

Peninsula Mutual Limited
(The Mutual)
ACN 630 256 478
AFSL 544 232

Complaint and Dispute Resolution Policy

1 JULY 2024

INTRODUCTION

Purpose

The purpose of Peninsula Mutual Limited's ("the **Mutual**") Complaint and Dispute Resolution Policy ("**Policy**") is to ensure Member Complaints in respect of Peninsula Protect are dealt with promptly, fairly and consistently.

This Policy represents the Mutual's and Peninsula Pty Ltd's ("**Peninsula**") commitment to effective and efficient Complaints handling and to fair and transparent dealings, and to ensure all complaints are escalated to the Mutual as the holder of AFSL 544232 to be managed and reported to ASIC as required in accordance with RG 271.

The standards and requirements set out in the ASIC Corporations, Credit and Superannuation (Internal Dispute Resolution) RG 271 as outlined in this Policy are enforceable.

This policy will have effect from 5 October 2021.

Policy Statement

The Mutual must have an Internal Dispute Resolution ("**IDR**") system that consists of:

- 1) an Internal Dispute Resolution ("**IDR**") process that complies with the standards and requirements made or approved by ASIC that covers Complaints made by Retail Members in relation to the financial services provided; and
- 2) Membership of AFCA.

The benefits of effectively resolving Members' Complaints through an IDR system with broad coverage include:

- a) the opportunity to resolve Complaints quickly and directly;
- b) the promotion of trusted relationships between The Mutual and its Members;
- c) improved levels of Members' confidence and satisfaction;
- d) a greater understanding of the key drivers of Complaints;
- e) the ability to identify emerging issues and inform product and service delivery improvements; and
- f) reduced AFCA fees and future remediation costs.

The Mutual takes a proactive approach to identifying and resolving Complaints. It is better for the Mutual and its Members that a Complaint is dealt with at the earliest possible stage because it:

- a) prevents Complaints from becoming entrenched;
- b) preserves Member relationships;
- c) is often the most efficient and cost-effective way for an organisation to deal with Complaints; and
- d) may improve customer satisfaction.

When reviewing and establishing this Policy, the Mutual has taken into account:

- a) the size of its business and the number of people in the organisation;
- b) the products and services offered and the volume and size of transactions the Mutual is responsible for;
- c) the nature of its Member base;
- d) the diversity and structure of its operations; and
- e) the likely number and complexity of Complaints.

Aims

This Policy aims to resolve minor Complaints during the Member's initial contact with Peninsula and the Mutual.

To acknowledge all Complaints, however received, within 24 hours or one business day.

To action all other Complaints, however received, within fifteen (15) calendar days of them being received.

To resolve all Complaints and provide an IDR response no later than thirty (30) calendar days after receipt of a Complaint.

Definitions

AFCA means the Australian Financial Complaints Authority, an Australian Securities and Investments Commission (“**ASIC**”) approved EDRS.

Member means any Retail Client or Small Business Client who has joined the Mutual through Membership of The Mutual.

Complaint means an expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a Complaint, where a response or resolution is explicitly or implicitly expected or legally required.

Corporations Act means the *Corporations Act 2001* (Cth).

EDRS means External Dispute Resolution Scheme.

IDR means Internal Dispute Resolution.

IDR Delay Notification means written correspondence provided to the Complainant advising them their Complaint will not be resolved within thirty (30) calendar days.

IDR Response means a written response to the Member informing them of:

- a) the final outcome of their Complaint at IDR (including either confirmation of actions taken by The Mutual to fully resolve the Complaint or reasons for The Mutual’s rejection or partial rejection of the Complaint;
- b) their right to take their Complaint to AFCA if they are not satisfied with The Mutual’s outcome at (a); and
- c) AFCA’s contact details.

The Mutual means Peninsula Mutual Limited AFSL 544232.

Peninsula means Peninsula Pty Ltd as authorised representative of the Mutual, Authorised Representative number 001274577.

Retail Member has the meaning given by s761G of the Corporations Act.

