

## Complaints Policy

### 1. Introduction

Abacus Group is a diversified Australian REIT with an investment portfolio concentrated in the Commercial property sector. Abacus is also the manager of Abacus Storage King, which invests in the self-storage sector and as operator provides self-storage solutions to customers.

This policy applies to:

- Abacus Group (ASX:ABG) means the stapled group incorporating Abacus Trust, Abacus Income Trust, Abacus Group Holdings Limited, Abacus Group Projects Limited, together with its controlled entities and related bodies corporate (as defined under the Corporations Act 2001).
- Abacus Storage King (ASX:ASK) means the stapled group incorporating Abacus Storage Property Trust and Abacus Storage Operations Limited, together with its controlled entities and related bodies corporate (as defined under the Corporations Act 2001).

The three trusts are registered managed investment schemes under the Corporations Act 2001 (Cth). The responsible entity for Abacus Trust and Abacus Income Trust is Abacus Funds Management Limited, a wholly owned subsidiary of Abacus Group Holdings Limited. The responsible entity of the Abacus Storage Property Trust is Abacus Storage Funds Management Limited, which is a separately licensed and wholly owned subsidiary of Abacus Group Holdings Limited.

We strive to ensure that we fulfil our obligations to our investors and stakeholders. However, we recognise that on occasion, mistakes or oversights may occur, or that users of our services may dislike or be affected by the service we have provided although we endeavour to avoid these instances. We take all such complaints seriously and aim to respond and resolve complaints in an expedient and fair manner. Under the law, you have a right to complain if you are not satisfied with any aspect of our service.

### 2. Purpose

This policy outlines our complaints handling framework, and the objectives and approach implemented to ensure all complaints are responded to and resolved in an effective manner.

The key objectives of this policy are to:

- Provide clear guidelines and procedures on dealing with investor complaints;
- Ensure fair, timely and effective dispute resolution; and
- Provide the ability to identify emerging or systemic issues and inform product and service delivery improvements by the Group.

### 3. What is a Complaint?

A complaint exists when:

- an investor in an Abacus Group or Abacus Storage King investment product who has acquired an interest in an Abacus investment product; or
- a person receives financial product advice from Abacus Group prior to becoming such an investor,

expresses dissatisfaction about Abacus Funds Management Limited or Abacus Storage Funds Management Limited in their capacities as responsible entities of managed investment schemes (each a licensee) or about an Abacus Group or Abacus Storage King product, a related service or such advice which is not resolved to their satisfaction on first contact with the relevant Abacus Group manager.

Expressions of dissatisfaction include complaints where:

- they are in the form of posts on a social media channel or account owned or controlled by the licensee where the author is both identifiable and contactable, and
- the complaint is about a matter that is the subject of an existing remediation program or about the remediation program itself.

## 4. Making your Complaint

### 4.1 External Registry service

BoardRoom Limited is Abacus Group and Abacus Storage King's designated external service supplier of Registry services. BoardRoom Limited is the first point of contact for investors to make enquiries, either in-person, in writing or email, or via telephone or fax.

The contact details for BoardRoom Limited are:

*Address:* Level 8, 210 George Street, Sydney NSW 2000

*Post:* BoardRoom Limited, GPO Box 3993, Sydney NSW 2001

*Email:* abacus@boardroomlimited.com.au

*Telephone:* 1300 139 440



*Facsimile:* 02 9279 0664

When contacting Boardroom, please quote your current address details and your Securityholder Reference Number (SRN) or Holder Identification Number (HIN) as shown on your Issuer Sponsored or CHESSE statements.

