



Complaints Handling Policy

September 2021

**Wealth Within Limited
ABN: 96 088 389 913
AFSL: 226347**

Overview

Wealth Within Limited is the responsible entity of the Direct Equity Managed Account Service (DEMAS) ARSN: 134 092 201. This policy relates to complaints about Wealth Within Limited and DEMAS.

It explains how you can make a complaint, our measures for handling your complaint, and the steps you can take if you are not satisfied with our response or the time it takes for us to respond to your complaint.

When we use the term “IDR”, we mean “internal dispute resolution”.

We acknowledge the importance of having an effective and efficient complaints handling and IDR framework, and we adopt a customer-focused approach. While we acknowledge your right to make a complaint, we expect that you will treat our staff with respect when they are dealing with your complaint.

This policy was adopted on 1 October 2021.




What is a complaint?

A complaint is:

“An expression of dissatisfaction made to or about us; related to our products, services, staff or our handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required”.

How to make a complaint

You can make a complaint to us in any of the following ways:

 Telephone	<ul style="list-style-type: none">• 1300 8585 272 or Melbourne direct 9290 9999• If calling from outside of Australia +613 9290 9999
 Email	<ul style="list-style-type: none">• portfolioadministration@wealthwithin.com.au
 Writing	<ul style="list-style-type: none">• PO Box 215, Warrandyte VIC 3113

When making your complaint please tell us:

- your name
- how you wish us to contact you (for example, by phone, email)
- what your complaint is about; and
- what you are seeking to resolve your complaint.

If you need help to make a complaint

If you need help to make or manage your complaint, you can appoint someone (for example, a relative or friend) to represent you. Please note that we will need your authority to speak to any representative that you appoint.

If English is not an investors first language and the investor does not feel comfortable using English, investors are able to call 131 450 from anywhere in Australia, 24 hours a day, 7 days a week to speak to a translator who can be provided by the Department of Immigration and Multicultural and Indigenous Affairs. There is a fee for this government service. Refer to the Translating and Interpreting Service (TIS) website: <https://www.tisnational.gov.au/>

How we will deal with your complaint

Acknowledgement

We will acknowledge receipt of your complaint and try to resolve it as quickly as possible.

Generally, where your complaint is made:

- verbally – we will acknowledge your complaint in the same manner [and, in writing, within one business day, or as soon as practicable];
- in writing – by email or via social media, we will acknowledge your complaint, in writing, within one business day or as soon as practicable thereafter.

When acknowledging your complaint, we will also have regard to any preferences you have communicated to us in relation to the way in which you wish for us to communicate with you.

Investigation of your complaint

If we cannot resolve your complaint immediately, we will need some time to investigate your concerns.

We may also request that you provide us with further information to assist with our investigation.

IDR Response

We will provide you with our written reasons for the outcome of your complaint (“IDR Response”) within the following timeframes where:

- your complaint is not resolved within 5 business days of us receiving your complaint; or
- if you request a written response.

No later than 30 calendar days after receiving your complaint.

Our IDR Response will also inform you of your right to escalate your complaint to the Australian Financial Complaints Authority (AFCA). AFCA offers a free and independent dispute resolution for financial complaints to individuals.

If we reject your complaint (whether in full or in part), our IDR Response will:

- identify and address the issues you raised in your complaint;
- set out our findings on the material questions of fact raised in your complaint, making reference to the relevant supporting information; and
- provide a sufficient level of detail in order for you to understand the reasons for our decision so that you can decide whether to escalate the complaint to AFCA or another forum.

We are not required to provide you with an IDR Response if:

- your complaint is resolved to your complete satisfaction within 5 business days and you have not requested an IDR Response; or
- within 5 business days of receiving your complaint, we have given you an explanation and/or apology in circumstances where we cannot take any further action to reasonably address your complaint.

Delay in providing an IDR Response

If we are not able to provide our IDR Response to you on time because of circumstances beyond our control, we will write to you to explain the reasons for the delay, and inform you of your right to complain to AFCA and provide you with AFCA's contact details.

Escalating your complaint

If you are not satisfied with our response to your complaint, you can escalate your complaint to AFCA whose contact details are below.

AFCA

Wealth Within is required to be a member of an external dispute resolution scheme. Accordingly, we are a member of AFCA and our membership number is 11348.

You can contact AFCA using the following details:

- Email: info@afca.org.au
- Phone: 1800 931 678 (or +61 1800 931 678 if calling from overseas)
- Online: www.afca.org.au
- Mail: GPO Box 3, Melbourne, VIC, 3001.