Small Business means, for the purposes of complaint and dispute resolution, a business that had less than one hundred (100) employees at the time of the act or omission by the Mutual that gave rise to the Complaint. A small business includes a primary producer, if that primary producer is also a small business.

Unreasonable Member Conduct means behaviour which because of its nature or frequency raises substantial health, safety, resource or equity issues for the Mutual, its employees and representatives, other Members or the particular Member themselves.

Definition of Complaint

The Mutual must deal with expressions of dissatisfaction that meet the definition of Complaint.

The following expressions of dissatisfaction are included in the definition of Complaint:

- a) posts on a social media channel or account owned or controlled by the Mutual that is subject of the post, where the author is both identifiable and contactable;
- b) Complaints about a matter that is subject of an existing remediation program or about the remediation program itself; and
- c) Complaints about the handling of a Peninsula Protect claim.

The Mutual does not limit its categorisation of Complaints to those expressions of dissatisfaction where a response or resolution is explicitly expected. The Mutual also categorises expressions of dissatisfaction where a response or resolution is 'implicitly expected' as a Complaint.

The Mutual's Commitment to IDR

The Mutual's Directors and Risk Committee ensure they:

- a) have adequate oversight of the Mutual's IDR processes;
- b) provide adequate resources to the Mutual and Peninsula's employees who have responsibility for managing Complaints including but not limited to providing ongoing training and appropriate human resources;
- c) establish and promote the Mutual's Complaints Management Policy to Members;
- d) implement systems and reporting procedures to ensure timely and effective Complaint management and monitoring; and
- e) establish clear roles, responsibility and authority for the management and resolution of Complaints.

Complaints Management Information

The Mutual must ensure that the Complaints Management Information is available free of charge and is available on its website.

If the Complaints Management Information is requested in a particular form, the Mutual takes such steps as are reasonable to provide the Complaints Management Information in the form requested.

PROCEDURES: RECEIVING COMPLAINTS

Enabling Complaints

The Mutual publicises information about how and where Complaints can be made by:

- a) publishing its Complaints Management Policy on the Mutual's website and making the Complaints Management Policy available in hard copy free of charge upon request;
- b) including information about the IDR process in Member information packs;
- c) enabling Members to pursue Complaints via the IDR process free of charge; and
- d) providing training to all representatives of the Mutual and Peninsula about the IDR process.

The Mutual makes its IDR process accessible for Members with disabilities or language difficulties by:

- a) The Mutual proactively identifying Members who might need additional assistance;
- b) ensuring that information provided to the public about the Mutual's IDR process is available electronically to enable it to be viewed in large print.
- c) enabling people to adjust the font size of information on its website;
- d) offering translation services to Members and making available sub-authorised representatives who are cross-culturally trained.

The Mutual offers multiple Complaint lodgement methods including:

- a) toll-free telephone number;
- b) email;
- c) letter;
- d) social media platforms owned or controlled by Peninsula;
- e) in person; or
- f) online.

The Mutual allows representatives of the Member to lodge Complaints on the Member's behalf and accepts authorities from representatives lodging Complaints on behalf of Members. In these circumstances, the Mutual does not contact the Member directly, unless:

- a) the Member requests direct communication with the Mutual;
- b) the Mutual reasonably believes the representative is not acting in the Member's best interests;
- c) the Mutual reasonably believes the representative is acting in a deceptive or misleading manner with the Member and/or Peninsula;
- d) the Mutual reasonably believes the representative is not authorised to represent the Member; and
- e) at the time the Mutual is dealing with the Complaint, the representative has been excluded by AFCA from representing Members in relation to a Complaint lodged with AFCA.

Receiving Complaints

The Mutual and/or Peninsula's employees must immediately refer Members wishing to make a Complaint to the Complaints Officer. This ensures that wherever possible, the Complaint is to be investigated by an employee not involved in the subject matter of the Complaint.

