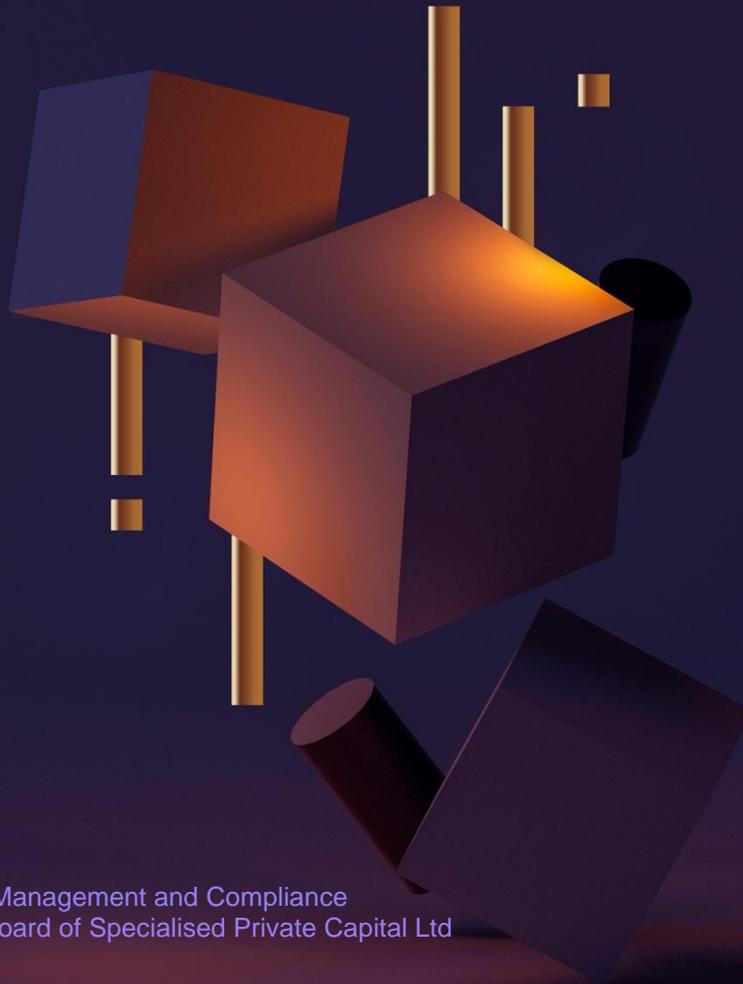




SPECIALISED
PRIVATE
CAPITAL

Complaint Management Policy

March 2026



Version 1.6
Date: 5 March 2026
Policy owner: Risk Management and Compliance
Approved by: The board of Specialised Private Capital Ltd

Level 24, 1 O'Connell Street
Sydney NSW 2000

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Version	Date Board approved	Comments
Version 1.0	5 October 2021	Initial policy incorporating the requirements of RG271.
Version 1.1	15 November 2021	Minor updates to the policy.
Version 1.2	19 August 2022	Change of address.
Version 1.3	10 November 2022	Annual Review.
Version 1.4	14 November 2023	Annual Review.
Version 1.5	4 December 2025	Policy Review.
Version 1.6	5 March 2026	Minor update to include Wholesale clients and rebranding for Specialised Private Capital.

1. Purpose

Specialised Private Capital Ltd (ABN 095 773 390 AFSL 246744), a part of the Findex Group, strives to provide the highest quality professional service to its clients. Specialised Private Capital encourages client feedback on a regular basis and acknowledges a client's right to make a complaint.

The Specialised Private Capital Complaints Management Policy (Policy) provides guidance on how Specialised Private Capital manages complaints relating to its products, services, staff or the handling of a complaint and potential complaints which may be made against it or its staff. This Policy also provides guidance on how Specialised Private Capital handles complaints in its capacity as promotor of a superannuation fund with an external trustee. The objective of the policy is to assist all representatives, including dedicated complaints handling staff in resolving complaints in an efficient, effective, and professional manner.

