



INTERNAL DISPUTE RESOLUTION POLICY

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Owner	Head of Compliance
Key Stakeholders	

1. PURPOSE

The purpose of this policy is to provide guidance for the staff of Atrium Investment Management (“**Atrium**”) on the processes in place to ensure that obligations in relation to identifying and reporting complaints can be met. This policy, regulatory references (noted below) and periodic training is intended to provide staff with the necessary tools to comply with the obligations.

Regulatory References

The Corporations Act 2001 - s.912A – s942B

Corporations Regulations 2001

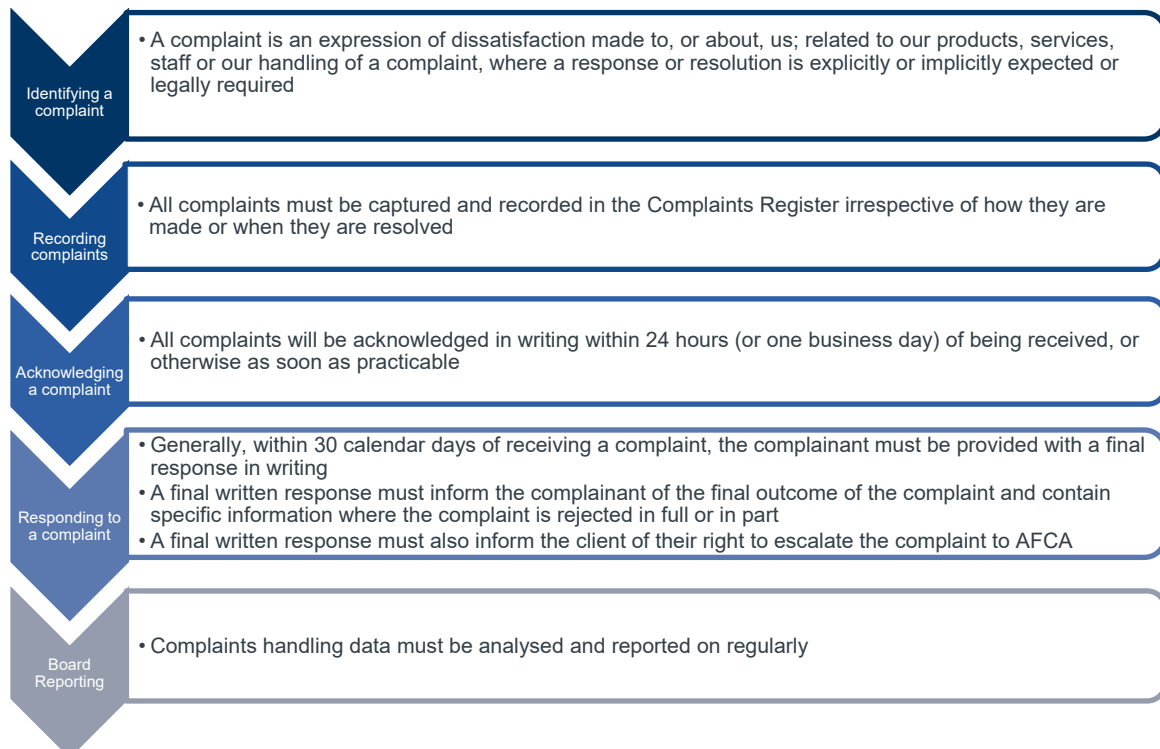
Australian Standard 10002:2014

Regulatory Guide 271: Internal dispute resolution

Regulatory Guide 267: Oversight of the Australian Financial Complaints Authority

2. DISPUTE RESOLUTION

Atrium follows the following steps in its internal dispute resolution process:



3.1 IDENTIFYING A COMPLAINT

ASIC expects that Licensees will deal with complaints in accordance with Australian Standard 10002:2014 which defines a complaint as:

“A complaint is an expression of dissatisfaction made to, or about, an organisation; 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.”

Atrium takes a proactive approach to identifying complaints. A complainant is not required to expressly state the word ‘complaint’ or ‘dispute’ for us to deal with the matter in accordance with this policy.