On receiving a Complaint, the following information must be recorded:

- a) Date of Complaint;
- b) Name of Member;
- c) Peninsula's business team concerned;
- d) Contact details of Member;
- e) Format of Complaint (phone / email / letter / fax);
- f) Preferred contact method of Member (phone / email / letter / fax);
- g) Details of the Complaint; and
- h) Classification of the Complaint

Complaints received over the phone

The following procedure must be followed when a Complaint is received orally:

- a) Identify yourself, listen, record details and determine what the Member wants;
- b) Confirm the details received;
- c) Empathise with the Member in a courteous manner;
- d) Explain the courses of action available;
- e) Do not attempt to lay blame or be defensive;
- f) Resolve the Complaint if possible or commit to do something immediately, irrespective of who will ultimately handle the Complaint;
- g) Don't create false expectations;
- h) Inform the Member of the name and contact details of the person who will be formally dealing with the Complaint (the Mutual Compliance Manager);
- i) Refer the matter immediately to the Mutual Compliance Manager (even if you resolved the matter); and
- j) Record the details in Client Experience Console and Escalate to the Mutual Compliance Manager

Classification of complaints

- 1) All Complaints must be classified by the Mutual and then analysed to identify systemic, recurring and single incident problems and trends. Complaints should be prioritised according to the urgency and severity of the issues raised. Examples of matters that should be prioritised include where:
 - a) the Member is experiencing domestic or financial abuse;
 - b) the Member has a serious or terminal illness; or
 - c) a delay in addressing the Complaint could adversely affect the Member's basic living conditions.

Level 1 – the least serious Complaints. The Complaint could not be resolved at first contact with the Member. Some Complaints at this level require the assistance of other employees at Peninsula (e.g. Mutual Compliance Team). The Complaint can be resolved without escalating it to the Risk Committee.

Level 2 – more serious Complaints. The Mutual Compliance Manager must be informed of the Complaint and may provide input where necessary to help resolve the Complaint.

Level 3 – the most serious Complaints. This type of Complaint requires the involvement of the Risk Committee and/or Board.

Responsibility for and Investigation of Complaints

At first instance the Mutual Compliance Manager is responsible for dealing with Complaints.

If the Mutual Compliance Manager is unable to resolve the Complaint within twenty-five (25) days, the details of the Complaint must be immediately forwarded to the Risk Committee and/or Board who has overall responsibility for the Mutual's IDR process.

The Risk Committee and/or Board is to review the circumstances involving the Complaint and attempt to provide the Member with an IDR Response to the Complaint.

PROCEDURES: RESPONDING TO COMPLAINTS

Responding Flexibly

The Mutual deals with Complaints with as little formality as possible to ensure that Members are not restricted in their access to the Mutual's IDR process.

Acknowledging complaints

Once the Complaint is received, the Complaints Officer must acknowledge receipt of the Complaint within twenty-four (24) hours (or one (1) business day) of receiving the Complaint, or as soon as practicable. The Complaints Officer must attempt to resolve the Complaint within thirty (30) calendar days of it being received.

When selecting a method to acknowledge a Complaint, the Mutual takes into account the method used by the Member to lodge the Complaint and any preferences the Member has expressed about receiving communication from the Mutual. The Mutual may acknowledge Complaints:

- a) verbally; or
- b) in writing (including by email, mail or social media channels).

Refer to *Appendix 2 - IDR Acknowledgement*.

Complaints closed within five (5) business days of receipt

An IDR Response is not required where a Complaint has been closed within five (5) business days of receipt because:

- a) the Mutual has resolved the Complaint to the Member's satisfaction and this is either:
 - i) confirmed verbally or in writing by the Member; or
 - ii) a reasonable view to take given the circumstances; or
- b) the Mutual has given the Member an explanation and/or apology when it can take no further action to reasonably address the Complaint.

A written IDR Response must be provided even where a Complaint is closed within five (5) business days if:

- a) the Member requests a written response; or
- b) the Complaint is about:
 - i) a declined claim;
 - ii) the value of a claim; or

IDR Responses

Complaints referred to the Mutual Compliance Manager must be responded to in the same manner they are received unless otherwise requested by the Member. For example, a telephone Complaint must be initially responded to with a telephone call.

