



SETCH GROUP PTY LTD

COMPLAINT MANAGEMENT NOTICE

Date of issue 11 July 2026 – version 1

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Table of Contents

Commitment and Culture 3

Visibility and Accessibility 3

No Charges or Detriment 4

Approach and Methodology 4

Independence and Fairness 4

Privacy and Confidentiality..... 4

Assistance to make a complaint..... 5

Acknowledging a complaint 6

Timeframes..... 6

1. Introduction

Setch Group Pty Ltd ('Setch') has established a complaints management framework of which this Complaint Management Notice is the cornerstone. Our complaints management framework helps to ensure that the complaints we receive are dealt with genuinely, promptly, fairly and consistently.

This document sets out our approach for dealing with any expression of dissatisfaction that meets the definition of 'complaint' set out in AS/NZS 10002:2014: see ASIC Regulatory Guide 271.27.

2. Scope and application

This document applies to Setch and its related bodies corporate and appointed authorised representatives and financial advisers (when acting on their behalf), together and separately ("we", "us", and "our").

All Setch employees, directors, managers, contractors, authorised representatives, product distributors, and consultants in all of Setch's businesses and subsidiaries must comply with this Policy.

3. What is a complaint?

AS/NZS 10002:2014 sets out the following definition of 'complaint':

[An expression] of dissatisfaction made to or about an organization, 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.

4. The complaints management process

If you have a complaint about financial services provided to you, your complaint can be directed to Setch through your financial adviser in the first instance. You can also raise your complaint at any time by contacting our Head of Compliance. Please refer to Section 7 'Making a Complaint'.

5. Complaints handling principles

Commitment and Culture

- Setch's frameworks and procedures ensure that senior management is actively interested in and supportive of effective complaints management.
- Setch's executives lead by example to create an organisational culture where complaints are valued and managed appropriately.
- Setch's culture recognises that everyone has a right to complain; therefore, we are open to receiving complaints while contemporaneously demonstrating a commitment to resolving complaints through action.
- Setch encourages all staff to treat complainants with respect, be helpful and adopt a user-friendly approach to complaint management.

Visibility and Accessibility

- Setch encourages complaints and has established an Internal Dispute Resolution process to make it easy for people to voice their concerns through a number of mechanisms.
- Setch's processes include publicising information about how and where complaints may be made in multiple channels.
- Setch's complaint process is flexible about how complaints are lodged and offers multiple lodgement methods—including telephone, email, letter, social media, in person, or online.
- Setch ensures that the information provided to the public about the Internal Dispute Resolution process is easy to understand and use, including people with a disability or language difficulties.

No Charges or Detriment

- Setch's complaints resolution process is free of charge. This means that all complainants are able to make or pursue complaints through the complaint resolution process and incur no cost.

Approach and Methodology

- All complaints are captured consistently, even where they are resolved at the initial contact with us. This helps us improve our systems, processes, products and services.
- We acknowledge receipt of each complaint within 24 hours or a reasonable timeframe. Timeliness is central to effective complaint management and is a key performance measure of Setch's Internal Dispute Resolution process.
- We have systems and reporting procedures to ensure timely and effective complaint management and monitoring.
- We seek to resolve the matter to your satisfaction where possible. If we cannot agree on a solution, we will clearly explain our position and provide escalation avenues.
- Complaints trends are reported to ensure organisation-wide visibility and continual operational improvement.

Independence and Fairness

- Setch manages complaints objectively and without actual or perceived bias. The responsibility for complaints is given to staff not involved in the subject matter of the complaint.

Privacy and Confidentiality

- Setch has in place processes and systems to ensure that we comply with our obligations under privacy laws when dealing with complaints.
- Setch is committed to protecting the privacy and security of our clients and colleagues. This includes respecting client confidentiality in relation to complaints and adhering to our Privacy Policy.

6. Who can make a complaint?

Complaints can be received from clients, their authorised representatives and various other stakeholders.

We will not exclude complaints received from third parties and we will accept complaints from complainants as defined in ASIC Regulatory Guide 271 (as a minimum).

These can include (and may not be limited to):

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| • an existing account holder | • an executor of an estate |
| • a past account holder | • a legal representative |
| • a client's nominated financial adviser or an authorised representative | • an authorised third party |
| • a trust beneficiary | • a superannuation fund beneficiary |
| • a superannuation member's employer | • a trustee of a self-managed superannuation fund |

If you would like further details about who can make a complaint, please contact us.

7. Making a complaint

If you have a complaint or would like to express dissatisfaction with our services you may contact us online, by phone, email, or in writing.