## 4.2 Head Office enquiries

If you prefer to contact Abacus Group or Abacus Storage King directly, the contact details for Head Office are:

*Address:* Level 13, 77 Castlereagh Street, Sydney NSW 2000

*Email:* [enquiries@abacusgroup.com.au](mailto:enquiries@abacusgroup.com.au)

*Telephone:* 1800 253 860 OR 02 9253 8600

*Facsimile:* 02 9253 8616

If you have trouble speaking English or require additional support in making your complaint, you can contact:

- Federal Government's Translating and Interpreting Service on 131 450. They will connect you to an operator who speaks your language within a few minutes and will be able to translate your complaint to us over the telephone. This service is free of charge for non-English speaking users.

## 5. Resolution

### 5.1 Receiving your complaint

- (a) complaints over the phone in most cases can be dealt with immediately.
- (b) written complaints will be acknowledged on receipt within 24 hours or one business day.
  - i. on receipt of your complaint, we will acknowledge and confirm what we understand to be the nature of your complaint and any other details we think are relevant to resolving your complaint.
  - ii. we will ask whether we have interpreted your complaint correctly and have all the key details you provided to us.
  - iii. we may also ask for more information or to clarify any aspect of your complaint if we believe we don't have sufficient information to address it. It will also set out the estimated date of our response.



Your complaint will be handled according to our Privacy policy, which is available on our website.

## 5.2 What action will we take in response to your complaint?

### Establishing facts and circumstances of your complaint

- (a) we will establish all facts and circumstances of the complaint.
- (b) this may entail discussions with you and/or appropriate third parties or representatives such as your financial adviser, custodian of our scheme property, or the unit registry, for example.
- (c) you may inspect any relevant material relating to your complaint unless to do so would prejudice us or any of our funds.

### Resolving your complaint

We will endeavour to resolve your complaint by the end of the fifth business day after receipt.

However, if:

- (a) you are not satisfied with our response; or
  - (b) you are requesting a written response,
- we will provide you with an **'Internal Dispute Resolution (IDR) response'**.

### IDR response contents

An IDR response will contain:

- (a) the final outcome of your complaint, either confirming the actions taken by us to fully resolve the complaint or reasons for rejection or partial rejection of the complaint;
- (b) your right to take the complaint to Australian Financial Complaints Authority (AFCA) if you are not satisfied with the IDR response; and
- (c) the contact details for AFCA.

### IDR response timeframes

A response proposing an appropriate resolution of the complaint must be sent to the complainant as soon as practicable but no later than 30 calendar days from receipt of the complaint.

### IDR Delay Notification

We will keep you informed on the progress of your complaint. However, if we cannot send an IDR response within 30 calendar days, we will provide you with an **'IDR Delay Notification'** before the **timeframe expires**. This will detail:

- (a) the reasons for the delay;
- (b) your right to complain to AFCA if you are dissatisfied; and
- (c) the contact details for AFCA.



## Referral to AFCA for resolution

- (a) A complaint may go through the IDR process but remain unresolved or may not be resolved within 30 calendar days. In such a case, we will:
- i. inform the complainant that they have a right to pursue their complaint with AFCA; and
  - ii. provide the complainant with details about how to access AFCA.
- (b) the IDR responses and IDR delay notifications will contain the details in paragraph (a).
- (c) if we have provided you with an IDR response but your complaint has remained unresolved and you have not escalated it to AFCA, we may decide to refer the complaint to AFCA. This requires your consent before we refer the complaint.

### 5.3 What happens if I'm not satisfied with the final response?

If an issue has not been resolved to your satisfaction or you are not happy with our final response, you can lodge a complaint with the Australian Financial Complaints Authority (AFCA). AFCA provides fair and independent financial services complaint resolution that is free to consumers.

*Address:* Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001

*Website:* [www.afca.org.au](http://www.afca.org.au)

*Email:* [info@afca.org.au](mailto:info@afca.org.au)

*Telephone:* 1800 931 678

*Facsimile:* 02 9613 6399

## 6. Related legislation and policies

*Corporations Act 2001(Cth)*

Privacy policy

Code of Conduct

Whistleblowing policy

## 7. Document Control

Effective: 31 March 2022

ABG Board approved: 31 March 2022