3.2 RECORDING COMPLAINTS

Complaints do not need to be made in writing. They can be made by phone, email, social media post or in person. If a complaint is received by way of a social media channel, the FPW Marketing team must liaise with Client Investment Services to act on their behalf.

3.2.1 Complainant representative

A complainant may appoint a representative to act on their behalf in relation to lodging and resolving a complaint; a third party authority from the complainant to liaise with their appointed representative must be collected.

Where a complainant appoints a representative, the complainant must not be contacted directly, unless:

- the complainant specifically requests that we directly communicate with them.
- we reasonably believe that the representative is not acting in the complainant’s best interests.
- we reasonably believe that the representative is acting in a deceptive or misleading manner with us or the complainant. or
- we reasonably believe that the representative is not authorised to represent the complainant.

3.3 ACKNOWLEDGEMENT OF COMPLAINT

Irrespective of how the complaint is received, the complaint (along with any relevant information) must be logged in the Complaints Register by the recipient immediately after receiving the complaint.

The Head of Compliance (or equivalent) will acknowledge the complaint in writing within 24 hours of receiving the complaint unless the preference of the complainant is to communicate verbally. The complainant must be informed that they have the option to escalate the complaint to AFCA.

3.4 RESPONDING TO A COMPLAINT

3.4.1 Responsibilities

The Head of Compliance (or equivalent) is ultimately responsible for responding to a complaint. However, some of the following tasks can be delegated to other staff members:

- Contact the client to understand the issues they have raised, talk them through the process to manage their expectations and understand if there are any issues that might necessitate any special treatment depending on their circumstances.

- Investigate the facts.
- Communicate with internal stakeholders, obtain sign off in line with delegations and draft response/s.

3.4.2 Time Frame

Typically, Atrium must provide an IDR response within 30 days. However, if certain circumstances exist Atrium is not required to provide a complainant with an IDR response within the relevant maximum IDR timeframe:

- 1) there must be no reasonable opportunity for the Atrium to provide the IDR response within the relevant maximum IDR timeframe because:
 - (a) resolution of the individual complaint is particularly complex and/or
 - (b) circumstances beyond the Atrium's control are causing complaint management delays.
- 2) before the relevant maximum IDR timeframe expires, the Atrium must give the complainant an 'IDR delay notification' that informs the complainant about:
 - (a) the reasons for the delay;
 - (b) their right to complain to AFCA if they are dissatisfied; and
 - (c) the contact details for AFCA.

3.4.3 Written Response not required

A final response in writing does not need to be provided if the complainant has not requested a written response and, by the end of the fifth business day after the complaint was received, Atrium has:

- resolved the complaint to the complainant's complete satisfaction; or
- given the complainant an explanation and/or apology in circumstances where we cannot take any further action to reasonably address the complaint. The Head of Compliance is responsible for determining whether such circumstances exist.

Where reasonably practicable, the Head of Compliance or their delegate will obtain confirmation in writing from the complainant that the complaint has been resolved to the complainant's complete satisfaction, or that they do not wish to pursue their complaint further.

3.4.4 Written Response required

A final written response must inform the complainant of the final outcome of the complaint which will consist of:

- acceptance of the complaint and, where appropriate, offering a remedy; or
- offering a remedy without accepting the complaint; or
- rejecting the complaint (in full or in part);

where the complaint is rejected (in full or in part), Atrium must:

- identify and address the issues raised by the complainant;

- set out the findings on the material questions of fact, making reference to relevant supporting information;
- provide sufficient detail for the complainant to understand the reason(s) for the decision so the complainant is fully informed when deciding whether to escalate the complaint to AFCA or another forum;
- inform the complainant that they have the right to take the complaint to AFCA and provide the complainant with AFCA's contact details.

3.5 REPORTING

The Head of Compliance will report to the Board of Directors a summary of complaints on a quarterly basis. An analysis of any systemic issues must be highlighted in the report.

4. TRAINING

The Compliance Manager is responsible for training staff to enable them to meet the obligations of this Policy and the procedures regarding the reporting and escalation of complaints and subsequent management of remedial actions.