

# Complaints Handling Policy

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VER Limited (ACN 609 868 000) in its capacity as a responsible entity of  
Waypoint REIT Trust (ARSN 613 146 464)  
Waypoint REIT Limited (ACN 612 986 517)

Approved by the Board and effective 17 October 2024

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## 1 Our Commitment

- (a) Waypoint REIT Limited and VER Limited as the responsible entity of the Waypoint REIT Trust (**Waypoint REIT**) is committed to managing complaints effectively and efficiently and in compliance with the Australian Financial Services Licence (**AFSL**) and managed investment scheme regulatory requirements. This commitment is demonstrated through:
  - (i) ensuring complaints are managed consistently and brought to a satisfactory resolution;
  - (ii) managing personal and private information in accordance with the *Privacy Act 1988* (Cth) and Waypoint REIT's **Privacy Policy**;
  - (iii) ensuring our complaints handling procedures are accessible to all customers and other external parties;
  - (iv) ensuring complaints received are dealt with fairly and resolved in a timely, sensitive and effective manner;
  - (v) ensure complaints are addressed in an objective and unbiased manner and do not discriminate against or otherwise disadvantage anyone who lodges a complaint;
  - (vi) regular analysis of complaints received and the implementation of rectification action where deficiencies in our internal systems and procedures are identified; and
  - (vii) ensuring that there are sufficient resources devoted to adequately cover the handling of disputes, and that the relevant staff are trained about the existence of our internal and external dispute resolution procedures.

## 2 Application of Policy

- (a) This Complaints Handling Policy (**Policy**) applies to Waypoint REIT (and its subsidiaries) and anyone who is employed by or works at Waypoint REIT, including employees (whether permanent, part time, fixed-term or temporary), contractors, consultants, and directors or other third parties engaged to provide services on behalf of Waypoint REIT.
- (b) Waypoint REIT welcomes feedback from all Waypoint REIT stakeholders and takes all complaints or concerns that may be raised seriously. This Policy is designed to assist you to understand how to make a complaint.
- (c) The Company Secretary should be contacted with respect to any queries pertaining to this Policy.

## 3 Guiding Principles for Handling Complaints

- (a) When managing a complaint, or a dispute, Waypoint REIT will always aim to apply the following guiding principles:

<b>Commitment</b>	We are actively committed to defining and implementing a complaints management process. We treat complainants with respect.
<b>Capacity</b>	We make sufficient resources available for, and are committed to, complaints management, and we manage those resources effectively and efficiently.
<b>Visibility</b>	This Policy and our procedures are communicated to staff, volunteers and contractors, Waypoint REIT's stakeholders and other relevant interested parties. We provide individual complainants with adequate information about the management of their complaint.
<b>Information Integrity</b>	We ensure that the information about our complaints management process is accurate and not misleading, and that data collected is relevant, correct, complete, meaningful, and useful.
<b>Responsiveness and Timelines</b>	Complainants must be kept fully informed of the progress of their complaint and complaints should be resolved as quickly as possible.
<b>Accessibility</b>	We aim to make the complaints management process simple and easily accessible to all. Through this Policy and procedures, we make information publicly available in relation to the details of making and resolving complaints and all complaints management information is easy to understand and use. Our staff have access to our internal Complaints Management Program.
<b>Complainant Focus Approach</b>	We aim to put ourselves in the shoes of the complainant and understand the complaint from their point of view. We adopt a complainant-focused approach with respect to management of complaints and we are open to feedback on our complaints management process.
<b>Completeness</b>	We are committed to undertaking a thorough investigation of each and every complaint talking to people from both sides to establish common ground and verify explanations.
<b>Objectivity and Fairness</b>	We address each complaint, on its merits, in an equitable, objective, and unbiased manner through our complaints management program.
<b>Charges</b>	Access to our complaints management policy and procedure is free of charge to the complainant.
<b>Confidentiality</b>	We treat all complaints confidentially. Personally identifiable information about complainants is only made available for the purpose of addressing the complaint within Waypoint REIT and, unless the complainant consents, is actively protected from disclosure in accordance with our <b>Privacy Policy</b> .
<b>Transparent</b>	We aim to make the complaints handling process as transparent as possible and in responding to a complaint will, where practical, give reasons for our decision in writing, referring to applicable provisions in legislation, codes, standards, or internal procedures.
<b>Treatment of Personnel</b>	Where a complaint specifies action of a particular individual we will apply principles of responsiveness, accessibility, completeness, objectivity, confidentiality, and transparency to that individual.
<b>Recording Information</b>	When dealing with a complaint, and in particular when recording information relating to the complaint, we take the view that this information may at some time in the future be requested by the complainant or may be made public as a result of litigation (whether related to or unrelated to the particular complaint).
<b>Improvement</b>	One of Waypoint REIT's permanent objectives is to increase effectiveness and efficiency of our complaints management process.

