

(Unitholder) COMPLAINTS HANDLING POLICY AND PROCEDURE

Owner	GM – Risk & Compliance
Application	SCA Property Group incl SURF Funds
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Introduction

SCA Property Group (Group) comprises Shopping Centres Australasia Property Management Trust, Shopping Centres Australasia Property Retail Trust (together, Trusts), Shopping Centres Australasia Property Group RE Limited (Responsible Entity) and any entities owned and / or managed, either beneficially or legally, by the Trusts or the Responsible Entity, together with any managed investment schemes to which management services are provided by any entity owned by the Group

Objective

To ensure that all complaints are handled in a timely and thorough manner and any negative consequences of the complaint are minimised thereby maximising relationships with Unitholders and minimising adverse consequences for SCA Property Group.

In accordance with ASIC Regulatory Guide 165 – *Licensing: internal and external dispute resolution*¹ a “complaint” is defined 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.

Policy/Procedure

Each relevant SCA Property Group entity will outline this policy and the External Dispute Resolution Scheme of which it is a member in all offering documents it issues, so that investors are aware of the complaints procedures should they wish to make a complaint.

Receiving complaints: People may complain to SCA Property Group in any way that is convenient to the complainant whether in writing (received by post, fax or email) or verbally (over the phone or in person).

First response: All complaints received must be referred to the Compliance Officer (or in the Compliance Officer’s absence, to a director) who, will arrange for a written acknowledgement to be sent to the complainant as soon as possible.²

Register: The Compliance Officer must update the relevant Complaints Register and include the following details in that register:

- the name of the Fund / Group the Complaint is in respect of;
- the name and contact details of each complainant;
- the date and time each complaint was received;
- the employee to whom the complainant first spoke and a brief summary of that employee’s record of the conversation;
- all correspondence concerning the complaint;
- a report detailing how each complaint was resolved identifying and recording any systemic issues;
- any other information the Compliance Officer deems appropriate.

Investigation: The validity or not of the complaint is investigated by the Compliance Officer who may be assisted by the relevant Responsible Manager and/or external service provider.

¹ RG 165 refers to *AS 10002-2006 Customer satisfaction - Guidelines for complaints handling in organisations the applicable definition of “complaint”*

² See, for example, clause 33.1 of the SCA Retail Trust and SCA Management Trust Constitutions - being generally within 24 and no longer than 48 hours.

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Final Response: As soon as possible after completing the investigation and in any event within 45 days of receipt of the complaint either the Compliance Officer must send the complainant:

- a full response³; or
- if a final response cannot be sent, an update of progress and the timetable for a complete response.

The Compliance Officer, in consultation with a director of SCPRE, will determine the most appropriate person to sign the response.

Types of remedy available: The types of complaints SCA Property Group receives are highly varied and prescribing the set of responses is not appropriate. The Compliance Officer will review each complaint received and provide a tailored response.

External Dispute Resolution: The final response should inform the complainant that if they are not satisfied with the response, they have access, at no cost to themselves, to an external complaint resolution scheme, the Financial Ombudsman Service at:

Financial Ombudsman Service Limited
GPO Box 3
Melbourne Victoria, 3001
Toll Free 1300 780 808
Fax (03) 9613 6399
Email info@fos.org.au or visit website at www.fos.org.au

SCPRE is a FOS member - Member No. 31285 and
SURF RE is a FOS member – Member No.35982.

The Compliance Officer will be the person primarily responsible for dealing with the Financial Ombudsman Service Limited.

Policy/Procedure review: If the basis of the complaint is valid, the relevant policy/procedure or service provider agreement must be reviewed and necessary changes made to eliminate the cause of the complaint occurring again.

Reporting: All complaints will be reported on a quarterly basis to the ARMCC in respect of SCA Property Group and to the Board of SURF RE as appropriate.

Complaints not from Unitholders: This policy deals with complaints by Unitholders. If someone other than a Unitholder complains, then the person handling the complaint must attempt to follow the same complaint handling procedures as for Unitholders, except where it is unreasonable to do so. It is understood that complaints by tenants of property held by SCA Property Group or a fund managed by SURF RE will be dealt with on a case by case basis and that there can be no prescribed procedure. The General Manager Operations and General Counsel will together deal with tenant complaints and report to the relevant Board on significant issues.

Delegation: The Compliance Officer may delegate this function to another staff member who the Compliance Officer considers is appropriately qualified to handle complaints and who is supervised by the Compliance Officer in this role.

³ See, for example, clause 33.1(c) of the SCA Retail Trust and SCA Management Trust Constitutions

1. Form of Complaints Register

Complaint Number – (e.g. 2012-01)	
Name of Complainant	
Complainant’s contact details	
Date Received	
Summary of Complaint	
Date Reported to ARMCC	
Date of Acknowledgment	
Officer/Service Provider Subject of Complaint	
Relevant Policy/Procedure, Compliance Plan Item	
Date of Response	
Summary of Response	
Changes Required to Policies/Procedures, Compliance Plan	