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Complaints Handling Policy

Dated: 1 August 2019

Eclipse Prudent Mortgage Corporation Limited referred to in this Policy as “**Eclipse**” considers that adequately dealing with complaints from its investors and borrowers is essential to the fair provision of financial services. We are committed to providing high quality services and products. As an organisation we value and respect the relationships we have with our borrowers and investors.

We are committed to acting honestly and with integrity in all of our business interactions and expect our staff to do the same. A robust complaints handling policy is a key element to ensuring we meet our compliance and regulatory obligations.

What does this Policy Cover	
Item	Description
Key Principles of the Complaints Handling Policy	Eclipse is committed to the efficient and fair resolution of complaints.
Identifying a 'complaint'	Any expression of dissatisfaction with a product or service provided by Eclipse.
Dealing with a complaint	Eclipse will deal with a complaint within 21 days of receipt of the complaint, and provide a final determination within 45 days at the latest.
Complaints Handling Officer	Eclipse has two designated Complaints Handling Officers , the Investor Complaints Handling Officer and the Borrower Complaints Handling Officer. The Investor Complaints Handling Officer is responsible for maintaining the Investor Complaints Register and for managing investor complaints in accordance with this Policy. The Borrower Complaints Handling Officer is responsible for maintaining the Borrower Complaints Register and for managing borrower complaints in accordance with this Policy.
Complaints Register	<p>The Investor Complaints Handling Officer is responsible for maintaining an Investor Complaints Register which will be updated on receipt of a complaint from an investor and throughout the complaints resolution process, in accordance with this Policy.</p> <p>The Borrower Complaints Handling Officer is responsible for maintaining a Borrower Complaints Register which will be updated on receipt of a complaint from a borrower and throughout the complaints resolution process, in accordance with this Policy.</p>

Section 1 Key Principles for Complaints Handling

Eclipse strives to ensure that due care and utmost diligence is applied in the design of its products and the provision of services to its borrowers and investors. We recognise that complaints do arise. Moreover, complaints provide both improvement opportunities and insights into borrowers and investors expectations.

The Principles that Eclipse will abide by when handling a complaint are as follows:

- i. Eclipse is committed to the efficient and fair resolution of complaints (in this context 'fairness' means fairness to both the complainant and the person complained about).
- ii. Eclipse appoints designated Complaints Handling Officers who will have responsibility for logging complaints in the Complaints Register and for managing and resolving complaints.
- iii. Borrowers and Investors are informed of our Complaints Handling Policy which is made available to them.
- iv. Eclipse employees are required to follow this Policy and will take reasonable steps to ensure employees comply with this Policy.
- v. Eclipse aims to deal with complaints quickly and courteously.
- vi. The Complaints Handling Officer, in consultation with the Eclipse CEO, has the capacity to determine and implement remedies to complaints/disputes. However, where the resolution of a complaint/dispute has financial implications, the Complaints Manager will consult and seek approval from the Eclipse CEO.
- vii. Complaints data is collected and recorded in a Complaints Register which sets out all the required information to be collected in relation to a complaint.
- viii. Complaints are reviewed by the Group Head of Risk and Compliance on a quarterly basis and reported to the Board so that systemic or recurring problems are identified and rectified.
- ix. Any queries about this Policy should be directed to the Group Head of Risk and Compliance.

This policy is to be read in conjunction with the Eclipse Privacy Policy which also refers to complaints handling procedures in regards to privacy matters and data breach incident reporting.

Section 2 What is a Complaint

Eclipse considers a complaint to be any expression of dissatisfaction with a product or service offered or provided by it, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected. A complaint differs to an "enquiry" which tends to be a request for information about a product or service provided by Eclipse. An enquiry is a factual request and does not reflect dissatisfaction.

Where there is any doubt whether or not a communication received either verbally or in writing constitutes a complaint, the matter must be reported to the Group Head of Risk and Compliance, who will make further investigations and determine it to be a complaint or otherwise.