The time and date of all telephone calls to the Member made in connection with a Complaint must be recorded with other details about the Complaint.

An IDR Response must be provided to the Member upon resolving a Complaint. The written communication must inform the Member of:

- a) the final outcome of their Complaint at IDR, including either:
 - i) confirmation of the actions taken by the Mutual to fully resolve the Complaint; or
 - ii) reasons for the rejection or partial rejection of the Complaint;
- b) their right to take the Complaint to AFCA if they are not satisfied with the IDR Response; and
- c) the contact details for AFCA.

If the Mutual rejects or partially rejects the Complaint, the IDR Response must clearly set out the reasons for the decision by:

- d) identifying and addressing the issues raised in the Complaint;
- e) setting out the Mutual's finding on material questions of fact and referring to the information that supports those findings; and
- f) providing enough detail for the Member to understand the basis of the decision and to be fully informed when deciding whether to escalate the matter to AFCA or another forum.

Refer to *Appendix 3 - IDR Response*.

Timeframes For IDR Responses

The Mutual must provide an IDR Response to the Member within thirty (30) calendar days of receiving the Complaint.

If the Complaint cannot be resolved within thirty (30) calendar days of the initial Complaint, an IDR Delay Notification must be sent to the Member prior to the expiry of the IDR timeframe.

Only in exceptional circumstances should a Complaint remain unresolved for longer than thirty (30) calendar days from the initial notice of Complaint.

Complaint Management Delays

The Mutual is not required to provide a Member with an IDR Response within the IDR timeframe where:

- a) there has been no reasonable opportunity to provide the IDR Response within the IDR timeframe because:
 - i) the resolution of the Complaint is particularly complex, for example, the individual Complaint is about a transaction or event that occurred more than six (6) years ago and requires reconstruction of account information; and/or
 - ii) circumstances beyond the Mutual's control are causing Complaint management delays, for example, the Member is waiting on a medical appointment that the Mutual reasonably requires the Member to attend or the Member is unable to respond to the Mutual due to illness or absence; and
- b) an IDR Delay Notification has been sent to the Member prior to the expiry of the IDR timeframe (i.e.: thirty (30) calendar days).

Note: Complaint management delays caused by an authorised representatives is not a valid reason for the Mutual to have not provided an IDR Response within the required timeframe.

The IDR Delay Notification must inform the Member about:

- c) the reasons for the delay;
- d) their right to complain to AFCA if they are dissatisfied; and
- e) the contact details for AFCA.

Refer to *Appendix 4 - IDR Delay Notification*.

The exceptions to providing an IDR Response outlined do not prevent the Member from escalating their Complaint to AFCA and do not affect AFCA's ability to register a Complaint.

RECORD KEEPING

Complaints Register

A Complaints register is to be compiled and managed by the Mutual Compliance Manager.

A copy of the Complaints Register is to be provided to Breach Reporting Working Group on a monthly basis for review and uploading to the Mutual Breach Register (if applicable) and provided to the Risk Committee quarterly for review. The Mutual Compliance Manager must maintain a soft copy record of the Complaints Register.

Complaints Data

The Mutual must provide reports about Complaints' data on monthly basis to Breach Reporting Working Group and Quarterly to the Mutual's Risk Committee.

These reports should include:

- a) the number of Complaints received;
- b) the number of Complaints closed;
- c) the circumstances giving rise to Complaints;
- d) the time taken to acknowledge Complaints;
- e) the time taken to resolve or finalise Complaints;
- f) Complaint outcomes, including:
 - i) the number of Complaints resolved;
 - ii) the number of Complaints unresolved;
 - iii) the number of Complaints that were abandoned or withdrawn; and
 - iv) details of amounts paid to Members to resolve Complaints;
- g) possible systemic issues identified;
- h) the underlying causes of Complaints;
- i) Complaint trends;
- j) the number of Complaints escalated to AFCA; and
- k) recommendations for improving products or services.

