



Internal Dispute Resolution (IDR) Process and Procedure

INTERNAL DISPUTES RESOLUTION PROCESS

1: Introduction:

An Internal Dispute Resolution process has been established in accordance with the Australian Credit Licencing (ACL), Credit Ombudsman Services Ltd (COSL) and Mortgage Finance Association of Australia (MFAA) requirements. The IDR Process is a training and guidance tool to assist staff with any enquiries.

2: What are Internal Dispute Resolution Procedures?

Internal Dispute Resolution ("IDR") is a process about how a Consumer can make a complaint to Firstfolio prior to lodging a complaint with an external organisation. This mechanism provides Firstfolio with an opportunity to resolve any issue with the complainant prior to external escalation. These procedures also provide guidance on how to respond to a complaint and help clarify our responsibilities.

3: Who can make use of these IDR Procedures?

Any Consumer who interacts with Firstfolio may use the IDR Process.

4: Complaints Contact person.

4.1: Firstfolio will appoint a Complaints Contact Person who must be:

- a director or other officer or senior employee of Firstfolio.

4.2: Firstfolio must appoint as Complaints Contact Person a person who:

- has sufficient experience in relation to the business and products so as to adequately understand a Consumer's complaint; and
- Has authority from Firstfolio to make decisions about a Consumer's complaint which are binding on Firstfolio.

4.3: Firstfolio must ensure that at all times there is one or more deputy Complaints Contact Person who meets the criteria for appointment of Complaints Contact Person as stated above and who is able to act in place of the Complaints Contact Person as may be required in particular circumstances.

5: Awareness of IDR Procedures.

5.1 Firstfolio must ensure that at all times all staff that deal with, or are likely to deal with, a Consumer are aware of the name, title and telephone number of Complaints Contact Person and each deputy Complaints Contact Person.

5.2 Firstfolio must ensure that each staff Member who deals, or is likely to deal with, a Consumer is given a written instruction:

- about how to transfer a Consumer who has a complaint to the Member's Complaints Contact Person or deputy Complaints Contact Person; and

- What customer details to record if the Member's Complaints Contact Person or deputy Complaints Contact Person is for any reason unavailable (this information to include as a minimum the Consumer's name, telephone number and description of the product or transaction to which the Consumer's complaint relates.

6: How does a consumer make a complaint?

- 6.1 The complaint need not be in writing and may be presented to Firstfolio by any reasonable means, for example letter, telephone, fax, in person or email.
- 6.2 Firstfolio must not charge any fee in respect of the complaint.
- 6.3 All Litigation in relation to the complaint must be suspended until the complaint has been investigated and responded to by the IDR Contact Person.

7 Investigating your complaint

- 7.1 Your complaint must not be investigated by the Complaints Contact Person or deputy Complaints Contact Person who is involved in the subject matter of the complaint.
- 7.2 The Complaints Contact Person or deputy Complaints Contact Person must have the consumer's written authority to access any and all documents and records of information (including computer systems) as may be necessary to properly investigate the complaint.

8 Timeliness

- 8.1 Firstfolio must provide a written acknowledgement of receipt of the complaint promptly, unless your complaint is otherwise resolved in the meantime.
- 8.2 Firstfolio must ensure that a substantive response is given to the complaint as soon as possible, but within forty five (45) days after receipt of it.
- 8.3 If we cannot respond to the complaint within forty five (45) days, we must inform the customer of the reasons for the delay and of their right to refer the complaint to the Credit Ombudsman.
- 8.4 Firstfolio will have substantively responded to the complaint if:
- It accepts the complaint and, if appropriate, offers redress; or
 - offers redress without accepting the complaint; or
 - Rejects the complaint.

9 Written response to the Complainant

- 9.1 Firstfolio must give a written response to the complaint and must give reasons for reaching a particular decision on the complaint that adequately address the issues that were raised in the complaint. Where practicable, the response must refer to applicable provisions in legislation, Codes, Standards or Procedures.

10 Remedies

- 10.1 Where Firstfolio accepts the complaint and is of the view that it is appropriate to offer redress to the customer, that redress may be non-financial as well as, or instead of, financial. If we consider a financial remedy is appropriate then we should give the customer compensation for any direct loss that they may have suffered.
- 10.2 When determining the appropriate remedy to be given to the customer and the extent of loss or damage suffered by the customer, we will consider relevant legal principles, recognized Codes of Practice, concepts of fairness and good practice in the Credit Industry.

11 Consumer Awareness of Firstfolio's IDR Process

- 11.1 If it is possible in the initial correspondence with a Consumer, we should always provide the IDR Complaints Person contact details.
- 11.2 The Firstfolio web site must provide details of the name and postal addresses, contact telephone numbers, fax numbers and email addresses of the Complaints Contact Person.

12 Referring a complaint to IDR

- 12.1 Firstfolio staff are required to email or forward an IDR complaint to the Complaints Contact Person or deputy Complaints Contact Person to provide such assistance to a Consumer as may be reasonable in the circumstances to enable that Consumer to make a complaint.

13 Data Collection

- 13.1. A Complaints register and data concerning consumer complaints is to be maintained to enable analysis according to:
- type of complainant;
 - subject of complaint;
 - outcome of complaint;
 - Timeliness of response.
- 13.2 To enable identification of any systemic problems.

14 Review

Firstfolio will review its Internal Dispute Resolution Procedures annually to ensure that its complaints systems are operating effectively.