



## Change Financial Complaints Handling Policy V1.2

### Overview

At Change Financial, we are committed to providing quality services and maintaining strong relationships with our clients, customers and stakeholders in both Australia and New Zealand.

The Corporations Act 2001 in Australia requires financial service providers to have a dispute resolution system, including both internal dispute resolution (IDR) procedures and membership in an external dispute resolution (EDR) scheme. Similarly, the Financial Service Providers (Resolution and Dispute Resolution) Act 2008 (FSP Act 2008) in New Zealand requires financial service providers who provide services to retail clients to join an approved dispute resolution scheme. This Complaints Handling policy outlines our approach to managing and resolving complaints received from retail clients. By adhering to this policy, we aim to:

- Ensure that all complaints are handled consistently and resolved quickly
- Provide a clear and accessible process for individuals to raise their concerns
- Identify emerging issues and enhance product and service delivery
- Improve levels of consumer confidence and satisfaction

The purpose of this policy is to outline the requirements set by Australian Securities and Investments Commission (ASIC) and New Zealand Financial Market Authority (FMA), and to provide a clear and structured approach to handling complaints from consumers. This policy is designed to comply with ASIC's Regulatory Guide 271 Internal Dispute Resolution (RG271), 267 Oversight of the Australian Financial Complaints Authority (RG267) and New Zealand FSP Act 2008 requirements.

### Scope

This policy applies to complaints made in relation to Change Financial, including both Change Financial Payment Services Pty Ltd (CFPS) and Change Labs NZ Pty Ltd (CLNZ).

Change Financial Payment Services Pty Ltd (CFPS) is an Australian Financial Services Licensee:

- AFSL Number 534901
- ABN 92 651 106 955

Change Labs NZ Pty Ltd (CLNZ) is a Financial Services Provider (FSP) in New Zealand:

- FSP Number 1002611
- NZBN 942 904 868 2916

This policy covers all employees, contractors and representatives of Change Financial, as well as any individuals or entities interacting with our services in Australia and New Zealand.

## Definitions of Key Terms

Complaint - means both 'complaints' and 'disputes'

Complainant – a person or entity making a complaint or raising a dispute

IDR – Internal Dispute Resolution

Resolution – the outcome or decision made in response to a complaint

## What is a complaint?

A complaint is:

*“An expression of dissatisfaction made to or about us; related to our products, services, staff or our handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required”.*

## What is a retail client?

The ASIC Internal Dispute Resolution (IDR) requires Change Financial to address complaints from retail clients. Whether one is classified as a retail client depends on a range of factors, including:

- The nature of the financial product or service
- The value of the financial product or service
- Whether you qualify as a small business
- Your experience, qualifications or status as a professional investor in financial product or service
- Your individual wealth

Retail clients include small businesses (under the Corporations Act 2001 section 761G and for IDR purposes only). A 'small business' is one that, at the time the financial services were provided, had:

- fewer than 100 employees for manufacturing businesses
- fewer than 20 employees for non-manufacturing businesses

In New Zealand, a retail client is defined as any person who receives a financial service and is not classified as a wholesale client. Retail clients typically include individual consumers who use financial services for personal, family or household purposes. Wholesale clients typically include entities or individuals with significant financial experience or resources, such as financial service providers, large businesses, or professional investors.

## How to make a complaint

You can make a complaint to us in any of the following ways:

### Australia

<b>Telephone</b>	+61 3 9661 8208
<b>Email</b>	Complaintsofficer@changefinancial.com
<b>Writing</b>	Complaints Officer Client Operations Team Change Financial Payment Services Pty Ltd Suite 3E, Level 3, 340 Adelaide Street Brisbane QLD 4000

### New Zealand

<b>Telephone</b>	+61 3 9661 8208
<b>Email</b>	Complaintsofficer@changefinancial.com
<b>Writing</b>	Complaints Officer Client Operations Team Change Labs NZ Pty Ltd Level 2, 22 Fanshawe Street Auckland 1010

When making a complaint please provide the following information:

- name and contact details of the complainant;
- if you are contacting us on a complainant's behalf, your role or authority to act on their behalf;
- how you wish us to contact you (for example, by phone, email);
- what your complaint is about;
- copies of any documentation supporting the complaint; and
- what you are seeking to resolve your complaint.

