

Pengana Capital Group offers clients Internal and External Dispute Resolution Procedures.

Wherever possible we would prefer to resolve complaints or disputes through our Internal Dispute Resolution (IDR) process. If we can't, we will refer you to our External Dispute Resolution Scheme, the Australian Financial Complaints Authority (AFCA).

How you can make a complaint

You can complain orally or in writing.

How long will the process take?

We will deal with your complaint as quickly and efficiently as we can. In most cases we aim to have the complaint resolved within five business days. Some complaints can be resolved more quickly depending on the facts and the nature of the complaint.

Generally, we must provide a final response to a complaint within 30 calendar days. However, if the investigation cannot be completed in this time because:

- a) resolution of is particularly complex; and/or
- b) circumstances beyond the Pengana's control are causing delays

we will provide you with a 'IDR delay notification' that informs you about:

- a) the reasons for the delay;
- b) you right to complain to AFCA if you are dissatisfied; and
- c) the contact details for AFCA

Investigation Process

The following process will be followed to review and investigate your complaint:

- (i) Once a complaint is communicated to Pengana, we will review your complaint to ascertain the key issues.
- (ii) We may ask you to provide additional information to help us investigate the complaint. We encourage you to provide us with as much information as you can to help our investigation.
- (iii) We will undertake an internal investigation based on the information provided in your complaint, contacting you if we need any additional information.
- (iv) We will keep in regular contact with you while the complaint is being investigated.
- (v) After we have considered all the information available, we will either:
 - (a) agree that the complaint is justified and offer a remedy;
 - (b) offer a remedy without agreeing that the complaint is justified; or
 - (c) reject the complaint and provide reasons for such rejection.
- (vi) Remedies may range from an apology to financial compensation. Where a financial remedy is considered appropriate, the aim is to provide fair compensation for any actual loss suffered;
- (vii) Where the complaint has taken more than five business days to resolve, we will provide you with a formal notification of the outcome of the investigation. We will also provide a formal outcome on request, where resolution has occurred within five business days.

If you feel that our response to your complaint is insufficient, you can take your complaint to the External Dispute Resolution Scheme (AFCA). We will provide you with their details to enable you to pursue your complaint through them.