Website: www.setchgroup.com.au

Email: clientservice@setch.au

Phone: 1300 001 385

Postal Address:

Level 17, Chifley Tower, 2
Chifley Square

Sydney NSW 2000

All complaints whether utilising social media channels or accounts owned or controlled by Setch that is the subject of the post, where the author is both identifiable and contactable, will follow the IDR process.

When lodging a complaint Setch will ask you to provide the following information to assist us in responding and investigating your complaint promptly:

- Your name;
- Your preferred contact details and method of contact (phone, email, etc); and
- Details of the complaint or issue including:
 - the service or product;
 - the nature of your concern;
 - any information you believe would assist us to understand and investigate your complaint further; and
 - details of the outcome you are looking to achieve or how best we can address your feedback.

Assistance to make a complaint

Setch encourages complaints and has established processes to make it easy for people to voice their concerns by developing an Internal Dispute Resolution system that is readily accessible and easy to use. Moreover, Setch proactively identifies people who might need additional assistance.

We recognise that intellectual disability, mental health disorders, or cultural or linguistic differences can make it difficult for certain clients to advocate for themselves when making a complaint. These conditions can also make it difficult for people to maintain an interest in their complaint to provide further information when asked. Setch has established processes for dealing with clients requiring special assistance. Employees have been instructed to show a readiness to deal with a guardian, friend, advocate, or another person who acts, with appropriate authority, on behalf of a client. We can also engage translation services if required.

8. How we handle complaints

We value all complaints and aim to respond to you promptly.

Additionally, we recognise complaints can be urgent and involve a level of stress, so we will assess and prioritise complaints according to the severity of the issues raised. When dealing with complaints, our IDR process ensures that the principle of fairness underpins the investigation and outcome of the complaint.

Fairness ensures that you have the right to:

- be heard with empathy and compassion;
- know whether we have complied with legal and regulatory requirements;
- request all relevant material to support the complaint;
- be informed about Setch's policy;
- be informed about other avenues for further review including referral to the relevant EDR schemes of which we are a member;
- be provided with a response to the complaint including our decision and reasons for that decision;
- know that the complaint is being reviewed independently within Setch by our senior compliance staff; and
- confidentiality and privacy are maintained in accordance with the law.

Acknowledging a complaint

We will acknowledge your complaint/expression of dissatisfaction within 24 hours (or one business day) of receiving it, or as soon as practicable. Setch may acknowledge a complaint verbally or in writing (email, post, or social media channels), depending on what the complainant requires. When determining the appropriate method of communication, Setch will consider the method used by the complainant to lodge their complaint and any preferences they may have expressed about communication methods.

Timeframes

If you refer your complaint to us, we will work with you to resolve your complaint within the maximum timeframe prescribed by ASIC Regulatory Guides 271 below:

Complaint type	Maximum timeframe for IDR response	More information
Standard complaints	No later than 30 calendar days after receiving the complaint.	RG 271.56
Complaints about superannuation death benefit distributions	No later than 90 calendar days after the expiry of the 28-calendar day period for objecting to a proposed death benefit distribution referred to in s1056(2)(a) of the Corporations Act.	RG 271.80 – RG 271.85

There are many variables that can affect complaint response times. This includes the complexity of the issues raised and the availability of information, including from third parties. If we realise that we will need more than the maximum timeframe to investigate and resolve a complaint, we will provide an 'IDR delay notification' which includes the reasons for the delay, your right to escalate a complaint to AFCA, and the contact details for AFCA.

9. Your options for review

Gill and Co Advisory Pty Ltd is also a member of the **Australian Financial Complaints Authority (AFCA)** – Membership Number – 103265, a free, fair, and independent dispute resolution scheme. If you are dissatisfied with the IDR outcome, you have the right to lodge a complaint with AFCA, contact details are below. You may also make a complaint via the Australian Securities and Investments Commission, free call Info line on 1300 300 630.

You can contact AFCA at:

Website: afca.org.au

Email: info@afca.org.au

Phone: 1800 931 678 (free call)

Postal Address:

Australian Financial Complaints Authority

GPO Box 3

Melbourne, VIC, 3001

If your complaint relates to a privacy matter and you are not satisfied with our response or if your complaint has not been resolved within 30 days, you can contact the **Office of the Australian Information Commissioner (OAIC)** at:

Website: oaic.gov.au

Email: enquiries@oaic.gov.au

Phone: 1300 363 992

Postal Address:

Office of the Australian Information
Commissioner

GPO Box 5288

Sydney NSW 2001