Identifying And Recording Systemic Issues

The Mutual Compliance Manager aims to identify any systemic issues or recurring Complaints as a result of compiling the Complaints Register.

Where any systemic issues or recurring Complaints are identified, these are notified to the Risk Committee by preparing a report to accompany the Complaints Register. The report must include metrics and analysis of Member Complaints including the systemic issues identified through those Complaints. This encourages the identification of compliance issues or risks, which can be investigated to determine their causes and then rectified.

The Risk Committee must ensure that prompt action is taken to rectify systemic issues and:

- a) identify affected Members; and
- b) provide fair remediation to affected Members.

The Mutual must:

- a) encourage and enable employees/representatives to escalate potential systemic issues identified from individual Complaints;
- b) regularly analyse Complaint data to identify systemic issues;
- c) promptly escalate potential systemic issues for investigation and action; and
- d) report internally on the outcome of investigations, including actions taken, in a timely manner.

Where any systemic issue results in a breach of the Mutual's AFSL obligations under its AFSL 544232, or the Mutual's obligations as an unauthorised product issuer under the Corporations Act or any other financial services laws; the breach is reported by the Mutual Compliance Manager in accordance with the Mutual's Breach Reporting Policy.

Compliance Audits

The Mutual must undertake compliance audits at least annually, unless the number of Complaints is very small.

REMEDIES

Types Of Remedies Available For Resolving Complaints

If the Mutual Compliance Manager is of the opinion that a Complaint requires a remedy, the matter must be referred to the Risk Committee who is appropriately authorised to determine and approve any remediation to be paid to Members.

In determining the appropriate remedy, the Risk Committee considers a broad range of remedies to facilitate the fair and efficient resolution of the Complaint, including:

- a) an explanation of the circumstances giving rise to the Complaint;
- b) an apology;
- c) provision of assistance or support;
- d) a refund or waiver of a fee or charge;
- e) a goodwill payment;
- f) a compensation payment;
- g) correcting incorrect or out of date records;
- h) changing the terms of a contract; and

undertaking to set in place improvements to the Mutual's systems, procedures or products.

Closing Complaints

The Mutual should record the Complaint outcome, Complaint remedy and financial compensation amount (if any).

The Mutual must ensure that Complaint resolution outcomes are implemented in a timely manner when a Complaint is closed.

EXTERNAL DISPUTE RESOLUTION

Australian Financial Complaints Authority

The Mutual as the AFS Licensee 544232 is a Member of AFCA membership No 99382. If Membership with AFCA is changed or cancelled, the Mutual must notify ASIC within ten (10) business days of the change.

Where the Mutual has failed to renew its AFCA membership or where its AFCA membership has been cancelled because of failure to pay membership fees, non-compliance with the Terms of Reference or decision of AFCA, the Mutual will prepare a written report to ASIC within three (3) business days of the change. Note this obligation will revert the Mutual when its membership to AFCA is formalised.

The Mutual Compliance Manager will ensure that the AFCA membership is renewed on the appropriate date. The Mutual liaises with AFCA and ensure full cooperation with it. The Mutual must provide details about how a Member can access AFCA in a range of documents including:

- a) its website;
- b) Financial Services Guides;
- c) Product Disclosure Statements (PDSs), including short-form PDS's; and
- d) Peninsula and the Mutual's Internal Dispute Resolution Brochure

CONCLUSION

Duty Of Care To Members

The Mutual Compliance Manager is responsible for ensuring the Mutual's IDR process does not involve the release of information in relation to:

- a) The Mutual generally;
- b) Members or the Mutual's representative's individual information;

that contravenes the privacy laws, any of the Mutual's policies in relation to confidential information or the contractual obligations of the Mutual.

Responses to IDR matters that contain personal information about a Member or an employee of Peninsula must be provided to the Mutual Compliance Manager for final approval, prior to publication or release.

The Mutual Compliance Manager and/or Risk Committee must ensure express consent has been obtained from the Member prior to disclosing any personal information.