In preparing this Policy, Specialised Private Capital aims to align its processes and procedures with the relevant legal requirements and current best practice. In particular, with the following:

- 'Australian Standard AS 10002:2022 Guidelines for complaint management in organisations'.
- ASIC Regulatory Guides in place for Internal dispute resolution including:
 - Regulatory Guide 271 *Internal dispute resolution* (RG 271).
 - Regulatory Guide 267 Oversight of the Australian Financial Complaints Authority (RG 267).
 - Internal dispute resolution data reporting framework (see 22-071MR).

2. Scope

The Policy applies to all Specialised Private Capital Senior Executives, Directors, employees, secondees, consultants and contractors (collectively 'Staff Members') within Specialised Private

Capital. This Policy also applies to third party administrator(s) and other entities within the Index Group supporting Specialised Private Capital in complaint management.

Specialised Private Capital products covered by this Policy include, but are not limited to:

- Specialised Private Capital Funds
- Centric IDPS
- Centric Managed Accounts.

This Policy also covers Centric's responsibilities in its capacity of promotor of Centric Super.

Centric, as operator of an IDPS and promotor of a super fund, must also take reasonable steps to facilitate dispute resolution between members and financial product issuers of underlying securities, including, for example, by informing members about the product issuer's dispute resolution procedures and providing evidence of the investor's holding or transfer of financial products to the investor or product issuer or seller (if required).

Where units in a Specialised Private Capital Fund are held on any platform or a nominee and custody service, indirect investors have the same rights of complaint as they would have had about the issue or sale and the provision of financial services as if they had acquired units in the fund directly.

3. Definitions

3.1 What is a Complaint?

A complaint is "an expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required".¹

A response or resolution is 'explicitly expected' if a consumer clearly requests it. It is 'implicitly expected' if the consumer raises the expression of the dissatisfaction in a way that implies the consumer reasonably expects the firm to respond and/or take specific action. A consumer or small business is not required to expressly state the word 'complaint' or 'dispute', or put their complaint in writing, to trigger a financial firm's obligation to deal with a matter according to our IDR requirements".²

Under this definition of a 'complaint', expressions of dissatisfaction that are made about an organisation and its staff will constitute a complaint (including a complaint made on the firm's social media platform(s)). Staff Members should not ignore a complaint or categorise a complaint as "feedback", an "enquiry" or a "comment" where it meets the definition of a complaint as defined in this Policy.

3.2 What is not a Complaint?

For avoidance of doubt, the following are not considered to be 'complaints':³

- a) employment-related complaints raised by Specialised Private Capital staff; and

¹ RG 271.27

² RG 271.30

³ RG 271.33

- b) comments made about Specialised Private Capital where a response is not expected, such as:
 - i) feedback provided in surveys; or
 - ii) reports intended solely to bring a matter to a platform's attention

If you are unsure whether the client is making a complaint or making an enquiry, contact Risk Management and Compliance for guidance.

3.3 How to handle a Complaint

Staff Members should encourage clients to make complaints and make it easy for people to voice their concerns. They should proactively identify people who might need additional assistance in making a complaint and/or understanding this Policy. They should also prioritise complaints according to the urgency and severity of the complaint. The process to lodge complaints is flexible and multiple methods of lodging are offered to complainants—including telephone, email, letter, social media, in person, or online. Complaints do not need to be in writing. Refer to the Procedure for additional information.

3.4 What is a Potential Complaint?

A potential complaint is a situation where there is a possibility, due to fact or a circumstance that has arisen, that a client may make a 'Complaint'. In these instances, a response or a resolution by the client is NOT explicitly or implicitly expected (client is usually not aware at the time the fact/circumstance has arisen). A precautionary approach must be adopted when determining whether a matter is a potential complaint or not. If you are unsure whether a potential complaint exists, contact Risk Management and Compliance for guidance.

