



BRISCONNECTIONS

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BrisConnections Holding Trust and BrisConnections Investment Trust

Complaints Handling Policy

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Document Control Sheet

Document Contacts

The following people should be contacted for enquiries regarding this document.

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Version History

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1 Introduction

1.1 Purpose

This document defines the policies and approaches for handling complaints.

1.2 Scope

To inform investors, and the investment community generally, of the process for handling complaints in relation to BrisConnections Group.

1.3 Distribution

1.3.1 Audience

The following people/organisations have an interest in this document as nominated:

Person / Organisation	Intended Purpose
BrisConnections Directors and employees	Action
Investors	Noting

1.3.2 Restrictions on Distribution

This document is Public.

PUBLIC documents are intended for access by anyone.

1.4 Project Information

BrisConnections Management Company Limited (**BCMCL**) is the responsible entity of the BrisConnections Investment Trust (**BCIT**) and the BrisConnections Holding Trust (**BCHT**). Units in BCIT and BCHT are stapled and quoted on ASX as BrisConnections Unit Trusts (ASX code BCS) (**BrisConnections Group**).

BCMCL has delegated management of the day-to-day business affairs of BCIT and BCHT to BrisConnections Operations Pty Ltd, which is wholly owned by BCHT.

The respective compositions of the boards of all companies in the BrisConnections Group are identical unless the Board resolves otherwise in a particular case.

1.5 Definitions

Term	Meaning
BCS	BrisConnections

Term	Meaning
Trust, Fund or Scheme	Includes all Trusts, Funds or Schemes that BCMCL is responsible for.
Constitution	The constitution (as may be amended from time to time) of the Trusts, Funds or Schemes that the AFS Licensee is responsible for.
Complaints Handling Officer	In this Policy means the Company Secretary or such other person as appointed.
Privacy Officer	In this Policy means the Company Secretary or such other person as appointed.
Company Secretary	In this Policy means the Company Secretary of BCMCL.
FOS	Financial Ombudsman Service

1.6 References

Ref ID	Document No	Document Title
[Ref-01]	BC-GL-CHA-CG-0003	BrisConnections' Board Charter
[Ref-02]	N/A	Corporations Act 2001 (Cth)
[Ref-03]	BC-GL-POL-CG-0001	BrisConnections' Code of Conduct
[Ref-04]		
[Ref-05]		

1.7 Background and Overview

This Policy has been written having regard to the complaints handling requirements of BrisConnections Management Company Limited, a holder of an Australian Financial Services Licence (AFSL) and

- the Constitutions of the Trusts, Funds or Schemes managed by BCMCL;
- the Corporations Act 2001;
- the Privacy Act; and
- the guidelines set out in Australian Standard AS ISO 10002-2006 – Customer satisfaction - Guidelines for complaints handling in organisations.

The key objectives of this Policy are to:

- provide clear guidelines and procedures for dealing with customer complaints;
- ensure that complaints are dealt with promptly, efficiently and equitably; and
- ensure that systemic and recurring problems are identified and rectified.

This Policy applies to complaints made by or on behalf of an investor or security holder in a registered or unregistered managed investment scheme offered by BCMCL where:

- the managed investment may be listed on the ASX or unlisted;

- the complaint relates to units or securities (including their price, return, value, resale, or performance) or the management of a managed investment scheme by BCMCL; or
- the complaint relates to an AFSL held by BCMCL.

2 What is a Complaint?

The Australian Standard AS ISO 10002-2006 regarding complaints handling defines a complaint as any expression of dissatisfaction made to an organisation, related to its products, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected.

A complaint is considered to be any expression of dissatisfaction with a product or service offered by BCMCL or any expression of dissatisfaction with their investment in the Trusts managed by BCMCL.

Examples of the nature of complaints that may be received include:

- an investor not being satisfied with the level of their investment’s performance;
- not receiving a distribution cheque on time;
- not having their change of contact details recorded correctly;
- a customer continuing to receive marketing material when a request was made to not receive marketing material in the future, or for their details to be removed from any mailing list; and
- an investor not being satisfied with the way their personal information is being handled.

No matter the nature of a customer’s or an investor’s complaint there should be a positive attitude towards the customer or investor and commitment to resolving the complaint as soon as practicable.

3 Contact Details for Making a Complaint

Principal Point of Contact

Unless otherwise indicated, the relevant Complaints Handling Officer has been appointed as the main point of contact for making a complaint.