Change Financial will take reasonable steps to support complainants who may require additional assistance, including vulnerable customers.

## How we will deal with your complaint

### Acknowledgement

We will acknowledge receipt of your complaint and try to resolve it as quickly as possible.

Generally, where your complaint is made:

- Verbally – we will acknowledge your complaint in the same manner and, in writing, within three (3) business days, or as soon as practicable;
- In writing – by email, we will acknowledge your complaint, within three (3) business days or as soon as practicable thereafter.

### Investigation of your complaint

If we are unable to resolve your complaint immediately, we will take necessary steps to investigate the matters raised in your complaint.

All complaints are recorded and monitored to identify systemic issues, emerging risks and opportunities for process improvement.

We may also request that you provide us with further information to assist with our investigation.

### **Notify you of the outcome (IDR Response)**

We will provide you with written reasons for the outcome of your complaint (“IDR Response”) within the following timeframes or if you request a written response:

<b>Standard complaints</b>	<b>No later than 15 business days after receiving your complaint</b>
<b>Complex complaints</b>	<b>No later than 30 calendar days after receiving your complaint</b>

We will not provide you with a written response (IDR Response) if:

- your complaint is resolved to your complete satisfaction within 10 business days, and you have not requested an IDR Response; or
- within 10 business days of receiving your complaint, we have given you an explanation and/or apology in circumstances where we cannot take any further action to reasonably address your complaint.

If we reject your complaint (either in whole or in part), our IDR Response will:

- identify and address the issues you raised in your complaint;
- set out our findings on the material questions of fact raised in your complaint, making reference to the relevant supporting information; and
- provide adequate detail in order for you to understand the reasons for our decision so that you can decide whether to escalate the complaint to external dispute resolution.

Our IDR Response will also inform you of your right to escalate your complaint to an external dispute resolution body. These external dispute resolutions bodies offer free and independent dispute resolution services for financial complaints to individuals and small businesses.

### **Delay in providing an IDR Response**

If we are not able to provide our IDR Response to you on time, we will write to you to explain the reasons for the delay. Our written notification will:

- (a) explain the reason for the delay;
- (b) provide an updated expected timeframe for resolution; and
- (c) inform you of your right to escalate your complaint to **Australian Financial Complaints Authority (AFCA)** (Australia) or **Financial Dispute Resolution Service (FDRS)** (New Zealand).

Where the delay is due to a third-party process outside of our control, such as a card scheme investigation by Mastercard, this will be clearly explained.

## Other Obligations

Where a complaint identifies a potential breach, privacy incident (including identity verification or DVS-related incidents), fraud event or systemic issue, the matter may also be escalated in accordance with Change Financial's Breach Reporting Policy, Privacy Breach Reporting Procedures and other applicable compliance frameworks.

## Escalating your complaint

If you are not satisfied with our response to your complaint, you can escalate it to the appropriate external dispute resolution body, depending on where you received the service. In Australia, contact AFCA. In New Zealand, contact FDRS.

### AFCA

Change Financial Payment Services Pty Ltd is a member of the AFCA. AFCA is an external dispute resolution scheme which provides a free and independent service. Our membership number is 93185.

You can contact AFCA using the following details:

- Email: [info@afca.org.au](mailto:info@afca.org.au)
- Phone: 1800 931 678 (or +61 1800 931 678 if calling from overseas)
- Online: [www.afca.org.au](http://www.afca.org.au)
- Mail: GPO Box 3, Melbourne, VIC, 3001.

### FDRS

Change Labs NZ Pty Ltd is a member of the FDRS. FDRS is an external dispute resolution scheme which provides a free and independent service. Our membership number is FM6360.

You can contact FDRS using the following details:

- Email: [enquiries@fdrs.org.nz](mailto:enquiries@fdrs.org.nz)
- Phone: 0508 337 337
- Online: [www.fdrs.org.nz](http://www.fdrs.org.nz)
- Mail: Freepost 231075, PO Box 2272, Wellington 6140