

V J RYAN SECURITIES LIMITED

INTERNAL DISPUTE RESOLUTION POLICY

(PROFESSIONAL STAFF INFORMATION STATEMENT)

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VJ RYAN SECURITIES LIMITED

ABN 75 075 473 979

INTERNAL DISPUTE RESOLUTION POLICY (PROFESSIONAL STAFF INFORMATION STATEMENT)

This document sets out the policy of VJ Ryan Securities Limited (“VJ Ryan”) to receiving, acknowledging, responding, resolving and recording complaints concerning VJ Ryan (including its directors, staff, products and services). VJ Ryan is committed to efficiently and fairly resolving complaints. All staff are directed to willingly receive complaints whether by unitholders or members of the public and apply this policy to such complaint. We must endeavour to ensure all complaints are resolved promptly with a resolution mutually acceptable to both VJ Ryan and the complainant.

Any staff members who are unsure about their obligations or who require clarification of anything contained in this policy should speak to the Compliance Officer.

1 Fairness

VJ Ryan will endeavour to resolve complaints fairly to both the complainant and VJ Ryan. The complainant will generally have a right to:

- (a) be heard;
- (b) be informed of the process that will be applied to resolve the complaint;
- (c) be informed of the decision of VJ Ryan in response to the complaint and the reasons for the decision;
- (d) internal review of the complaint by directors or staff who are not the subject of the complaint;
- (e) if requested, have their complaint dealt with confidentially and
- (f) be informed of any avenue for appeal or further review.

2 Information for unitholders and members of the public

An information sheet on this policy (the VJ Ryan Securities Limited Internal Dispute Resolution Policy (General Information Statement)) is available for unitholders and members of the public. You must willingly provide a copy of the information sheet to a unitholder or member of the public upon request (without charge). The information sheet is available at www.vjryancmt.com.au. Details of how to make a complaint are also set out in the Financial Services Guide and Product Disclosure Statement for the VJ Ryan Cash Management Trust which are also available from its website.

3 Process

You must willingly receive a complaint. A complaint may be made in person or by letter, facsimile, e-mail or telephone. All written complaints should be referred to the Compliance Officer. (All references to Compliance Officer in this document should be read as referring to a director of VJ Ryan who is not the

subject of the complaint if the complaint concerns the Compliance Officer. The current Compliance Officer is Mr Peter Crawford).

You must provide all reasonable assistance to a person seeking to make a complaint. You must not demand that a complaint be in writing.

3.1 Receiving oral complaints

If a person seeks to provide a complaint in person or by telephone, you should:

- (a) identify yourself. If you do not consider it appropriate that you receive the complaint or the complaint is of a general nature and the complainant is not a unitholder for whom you are responsible, you should refer the complainant to the Compliance Officer.
- (b) encourage and allow the complainant the opportunity to express their concern.
- (c) record details including:
 - (i) the name and contact details of the complainant
 - (ii) the relationship of the complainant to VJ Ryan
 - (iii) the nature of the complaint
 - (iv) what the complainant wants
 - (v) what you consider would be an appropriate response/remedy
 - (vi) any agreed remedy
- (d) confirm the details received.
- (e) empathise with the complainant in a courteous manner.
- (f) do not attempt to lay blame, be defensive or argue.
- (g) if you conclude that the complaint is of a minor nature and that an appropriate response can be provided promptly at minimal cost, resolve the complaint. If not, inform the complainant that the complaint will receive prompt attention.

3.2 Informing Compliance Officer

You must promptly inform the Compliance Officer in writing of details of all complaints (including those details specified above). You must comply with all directions of the Compliance Officer concerning a complaint.

3.3 Responding to a complaint

You may orally discuss a complaint with a complainant (unless the complainant requests otherwise). However:

- (a) A copy of the VJ Ryan Securities Limited Internal Disputes Resolution Policy (General Information Statement) and a written acknowledgement of receipt must be forwarded to the complainant within 1 business day of receiving the complaint.

- (b) A letter confirming the response to/remedies provided in response to a complaint should be forwarded to the complainant within 10 business days of receiving the complaint.

The Compliance Officer must be provided with a copy of all such documents.

Complaints must be resolved and closed within 30 calendar days of receipt. In certain circumstances, such as where the resolution is complex, we can notify the complainant there will be a delay.

4 Confidentiality

If a complainant requests that a complaint remain confidential, you should inform the complainant that you are required to disclose the complaint to the Compliance Officer. You should disclose the complaint to the Compliance Officer. Otherwise, you should comply with the request and not disclose the complaint except with the prior consent of the complainant.

5 Charges

You must not charge complainants a fee for lodging a complaint or responding to/resolving a complaint.

6 Remedies

All remedies and responses to a complaint should be fair and reasonable to the complainant and VJ Ryan. To the extent possible, you should discuss possible remedies and responses with the Compliance Officer. The remedies may include:

- (a) an apology
- (b) provision of further information
- (c) refund of amounts paid
- (d) payment of compensation
- (e) provision of goods or services

7 Review and appeal

A complainant may refer a complaint to the Financial Ombudsman Service Limited. Their address is GPO Box 3, Melbourne, Victoria, 3001 and their call centre free telephone number is 1800 367 287.

The Compliance Officer will refer a complaint for independent assessment or for external dispute resolution if the Compliance Officer is unable to achieve a satisfactory resolution of the complaint within 10 business days.

8 Reporting IDR Data to ASIC

VJ Ryan is an "in scope" financial firm that is required to submit IDR reports to ASIC bi-annually for the following reporting periods of each year:

- 1 January to 30 June; and
- 1 July to 31 December.

We must lodge IDR reports within two months of each reporting period lapsing. This includes situations where there have been no complaints during the reporting period.

The Reports will be in the form required and approved by ASIC. It shall outline specified detail for each complaint received by us.

The staff member responsible for lodging IDR reports must follow the guidance provided in the ASIC *IDR Data Reporting Handbook* when lodging IDR data reports.

9 Resources

VJ Ryan is committed to ensuring sufficient resources are allocated to ensure compliance with this policy. If you consider you require any resources, please speak to the Compliance Officer.

10 Records

If a complainant is a unitholder, you must record and retain details of a complaint. If the complainant is not a unitholder, relevant documents should be forwarded to the Compliance Officer. The Compliance Officer will maintain records of all complaints in a complaint register (see Attachment A).

Reports of complaints will be regularly distributed to directors of VJ Ryan.

11 Systematic and recurring problems

The Compliance Officer will review the complaints register quarterly in order to identify and resolve and minimise systematic and recurring problems identified from complaints.

12 Accountability

Complaints will be considered in performance reviews and goal setting for all directors and staff.

13 Questions

If you have any questions, please contact the Compliance Officer.

DOCUMENT REVIEW AND APPROVAL

This document was approved by the Board of Directors of V J Ryan Securities Limited on 19 October 2023.

The date of the next review of this document is 31 October 2024 or such earlier date as may be required due to legislative changes/regulatory developments or for good governance.

Attachment A: Complaints Register

A complaint is any expression of dissatisfaction with a product or service offered or provided. Any complaint must be:

1. acknowledged and entered into this register within 2 days and
2. substantially responded to within 10 business days.

The Compliance Officer maintains this register.

Date complaint received	Date acknowledged	Date resolved (if applicable)	Type of complaint (Product or Service)	Name of Complainant	Complain details	Name of employee / representative	Staff involved in resolution	Status (e.g. With EDR/ Acknowledged/ Remedy)