General contact details are:

Telephone: 07 3170 1900

Facsimile: 07 3170 1911

Email: enquiries@brisconnections.com.au

Registry

BCMCL has appointed Link Market Services Limited to provide registry services to the Trusts, managed by BCMCL and to act as the main point of contact for investors to make enquiries or complaints (other than complaints relating to privacy) in respect of their investments in the Trusts managed by BCMCL.

The contact details for the registry, is as follows:

Link Market Services Limited

Phone: 02 8280 7609 or 1800 236 994

Facsimile: 02 8280 8489

Postal address: Locked Bag A14, Sydney South NSW 1235

Street address: Level 12, 680 George Street, Sydney NSW 2000

Investor documentation will note Link Market Services Limited as the main point of contact for making a complaint. However, investors may direct a complaint to BCMCL in the first instance.

Privacy

Complaints relating to privacy should always be directed to BCMCL in the first instance.

The contact details for the relevant Privacy Officer are as follows:

Telephone: 07 3170 1900

Facsimile: 07 3170 1911

Email: enquiries@brisconnections.com.au

Mail: BCMCL Privacy Officer

Level 2

Kedron Brook Building

1 Gympie Road

Kedron QLD 4031

For further information about privacy issues and the protection of privacy, visit the Australian Federal Privacy Commissioner's website at <http://www.privacy.org.au>

4 General Guidelines for the Resolution of Complaints

Procedures for handling a complaint are set out below.

Complaints from customers or investors in the Trusts managed by BCMCL may be received by telephone, facsimile, in person, by written letter or by email.

When a complaint is received it must, as soon as practicable:

- be acknowledged in writing;
- be dealt with appropriately and within a reasonable time frame having regard to the nature of the complaint; and
- the investor or customer should be provided with the following information:
 - the decision made by BCMCL and any further avenue of complaint – i.e. – FOS or Federal Privacy Commissioner; and
 - the remedies (if any) available to the customer or investor.

The remedies that may be available to the customer or investor will depend on the nature of their complaint and the rules of the relevant Trust. By way of example, the remedies could include, as may be applicable, any one or combination of the following:

- information and an explanation of the circumstances giving rise to the complaint;
- an apology; and
- correcting any error that may have occurred.

The following time frames should be adhered to when dealing with complaints:

- The initial response (being the first contact made with the investor after the complaint is received) for a written complaint should be within 10 business days;

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- The initial response for a verbal complaint received should be within 10 business days; and
- Where possible all complaints should be resolved within 30 business days of being received.

Where necessary, the relevant Complaints Handling Officer will direct the investigation and preparation of a response to a complaint to the relevant officer or manager.

All complaints answered in writing must contain the following paragraph:

“BCMCL is a member of an independent dispute resolution scheme, the Financial Ombudsman Service (“FOS”). If you feel your complaint remains unresolved or you wish FOS to further investigate your complaint, you can contact FOS as detailed below:

Financial Ombudsman Service

GPO Box 3

Melbourne VIC 3001

Telephone: 1300 780 808

Fax: +61 3 9613 6399

Internet: <http://www.fos.org.au>

Email: info@fos.org.au

All complaints answered in writing relating to privacy must contain the following paragraph:

“If you feel your privacy complaint remains unresolved or you wish the Privacy Commissioner to further investigate your complaint, you can contact the Office of the Privacy Commissioner as detailed below:

By telephone: 1300 363 992 (local call anywhere in Australia)

In writing: Office of the Privacy Commissioner

GPO Box 5218

SYDNEY NSW 1042

By email: privacy@privacy.gov.au

4.1 Complaints Received from Link Market Services Limited

All complaints received by Link Market Services Limited, whether verbal or written, should be:

- recorded in a Complaints Register; and
- forwarded to the relevant Complaints Handling Officer within 24 hours of being received.

If a verbal complaint is received it is important to:

- record the investor’s details (i.e. – name of investor, contact number, name in which the investment is held, etc) and confirm these details with the investor;
- understand and confirm the nature and details of the complaint. If the nature of the complaint is complex, the investor should be requested to submit their complaint in writing. (Note that an investor or customer should be encouraged to provide such information and assistance required to enable BCMCL to understand the nature of the complaint and the extent to which the investor’s rights have been adversely affected); and
- resolve the complaint if possible or commit to a course of action.

All dealings with investors should be in a courteous and friendly manner – no attempt should be made to lay blame or be defensive.