## 4 Source of Obligation

### 4.1 Complaints handling standards

- (a) Waypoint REIT as required by the Corporations Act, are members of an external dispute resolution scheme being the Australian Financial Complaints Authority (**AFCA**). From October 2021, Waypoint

REIT must have in place an internal dispute resolution system for complaints handling that complies with the standards and requirements as set out in ASIC Regulatory Guide 271.

- (b) To manage complaints effectively, Waypoint REIT have established a Complaints Management Program in line with the Australian/New Zealand complaints management standard (AS/NZS 10002:2014 Guidelines for complaint management in organisations).

## 4.2 What is a complaint?

- (a) ASIC Regulatory Guide 271 definition of “complaint” is:
  - (i) *“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**.”*
  - (ii) Complaints or disputes can be made verbally or in writing.

## 4.3 What is not a complaint?

- (a) **An initial request for a service or action.** However, subsequent requests may be an implicit complaint about service, inaction, or delay.
- (b) **Statements about an overall opinion** are generally not complaints, unless a response or resolution is expected, or should reasonably be provided.
- (c) **Requests for information or explanations.** However, repeated requests for explanations may be implied complaints about the quality of services, decisions or reasons previously provided.
- (d) **Requests for updates are not generally complaints.** However, some requests for updates may be implied complaints about delay or inaction.

# 5 Complaints Handling Processes and Responsibilities

## 5.1 The complaints handling process

- (a) Complaints may be received by any employee, at any time, either over the telephone, or during face-to-face meetings. If an employee receives a complaint, they must immediately report it to the Complaints Manager.
- (b) Employees must liaise with the Complaints Manager and must not attempt to resolve the dispute without the input and approval of the Complaints Manager. Any course of rectification or resolution may require approval by the Board depending on the nature of the complaint and in accordance with the Waypoint REIT's **Manual of Authorities**.
- (c) Company Secretary has been appointed to act as the Complaints Manager. This individual is authorised to investigate and manage complaints once they have been received.
- (d) When a complaint has been received, the Complaints Manager, will:
  - (i) acknowledge the complaint by the next day after receipt, or as soon as practicable; and

- (ii) consider the complaint and provide a final response within 30 calendar days of receipt of the complaint, unless complexity or circumstances beyond Waypoint REIT's control mean that there has been no reasonable opportunity to provide the response.
- (e) A "final response" requires that we must write to the complainant within 30 calendar days, informing them of:
  - (i) the final outcome of the complaint as a result of internal dispute resolution being either confirmation of actions taken by Waypoint REIT to fully resolve the complaint, or reasons for rejection or partial rejection of the complaint.
  - (ii) their right to take their complaint to external dispute resolution AFCA if they are not satisfied with the internal dispute resolution response; and
  - (iii) the contact details of AFCA.

## 5.2 Complainant's rights

- (a) The complainant has the right to:
  - (i) make a complaint and express opinions that are appropriate, reasonable and lawful;
  - (ii) be addressed in an equitable, objective and unbiased manner;
  - (iii) be informed of Waypoint REIT's procedures for dealing with complaints, including avenues for further and/or independent review;
  - (iv) be given a reasonable opportunity to explain their position on the complaint and provide appropriate information before any decision is made;
  - (v) receive prompt acknowledgement of the complaint and to receive updates on progress and resolution of their complaint in a timely manner including reasons for decisions and next steps available to them if they do not agree with the decision;
  - (vi) not be subject to any detrimental action including reprisal, negative profiling or unreasonable withdrawal of products or services;
  - (vii) have access to information about the Waypoint REIT's complaints management processes and procedures; and
  - (viii) have their complaint assessed with fairness and objectivity, on its own merits with the final decision based on evidence and impartiality.

## 5.3 Corrective action in response to complaints

- (a) Once a complaint has been assessed, if appropriate, corrective action will be taken as soon as possible. Details of the action taken must be logged through Waypoint REIT's online complaints management system to track compliance and forwarded to the relevant task owner.
- (b) Where corrective action involves compensation or reimbursement to the complainant, approval will be sought by the Complaints Manager and by the Board depending on the nature and in accordance with the Waypoint REIT's Manual of Authorities, prior to any financial agreement being made to redress the issue.
- (c) All compensation or reimbursements should be fair, and any consideration given to the complainant must not disadvantage others.

- (d) Additional action may also involve:
  - (i) amendments to policies, procedures or controls;
  - (ii) training of employees; and
  - (iii) enhancement to monitoring or review processes.

#### 5.4 Complaints reporting

- (a) All complaints must be logged through Waypoint REIT's online complaints management system.
- (b) The Complaints Manager will report to the Board via the Audit and Risk Management Committee (**ARMC**) on a quarterly basis, a report highlighting:
  - (i) the number of complaints received;
  - (ii) details and analysis of individual complaints;
  - (iii) details of corrective action undertaken; and
  - (iv) statistical trends.
- (c) These reports will be made on a 'no names' basis, maintaining the confidentiality of matters raised under this Policy.
- (d) In addition, serious and/or material reportable conduct will be considered by the Complaints Manager for immediate referral to the Chair of the ARMC.

