



Complaint Handling Policy

INTRODUCTION

Ardent Leisure Group (including its associated entities)(the **Group**) is committed to ensuring that it's operating entities, its directors (of all Group entities) and employees treat all complaints received by the Group in a consistent and fair manner.

Under the Corporations Act 2001, all managed investment scheme constitutions are required to provide for a complaints handling procedure, and under its Financial Services Licence (**AFSL**) conditions, the Manager must be a member of an external complaints resolution scheme approved by ASIC.

PURPOSE

The Group's complaints handling procedure is to be used in the event of an inquiry or complaint about the Group. Using the Group's complaints handling procedure will ensure that legislative and AFSL conditions are met and further that any investors' complaints and inquiries are dealt with in a timely and appropriate manner.

This Policy is aimed at providing an efficient and fair resolution of all complaints and recognises that a complainant has a right to be heard, should be informed of the process to be used and be given reasons for the final remedy or decision.

Complainants also have a right to have the complaint reviewed independently and where possible have the complaint kept confidential.

This Policy also acknowledges that the Subject of a complaint should also have the right to collect sufficient information about the complaint to enable the complaint to be properly investigated and be given reasons for the final remedy or decision.

This Policy covers all complaints/inquiries and is not limited to those relating to Ardent Leisure Trust.

POLICY

All complaints are to be handled in accordance with the procedures below. Responses must be within timeframes set out below. All complaints (whether verbal or written) must be recorded in the appropriate Complaints Register.

DEFINITION OF A COMPLAINT / INQUIRY

A complaint is an expression of dissatisfaction made by a client or customer (or someone representing their interests), about our products or services where a response or resolution is explicitly or implicitly expected.

A matter raised by a person over the telephone that is handled without the need for a response to that person and that does not warrant any further attention is not a "complaint" under this Policy but is rather defined as an inquiry.



Even if no further response needs to be given to a person who has raised a particular matter, that matter may deserve further attention, perhaps because the circumstances of the complaint are unusual or the matter is part of a pattern of similar inquiries.

A complaint may be made by a person who is not an investor in the Group and may be received verbally or in writing.

TYPES OF COMPLAINT

For the purposes of internal reporting, each complaint is to be classified as either a Type 1 or Type 2 complaint having regard to the following criteria:

Type 1

- Complaint concerns a claim > \$100,000;
- Complaints that raise a material breach (alleged or actual) of a law or regulation by the Group, employees or contractors;
- Complaints that pose a material reputation risk for the Group such as a complaint disclosing the possibility of a class action;
- Complaint that highlights a systemic failure and/or control breakdown; and
- Complaints concerning a breach of privacy legislation.
- Type 2 complaints where the complainant is not satisfied with our final proposed resolution

Type 2

- Non investor relations complaints.
- All other complaints.

A complaint that has not been resolved to the client's satisfaction can be defined as a situation where a complainant expresses dissatisfaction with the outcome of a fully investigated complaint.

If the complainant raises new or additional matters requiring further investigation then this will not automatically result in a reclassification to a Type 1 complaint.

Employees dealing with a Type 1 complaint must immediately notify the Company Secretary and the notification should include as many details as are available at the time.

WHO SHOULD HANDLE A COMPLAINT OR INQUIRY?

All employees can deal with complaints received however, any Type 1 complaint or similar inquiry should be forwarded to the Company Secretary or if appropriate our registrars, Link Market Services Limited, for resolution.

DEALING WITH AN INQUIRY

If it is clear that the investor has received full information relating to their inquiry and that they are satisfied with the answer given, no further action relating to this procedure needs to be taken.

If an inquiry is received that is unable to be answered immediately employees should:



- Give the investor an estimate of when an answer will be given to them. This estimate should be no longer than 5 working days; and
- Advise details to the registrars, Link Market Services Limited, if applicable and request that the registrars deal with the inquiry.

At no time is the investor to be charged for the reply to an inquiry or complaint or for any duplicate documentation that may accompany the reply.

Best endeavours should be used to satisfy all inquiries within 14 days.

DEALING WITH A COMPLAINT

The complaint handling process is designed to be responsive to complaints by dealing with them quickly and in a courteous manner. Employees should note as much detail as possible and always ensure that contact details are collected from the complainant.

Upon receipt of a complaint in writing or verbally employees should:

- Give the investor an estimate of when an answer will be given to them. This estimate should be no longer than 5 working days; and
- Advise details to the registrars, Link Market Services Limited, if applicable and request that the registrars deal with the inquiry.

At no time is the investor to be charged for the reply to an inquiry or complaint or for any duplicate documentation that may accompany the reply.

Best endeavours should be used to satisfy all complaints within 14 days.

If an investor is not happy with the response to their complaint the matter should be referred to the Company Secretary.

DOCUMENTATION

The following information must be provided to the Company Secretary in relation to Type 1 complaints:

- Date complaint received;
- Method of complaint (writing, telephone, fax etc);
- The name of the person who received the complaint;
- Complainant's name;
- Details of the complaint;
- Date and method of response(s); and
- Date and details of final resolution.

REGULAR REVIEW

Analysis of the nature of complaints made will be undertaken from time to time to identify areas for product and service improvement.



REMEDIES

If required an appropriate form of remedy (including refunds, compensation and apologies) may be granted. When granting a remedy, the remedy must address all aspects of the complaint; be fair and reasonable and be considered in context of the appropriateness to others who may have a similar complaint.

REVIEW

Analysis of the nature of complaints will be undertaken by the Company Secretary half yearly to identify areas for service improvement or any recurring problems.

INTERNAL REPORTING

Regular reports will be submitted to the Group Audit & Risk Committee setting out the following details:

- Total number of Type 1 complaints received;
- Successful resolution; and
- Any systemic issues arising or trends noted.

STAFF TRAINING

To ensure that Group employees are adequately prepared to respond to complaints, relevant employees will be provided with access to this Policy and training in respect of the Group's approach to complaints handling.

External Dispute Resolution Scheme

The Group is a member of the Financial Ombudsman Service (**FOS**). FOS is an ASIC approved external dispute resolution scheme approved by ASIC to resolve consumer complaints with respect to a broad range of financial services and products (including managed investment schemes). FOS deals with complaints under the Investments, Life Insurance and Superannuation (ILIS) Terms of Reference and the Financial Industry Complaints Service (FICS) Rules. Copies of these guidelines can be found in Practice Note 2 "Dispute Handling Processes and Information Exchange".