include:

- (a) an apology
- (b) provision of further information
- (c) refund of amounts paid
- (d) payment of compensation
- (e) provision of goods or services

7 Review and appeal

A complainant may refer a complaint to the Financial Ombudsman Service Limited. Their address is GPO Box 3, Melbourne, Victoria, 3001 and their call centre free telephone number is 1300 780 808.

The Compliance Officer will refer a complaint for independent assessment or for external dispute resolution if the Compliance Officer is unable to achieve a satisfactory resolution of the complaint within 10 business days.

8 Resources

VJ Ryan is committed to ensuring sufficient resources are allocated to ensure compliance with this policy. If you consider you require any resources, please speak to the Compliance Officer.

9 Records

If a complainant is a client or unitholder, you must record and retain details of a complaint. If the complainant is not a client or unitholder, relevant documents should be forwarded to the Compliance Officer. The Compliance Officer will maintain records of all complaints in a complaint register (see Attachment A).

Reports of complaints will be regularly distributed to directors and partners of VJ Ryan.

10 Systematic and recurring problems

The Compliance Officer will review the complaints register quarterly in order to identify and resolve and minimise systematic and recurring problems identified from complaints.

11 Accountability

Complaints will be considered in performance reviews and goal setting for all directors, partners and staff.

12 Questions

If you have any questions, please contact the Compliance Officer.