## 6 How do complainants make a complaint?

- (a) We ask that, where appropriate, you first raise the matter directly with a relevant staff member. If that is not appropriate or the issue was not addressed to your satisfaction, please contact our Complaints Manager on +61 3 9081 8433 or via email to [Tina.Mitas@waypointreit.com.au](mailto:Tina.Mitas@waypointreit.com.au).
- (b) If you have been unable to resolve a matter informally, or simply wish to make a formal complaint you can do so by any of the following means:

### 6.1 Step 1

#### (a) Contact our Complaints Manager

Please contact our Complaints Manager by:

**Phone:** +61 3 9081 8433

**Email:** [tina.mitas@waypointreit.com.au](mailto:tina.mitas@waypointreit.com.au)

**In writing to:**

Attention: Complaints Manager

Waypoint REIT Limited (ABN 35 612 986 517)

GPO Box 4716

Melbourne VIC 3001

Australia

A complaint can be made verbally or in writing.

All complaints received (whether verbally or in writing), will be logged through Waypoint REIT online complaints management system. This system has been designed to capture relevant information necessary for the effective management of a complaint.

Complaints can be made anonymously, and Waypoint REIT will accept and respond to an anonymous complaint, provided we have received enough information to do so.

**(b) Accessibility and Support**

- (i) Waypoint REIT is committed to providing a complaints management service that is accessible to all our stakeholders. Our staff members are trained to be proactive when identifying, supporting, and assisting people who might need special assistance to make a complaint.
- (ii) In addition to the accessibility options below, Waypoint REIT can also provide:
  - (A) A free translator, if English is not your first language (including Auslan).
  - (B) More flexibility with our process requirements.
  - (C) Referral to community support services.

**(c) Hearing and speech**

- (i) A complainant who is deaf or has a hearing or speech impairment can contact us through the National Relay Service using:
  - (A) TTY/Voice Text Telephone: 133 677 (local call) then ask for the phone number you wish to contact.
  - (B) Speak and Listen: 1300 555 727 (local call) then ask for the phone number you wish to contact.
  - (C) Internet Relay ([www.relayservice.gov.au](http://www.relayservice.gov.au)) then ask for the phone number you wish to contact.
- (ii) You can also nominate email (or post) as your preferred method of communication.

**(d) Mental Health**

- (i) If you have a mental health condition, we will take steps to understand if you see this as affecting your ability to engage with us to resolve your complaint.
- (ii) You can choose to:
  - (A) Nominate email (or post) as your preferred method of communication.
  - (B) Lodge your dispute over the phone.

**(e) Language**

- (i) At your request:
  - (A) Waypoint REIT can provide information about our services in different languages.



- (B) You can write to us in your preferred language, and we will have your correspondence translated.
- (C) We can arrange for our correspondence to be translated into your preferred language.

**(f) Vision**

- (i) You can increase the font size on our website as needed.
- (ii) At your request:
  - (A) We can mail a dispute form to you in a large font size, e.g., 16pt or larger.
  - (B) We can print our correspondence to you in a large font size, e.g., 16pt or larger.
  - (C) You can lodge your dispute over the phone.

## **6.2 Step 2**

We believe that we can resolve most matters for you however, if you are not satisfied with how we have handled your complaint or our proposed resolution, you may wish to lodge a complaint with the AFCA. AFCA provides fair and independent financial services complaint resolution that is free to consumers.

**Website:** [www.afca.org.au](http://www.afca.org.au)

**Email:** [info@afca.org.au](mailto:info@afca.org.au)

**Telephone:** 1800 931 678 (free call)

**In writing to:**

Australian Financial Complaints Authority Limited  
GPO Box 3  
Melbourne VIC 3001  
Australia

## ANNEXURE A – Definitions

For the purpose of this Policy, the following definitions apply:

**AFCA** means the Australian Financial Complaints Authority.

**AFSL** means the Australian Financial Services Licence issued by ASIC under section 913B of the Corporations Act.

**ASIC** means the Australian Securities and Investments Commission.

**ARMC** means the Company's audit and risk management committee.

**Board** means the Board of the Company and the Board of the responsible entity, VER Limited.

**Company** means Waypoint REIT Limited ACN 612 986 517.

**Company Secretary** means the Company Secretary of the Company.

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

**Complaints Manager** means the Company Secretary of the Company.

**Policy** means this policy.

**Trust** means the Waypoint REIT Trust ARSN 613 146 464.

**Waypoint REIT** means each of the Company and the Trust and their wholly owned subsidiaries or any of them, as the context requires.