

## IDR Policy

Franchise Information 116

### Internal Dispute Resolution Procedures

CT MONEY is committed to the effective handling of complaints and resolution of disputes and sees this as a key means of ensuring that the services offered by CT MONEY and its representatives are provided efficiently, honestly and fairly.

These complaints and disputes resolution procedures have been created to meet the requirements of the Credit Ombudsman Scheme Limited (COSL) and the MFAA Code of Practice, Australian Standards and relevant laws.

Every Credit Representative, staff member, Principal and Consultant, needs to understand and follow these procedures.

What is a complaint?

A complaint is defined in AS ISO 10002-2006 as:

An expression of dissatisfaction made to an organisation, related to its products or services, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected.

How may a customer complain?

A customer may make a complaint in any format, for example by telephone, letter, e-mail or in person.

If CT Money receive a formal complaint from a customer about a credit service we have provided it must be immediately reported to a CT MONEY Complaints Officer. This is important as CT MONEY is required to maintain accurate records of all complaints regardless of the resolution or outcome.

1st point of contact at CT MONEY:

Complaints Officer:

Name: Ron Boulden

Position: Sales Manager

Phone: 02 9026 8859

Email: ron.b@capitaltrust.com.au

2nd point of contact at CT MONEY:

Complaints Officer:

Name: Peter Frampton

Position: Chairman

Phone: 02 9026 8888

Email: [peter.f@ctmoney.com.au](mailto:peter.f@ctmoney.com.au)

The Complaints Officers in CT MONEY Pty Ltd have the necessary experience and authority to handle your complaint and make relevant decisions on outcomes.

The complaint need not be in writing and may be presented by any reasonable means, for example letter, telephone, email or in person.

Should you not be satisfied with the outcome of our investigation of your complaint you have the option of contacting the Credit Ombudsman Service Limited (of which CT MONEY Pty Ltd are members) on:

Freecall: 1800 138 422

Phone: 02 9273 8400

Fax: 02 9273 8440

Email: [info@creditombudsman.com.au](mailto:info@creditombudsman.com.au)

CT MONEY Pty Ltd do not to charge any fee in respect to any complaint.

## TIMELINESS

We will provide a written acknowledgement of receipt of your complaint within 2 business days, unless the complaint is otherwise resolved in the meantime.

We will ensure that a substantive response is given to your complaint as soon as possible, but within forty five (45) days of receipt of your complaint.

If we cannot respond to your complaint within forty five (45) days, we will inform you of the reasons for the delay and of your right to refer the complaint to the Credit Ombudsman Service.

We will have substantially responded to your complaint if we:

- (a) Accept the complaint and, if appropriate, offer redress, or
- (b) Offer redress without accepting the complaint; or
- (c) Reject the complaint.

## WRITTEN RESPONSE TO A CUSTOMER

We will give you a written response to your complaint and the reasons for reaching a particular decision on the complaint and will adequately address the issues that are raised in your complaint.

Where practicable, our response will refer to applicable provisions in legislation, Codes, Standards or Procedures.

## REMEDIES

If we accept your complaint and are of the view that it is appropriate to offer redress to you, that redress may be non-financial as well as, or instead of, financial. If we consider that a financial remedy is appropriate then we will provide compensation for any direct loss or damage caused.

We will, when determining the appropriate remedy, take into consideration the extent of loss or damage suffered by you, relevant legal principles, the MFAA Code of Practice and other relevant codes of conduct and concepts of fairness and relevant industry best practice.

## DATA COLLECTION

We will keep data concerning your complaint in such form and manner as we think fit and will enable analysis according to:

- (a) Type of complaint;
- (b) Subject of complaint;
- (c) Outcome of complaint;
- (d) Timeliness of response.

Subject to legal constraints including constraints as to privacy, we will make available data collected in respect of your complaint to the Australian Securities and Investments Commission.

## REVIEW

We will review our Internal Dispute Resolution Procedures at least every three (3) years to ensure that our complaints systems are operating effectively. This document was reviewed on 15 December 2010.