Outsourcing

Where the Mutual outsources part, or all, of its IDR process, the Mutual must:

- a) have measures in place to ensure that due skill and care is taken in choosing suitable service providers;
- b) monitor the ongoing performance of service providers; and

- c) appropriately deal with any actions by service providers that breach service level agreements or fall short of their obligations.

The Mutual's outsourcing procedures are included in its Outsourcing Policy.

Training

Employees of Peninsula and the Mutual who deal with Members, not just Complaints handling staff, need to have an understanding of the IDR process. Consequently, all employees of Peninsula and the Mutual receive targeted induction and ongoing training about the IDR process. This training is scheduled and conducted at the discretion of the Mutual Compliance Manager.

Training includes the following topics:

- a) the Mutual's IDR process and applicable policies;
- b) the requirements of RG271;
- c) AFCA position statements and industry codes of practice;
- d) any changes to the Mutual's products and services which may impact Members and lead to expressions of dissatisfaction;
- e) how to identify Members who may need additional assistance;
- f) dealing with Unreasonable Member Conduct;
- g) effective communication and negotiation techniques;
- h) effective written communications;
- i) Complaint data capture and internal reporting;
- j) issue identification and analysis; and
- k) identifying and escalating systemic issues, including reporting lines.

Resources

The Risk Committee at all times ensures there are adequate resources for IDR processes to operate effectively and efficiently. The Risk Committee conducts an annual review of the resources allocated to the Mutual's IDR process to ensure they are adequate.

To ensure adequate systems are in place to handle Complaints promptly, fairly and consistently, the Risk Committee:

- a) reviews IDR processes on a regular basis and provides additional resources without delay where required;
- b) ensures at all times, there is an established contact point for Members;
- c) ensures persons involved in handling Complaints are adequately trained and competent to deal with Complaints, including the authority to settle Complaints or have ready access to someone with the necessary authority; and
- d) ensures there is appropriate documentation, specialist support, materials and equipment, computer hardware and software, and finances to assist with the IDR process.

Policy Review

This Policy is reviewed every two years or as required by law by the Mutual Compliance Manager having regard to the changing circumstances of the Mutual. The Mutual Compliance Manager then reports to the Risk Committee on compliance with this Policy.

Legislative Basis

This Policy gives effect to the reforms introduced by the Treasury Laws Amendment (Putting Consumers First – Establishment of the Australian Financial Complaints Authority) Act 2018 and complies with ASIC Regulatory Guide 271: Internal Dispute Resolution and Peninsula Mutual's obligations under sections 912A(1)(g) and 1017G(1) of the Corporations Act.

This Policy has been developed in accordance with the principles outlined in Australian Standard AS/NZS 10002: 2014.

COMPLIANCE MEASURES AND ASSESSMENT:

The successful completion of the following tasks will demonstrate compliance with the required regulatory obligations.

Task	Responsible Person	Frequency	Reporting
Monitoring representative to ensure all Mutual complaints are identified and accurately recorded.	MCM	On-going	Risk Committee
Complaints are acknowledged with 24 hours or one business day	MCM	On- going	Risk Committee
All Complaints are investigated within 25 days	MCM	On-going	Risk Committee
Complaints are entered into the Complaints Register	MCM	Fortnightly	Risk Committee
Complaints and Disputes are reported in compliance reports.	MCM	Quarterly	Risk Committee
Complaints are monitored and reviewed to identify systemic issues, recurring problems and trends.	MCM	Fortnightly	Breach Reporting Working Group
Letters to Members have been sent within the guidelines and timeframes.	MCM	Fortnightly	Risk Committee

Risk Identified

- **Failure to meet regulatory requirements** - non-compliance with ASIC license and regulatory requirements.
 - Loss of AFSL, fines and penalties and loss of Member confidence.