On being advised of a complaint the relevant Complaints Handling Officer should draft a letter to the investor within 10 business days:

- acknowledging the complaint; and
- committing to a course of action – i.e. – if the complaint is relating to the provision of information readily available then the complaint should be resolved immediately. If the complaint needs further investigation or the course of action is unknown, the investor should be advised that further investigation is required and specify a time frame in which they will be contacted about their complaint.

The CEO or Company Secretary should review and approve the draft letter prior to being sent. The complaint should be followed up as often as necessary in order to achieve a satisfactory outcome with the investor.

All complaints answered by Link Market Services Limited in writing must contain the following paragraph:

“BCMCL is a member of an independent dispute resolution scheme, the Financial Ombudsman Service (“FOS”). If you feel your complaint remains unresolved or you wish FOS to further investigate your complaint, you can contact FOS as detailed below:

Financial Ombudsman Service

GPO Box 3

Melbourne VIC 3001

Telephone: 1300 780 808

Fax: +61 3 9613 6399

Internet: <http://www.fos.org.au>

Email: info@fos.org.au

The Complaints Register should be updated regularly to enable the status of a complaint to be readily ascertained at any point in time. Ultimately, the Complaints Register should record all action taken in respect of the complaint received and when it has been resolved.

4.2 Complaints received by BCMCL

If a verbal complaint is received directly by BCMCL, either in person or over the telephone, the investor should be referred to the Complaints Handling Officer. If the Complaints Handling Officer is not available to speak to the investor, the investor’s name and contact details should be taken and the investor advised that they will be contacted as soon as possible.

The staff member attending to the investor should identify themselves to the investor. A record of the complaint must be recorded in the Complaints Register that is kept with the Complaints Handling Officer so that follow up action can be recorded.

All written complaints received should be forward directly to the Complaints Handling Officer for recording in the Complaints Register and actioning. The Complaints Handling Officer should then follow the procedures set out in Section 4.0 of this Policy.

4.3 Unresolved Complaint

Any complaint not resolved within 30 business days of being received should be referred to the CEO, the Company Secretary and the Compliance Officer.

If necessary, the customer or investor should be advised as follows:

- the reasons for the delay;
- if necessary, monthly updates will be provided on the progress of the resolution of their complaint; and
- a date when a decision can reasonably be expected.

If still no resolution is forthcoming the complaint should be referred to FOS or the Privacy Commissioner (refer to 4.4 below).

4.4 External Complaints Resolution

BCMCL is a member of the Financial Ombudsman Service (FOS), an external industry complaints resolution scheme. The Complaints Handling Officer is responsible for ensuring that membership is renewed each year. Any complaints (other than privacy complaints) not resolved within 45 days of being received will be referred to FOS.

If a privacy complaint is not resolved satisfactorily within 45 days of being received the complaint should be referred to the Privacy Commissioner pursuant to Section 36 of the Privacy Act.

4.5 Charges

Subject to any statutory requirements, complaints handling will be conducted at no charge to the investor making the complaint.

4.6 Monitoring of the Complaints Register

Link Market Services Limited and the Complaints Handling Officer maintain the Complaints Register. The Complaints Register records who the complaint was from, the nature of the complaint and the action taken to resolve the complaint.

The Compliance Officer reviews the Complaints Register regularly and reports to the Scheme Compliance Committee each quarter in respect of:

- the number of complaints received;
- resolution of complaints in accordance with the Complaints Handling Policy and the Constitution/Trust Deed; and
- as necessary, complaints of a significant or systemic nature.

Escalation of complaints will occur if the resolution is not proceeding in accordance with the Complaints Handling Policy, as determined by the Compliance Officer. If the Compliance Officer identifies a complaint of a recurring nature, it will be investigated (including advising the CEO and Company Secretary) and if possible appropriate action taken to prevent the cause of the complaint from occurring in future.

4.7 Disclosure

These complaints handling procedures will be outlined to customers and investors through customer and investor reporting such as PDS's, Financial Services Guides and Annual Reports published by BCMCL.

A copy of this Policy and the Privacy Policy will be made available free of charge to customers or investors on request and via BCMCL's web site.

4.8 Review of this Policy

A review of this Policy will be undertaken annually by the Compliance Officer and the Complaints Handling Officer to take account of any changes to the nature of the businesses of BCMCL, the Constitutions of the Trusts managed by BCMCL, the Corporations Act 2001 (including ASIC Policy), the Privacy Act and the guidelines set out in Australian Standard AS ISO 10002-2006 – Customer satisfaction - Guidelines for complaints handling in organisations.