

# Dispute Resolution Policy

Lewis Financial is committed to dealing promptly, fairly, consistently and transparently with complaints from our clients in respect to our products, services, staff or the handling of complaints. This document sets out Lewis Financial's policy for dispute resolution.

## A. Introduction to Complaints Handling

### 1 Purpose

- 1.1 The purpose of Lewis Financial Services Licence Pty Ltd's ('Lewis Financial's') Dispute Resolution Policy ('Policy') is to ensure that your complaints in respect to our products, services, staff or the handling of a complaint are dealt with promptly, fairly and consistently in accordance with the *Corporations Act 2001* and *ASIC Regulatory Guide 271: Internal Dispute Resolution*.
- 1.2 This Policy represents Lewis Financial's commitment to fair and transparent dealings in the financial marketplace.
- 1.3 This Policy is drafted to comply with ASIC Regulatory Guide 271: Internal Dispute Resolution and Lewis Financial's obligations under sections 912A(1)(g) and 912A(2) of the *Corporations Act 2001* (Cth).
- 1.4 This Policy has been developed in accordance with the principles outlined in Australian Standard AS/NZS 10002:2014.

## B. Procedures

### 2 Making a Complaint

- 2.1 If you have a complaint about our products, services, staff, or the handling of a complaint, you should contact our Compliance team on 02 4751 4300 or at [info@lewisfinancial.com.au](mailto:info@lewisfinancial.com.au) to discuss it.

### 3 Receiving and Acknowledging Complaints

- 3.1 Lewis Financial's Compliance Officer will acknowledge receipt of the complaint within 24 hours (or one business day). Where this is not possible, acknowledgement will be made as soon as practicable.

### 4 Manner and Timeframe of Responding to Complaints

- 4.1 Lewis Financial will then investigate the complaint and respond to you within 30 calendar days for any standard complaint. Some complex matters may require more time to investigate thoroughly and bring to resolution. We will communicate progress with you.

**4.2** For complaints other than standard complaints, the following timeframes will apply:

- a. 45 calendar days for traditional trustee complaints,
- b. 45 calendar days for superannuation trustee complaints (except for complaints about death benefit distributions), and
- c. 90 calendar days after the expiry of the 28 calendar day objection period for complaints about superannuation death benefit distributions.

**4.3** Lewis Financial is not required to meet the above relevant maximum Internal Dispute Resolution ('IDR') timeframes if there is no reasonable opportunity for Lewis Financial to provide the IDR response within the relevant maximum IDR timeframe because resolution of the complaint is complex and/or circumstances beyond Lewis Financial's control are causing complaint management delays.

Before the relevant maximum IDR timeframe expires, Lewis Financial will provide you, the complainant with an 'IDR delay notification' that informs the complainant about the reasons for the delay, the complainants' right to complain to AFCA if dissatisfied and the contact details for AFCA.

**4.4** Examples of 'complexity' include when:

- a. the complaint is about a transaction or event that occurred more than six years ago and requires reconstruction of account information, and
- b. a complaint about a superannuation death benefit distribution which involved multiple submissions from potential beneficiaries with competing information about the status of relationships or levels of financial dependence.

**4.5** Examples of circumstances that may be beyond Lewis Financial's control include when:

- a. the complainant is waiting on a medical appointment that Lewis Financial reasonably requires the complainant to attend,
- b. the complainant is unable to respond to the financial firm due to illness or absence,
- c. information must be obtained from third parties to a complaint, and

d. a death benefit decision-maker is waiting on information requested from potential beneficiaries to a death benefit to substantiate their claim.

**4.6** Unless the complainant requests a written response, Lewis Financial is not required to provide an IDR response to a complainant if Lewis Financial closes the complaint by the end of the fifth business day after receipt because Lewis Financial has:

- a. resolved the complaint to the complainant's satisfaction, or
- b. given the complainant an explanation and/or apology when Lewis Financial can take no further action to reasonably address the complaint.

**4.7** The Lewis Financial IDR response consists of written communication from Lewis Financial to you, informing you, the complainant, of:

- a. the final outcome of your complaint at IDR (consisting of either confirmation of action taken by Lewis Financial to fully resolve the complaint or reasons for rejection or partial rejection of the complaint),
- b. your right to take the complaint to AFCA if you are not satisfied with the IDR response, and
- c. the contact details for AFCA.

## C. External Dispute Resolution

### 5 Australian Financial Complaints Authority ('AFCA')

**5.1** If you are not fully satisfied with our response, you have the right to lodge a complaint with the Australian Financial Complaints Authority (AFCA). AFCA provides fair and independent financial services complaint resolution that is free to consumers.

**5.2** The contact details for AFCA are:

**Phone:** 1800 931 678 (free call)  
**Online:** [www.afca.org.au](http://www.afca.org.au)  
**Email:** [info@afca.org.au](mailto:info@afca.org.au)  
**Post:** GPO Box 3,  
Melbourne VIC 3001