Regulatory References

RG 275 – Internal Dispute Resolution

Australian Securities and Investments Commission Act 2001, s1 and 12A

Corporations Act: Ch 7; s601RAB, 601RAC, 760A, 761G, 912A, 912D, 1012C, 1017G, 1053, 1053A, 1056

Corporations Regulations, Act - regs 5D.2.01, 5D.2.02, 7.1.28A, 7.6.02, 7.9.77

AS/NZS 10002: 2014.Complaints Handling, Customer satisfaction - Guidelines for complaints handling in organisations.

Documentation

Peninsula Mutual Complaints Policy
 Complaints and Dispute Member Flyer
 PML Complaints Register
 PML Claims Review Template
 PML IDR Acknowledgment
 PML IDR Delay Notification
 IDR Response Template
 PML Unreasonable Member Conduct – IDR

Policy/Procedure Version Control:

Complaint and Dispute Resolution Policy

This policy and its procedures are reviewed every two years or as required, due to legislation or procedural changes, below indicates the current version of this specific policy and its procedures.

Document Version	Total Pages	Reviewed By	Last Review	Status	Amendment
EML_CM21.01	15	Natalie Young and Jodie Nicholls	04/10/2021	For approval	New Policy
EML_CM2.0	16	Sarah Roberds	13/10/2022	Draft	Updated review period, contact details, formatting.
EML_CM2.0	16	Sarah Roberds	13/10/2022	Approved	Approved by Risk Committee
EML_CM	14	Georgia Evans	01/06/2023	Approved	Updated with the Mutual's AFSL details and removal of Regis Mutual Management.
PML_CM3.0	17	Matthew Bockman	01/07/2024	Approved	Updated to remove "Employsure" and replace with "Peninsula".

Appendix 1

Policy for dealing with unreasonable Member conduct

Unreasonable Member Conduct

- 1) The Mutual must manage each Complaint in a fair and equitable manner, including those lodged by Members who display Unreasonable Member Conduct.
- 2) The Complaints Manager is responsible for ensuring that all Members are treated fairly and with respect and where a Member displays Unreasonable Member Conduct on one or more occasions, the Complaints Manager ensures the Member is labelled an unreasonable person but recognises it is the person's behaviour which is unreasonable, not the individual themselves.
- 3) Examples of Unreasonable Member Conduct includes but is not limited to the following:
 - a) **unreasonable persistence** e.g., excessive volumes of telephone calls, emails, letters and supplying excessive volumes of paperwork in support of the Complaint (when requested not to) or refusing to accept Peninsula Mutual's IDR Response based solely on the fact it is not in the Member's favour;
 - b) **unreasonable demands** e.g., demanding a different Complaint outcome without demonstrating the original Complaint decision was wrong as well as demanding the Member's matter be given priority or the Complaint outcome changed;
 - c) **unreasonable lack of cooperation** e.g., failing or refusing to identify the issue of the Complaint or providing disorganised information (where they are capable of organising the information);
 - d) **unreasonable arguments** e.g., the Member expressing irrational claims/beliefs/conspiracy theories, or illogically or unrealistically denying any responsibility for the Complaint; and
 - e) **unreasonable behaviour** e.g., the Member making threats of harm to self, Peninsula or the Mutual's employees or third parties, making baseless attacks on the intentions, motivations, ethics or conduct of Peninsula Mutual's employees, using abusive behaviour beyond what is reasonable to expect Peninsula Mutual's employees to put up with, expressing unreasonable anger, aggression or violence, lying or being intentionally misleading.

Management and Controls

- 1) The Mutual manages Unreasonable Member Conduct by:
 - a) Recognising the reasonable right to freedom of expression, including the Member's right to express dissatisfaction with the Mutual or its products and services;
 - b) training of Peninsula and the Mutual's employees to ensure focus is placed on Member conduct and the content of Member communications and not the individual person;
 - c) training Peninsula and the Mutual's employees to accept that they cannot change a Member but can modify communications with the Member dependent on the Member's conduct (e.g. requesting all communication be in writing where the Member has previously been abusive);
 - d) the Board considers the following options where a Member displays Unreasonable Member Conduct on a regular basis:
 - i) restricting service; or
 - ii) terminating services altogether;
 - e) communication with the Member to advise them of their right to communicate with the Mutual and the way the Mutual's services are provided to the Member.