Regardless of the nature of the borrower or investor's complaint, there should be a positive and respectful attitude and a commitment to having the complaint resolved as soon as practicable.

Section 3 Dealing with a Complaint

All complaints whether written or verbal must be communicated to the Complaints Handling Officer immediately, or as soon as practicable, on receipt of a complaint.

If an Eclipse employee or representative receives a complaint from a borrower or investor:

- i. they must record all relevant details and immediately escalate the complaint to the Complaints Handling Officer;
- ii. the Complaints Handling Officer must record details of the complaint in the Complaints Register;
- iii. the Complaints Handling Officer must acknowledge receipt of the complaint either via a return phone call, email or letter;
- iv. the Complaints Handling Officer must ensure the complaint receives proper consideration; and
- v. the Complaints Handling Officer must use reasonable endeavours to deal with and resolve the complaint.

Responsibility for acknowledging complaints in the first instance rests with the Complaints Handling Officer. All complaints (whether verbally or in writing) will be acknowledged within 5 days of receipt of the complaint or within the timeframe stipulated in the relevant disclosure document, such as the PDS.

- Subject to the nature of the complaint, Eclipse will try to resolve the complaint to the borrower or investor's satisfaction as soon as possible. While most matters can be resolved quickly, more complex issues may take longer.
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- Eclipse aims to resolve complaints within 21 days. If Eclipse is unable to resolve the complaint to the borrower or investor's satisfaction, Eclipse will communicate the following items to the complainant as soon as practicable, no later than 45 days after Eclipse received the complaint:
 - i. the determination in relation to the complaint;
 - ii. the remedies, if any, available to the borrower or investor; and
 - iii. information regarding any further avenue for complaint, if any, including details of our external dispute resolution system membership.

NB: The 45 day timeframe to provide a final response does not recommence where new information is provided in respect of the complaint.

All complaints must be recorded in the Complaints Register, which will capture, as a minimum the following information:

- i. Date when the complaint was received
- ii. Complainants name
- iii. Recipient of the complaint
- iv. Fund Name/product to which the complaint relates
- v. Nature of the complaint
- vi. Summary of the complaint, including method of receipt
- vii. Summary of the final response
- viii. Final outcome, including dates
- ix. Date complaint closed

Refer to section 5 for what happens if we are unable to resolve the complaint.

Section 4 Monitoring and Reporting of Complaints

The Eclipse CEO and the appointed Complaints Handling Officer are responsible for maintaining the Complaints Register and for periodically monitoring it to ensure any issues or concerns are being escalated and addressed in a timely manner.

The Group Head of Risk and Compliance will ensure that a copy of the Complaints Register is presented to the relevant entity Board on a quarterly basis.

It is important to note that some complaints may constitute or reveal a breach or incident, which must then also be dealt with under the Incident and Breach Policy and logged in the Incident and Breach Register.

Section 5 Dispute Resolution

If you have a complaint about the service provided by Eclipse, you should contact Eclipse's Complaints Handling Officer:

- By email: complaints@rfecclipse.com
- By phone: (02) 9954 2211
- or by writing:

Complaints Handling Officer
Eclipse Prudent Mortgage Corporation Limited
Level 54, Governor Phillip Tower
1 Farrer Place
Sydney NSW 2000

The complaint will be forwarded to the Investor Complaints Handling Officer or the Borrower Complaints Handling Officer, depending on the nature of the complaint.

If an issue has not been resolved to your satisfaction, you can lodge a complaint with the Australian Financial Complaints Authority (**AFCA**) of which we are a member. AFCA provides fair and independent financial services complaint resolution that is free to consumers.

AFCA has authority to hear certain complaints. Contact AFCA to confirm if they can assist you.

Time limits may apply to complain to AFCA and so you should act promptly or otherwise consult the AFCA website to find out if or when the time limit relevant to your circumstances expires.

You can contact AFCA:

- By phone: 1800 931 678 (free call)
- By email: info@afca.org.au
- By writing: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001
- By visiting: www.afca.org.au