Complaints Management Information

1 JULY 2024

Introduction.

Peninsula Mutual Limited (“**Peninsula Mutual, we or us**”) is committed to effective and efficient complaints management and to fair and transparent dealings in the financial marketplace.

A complaint is an expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.

Our Complaints Management and Dispute Resolution Policy.

We take your feedback seriously and will work proactively to investigate and resolve your complaint. If you have a complaint, please contact us by any of the following methods:

General Complaint

Contact the Client Experience Team



client.experience@peninsula-au.com



1300 651 415

Privacy Complaints

Contact the Business Risk Officer



compliance.risk@peninsula-au.com



1300 651 415

Peninsula Mutual Complaints

Contact the Peninsula Mutual Compliance Team



peninsula.mutual@peninsula-au.com



1300 651 415

**Write to: Peninsula Australia Pty Ltd
or Peninsula Mutual Limited**



Level 6, 180 Thomas Street,
Haymarket, NSW 2000.

Any material relating to Peninsula Mutual's Internal Complaints and Dispute Resolution ("IDR") process will be provided to you free of charge.

We will collect certain information from you, including:

- (a) Your name;
- (b) Your contact details;
- (c) How you would prefer to be contacted;
- (d) A description of your complaint; and
- (e) How you would like the complaint resolved.

We will acknowledge your complaint, generally within one (1) business day, and give you the contact details of the person responsible for dealing with your complaint.

The person responsible for dealing with your complaint will commence their investigation and may require further details from you. Upon completion of their investigation, the person responsible for dealing with your complaint will contact you with an IDR response. This will provide you with information about:

- a) the final outcome of your complaint at IDR; and
- b) your right to take the complaint to the Australian Financial Complaints Authority ("AFCA") if you are not satisfied with the IDR response and how to contact AFCA.

An IDR response is not required to be provided to you when a complaint is resolved by the end of the fifth (5th) business day of receipt of the complaint, where we have:

- a) resolved the complaint to your satisfaction; or
- b) given you an explanation and/or apology when no further action to reasonably address the complaint can be taken.

A written response will be provided if:

- a) you request a written response; or
- b) the complaint is about hardship.

Timeframe for Resolving Complaints.

We endeavour to resolve all complaints as quickly as practicable. Many complaints can be resolved within days or on the spot. We will keep you informed in relation to your dispute and will provide you with an IDR response within thirty (30) calendar days of receiving your complaint.

If you are unhappy with our response.

If your complaint is not resolved to your satisfaction through our IDR process, you have the right to refer your complaint to AFCA. AFCA is an independent and external dispute resolution scheme, of which Peninsula Mutual ACN 630 256 478 AFSL 544 232 is a member.

You can lodge your complaint with AFCA by sending the relevant information and documents to:



Australian Financial Complaints Authority Limited

GPO Box 3

Melbourne VIC 3001

Phone: 1800 931 678

Fax: (03) 9613 6399

Email: info@afca.org.au

Website: <https://www.afca.org.au/>

Accessibility Services.

We take our commitment to provide accessible services to customers seriously.

If you are deaf or have a hearing or speech impairment, you can contact us on the [National Relay Service](#), a government initiative that offers an Australia-wide phone service for people who are deaf or have a hearing or speech impairment. It's available at no additional charge:

- (f) Talk to text users, please call 133 677 and then ask for [insert phone];
- (g) Speak to listen users, please call 1300 555 727 and then ask for [insert phone];
- (h) Internet relay users, please [connect to the NRS](#) and then ask for [insert phone].

If you require this Policy in another language, please contact us at the details below.

Contact Us

If you have any questions or would like further information about our complaints handling process, please contact us by:

Peninsula Mutual Complaints

Contact the Peninsula Mutual
Compliance Team



Peninsula.mutual@peninsula-au.com



1300 651 415

Write to Peninsula Mutual Limited



Level 6, 180 Thomas Street,
Haymarket, NSW 2000.