3.5 Key elements of a Complaint Management Process

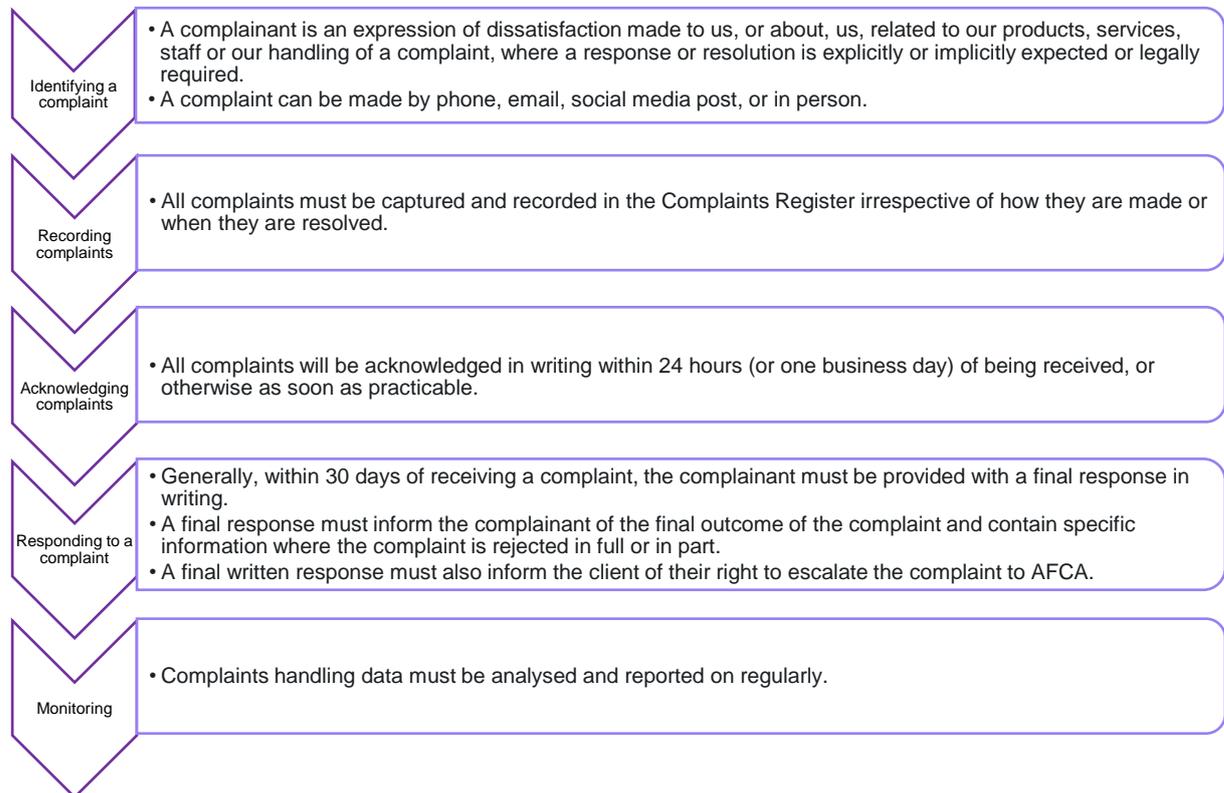
Specialised Private Capital is committed to providing an open and responsive resolution of complaints received in relation to the services it offers and has adopted the key elements outlined in AS 10002:2022 to achieve an effective complaints management process.

Element	Description
Commitment	Specialised Private Capital is committed to the efficient and fair resolution of complaints at all levels of the company. We recognise a client's right to complain if and when they feel that they have not received appropriate service or general advice from Specialised Private Capital or express dissatisfaction around a financial product.
Fairness	The premise of the Procedure is to treat any complaint in a fair manner, and that fair treatment applies not only to the client but also to Specialised Private Capital.
Resources	Specialised Private Capital has adequate resources for complaints handling and sufficient levels of delegated authority.

Visibility	The complaint handling process is publicised to consumers and staff that includes information to consumers about the right to complain to Specialised Private Capital and via third party providers like FNZ and State Street.
Access	Specialised Private Capital's Complaint Management Policy is available to clients upon request. Internally, it is available to all Staff Members on 'Findex Home'.
Responsiveness	Receipt of a complaint by Specialised Private Capital will be acknowledged promptly within 24 hours (or one business day), or as soon as practicable, and the complainant will be kept informed of the progress of its resolution. Complaints are to be dealt with quickly and complainants are to be treated courteously.
Objectivity	Any complaint received by Specialised Private Capital will be addressed in an equitable, objective, and unbiased manner. We recognise the need to be fair to both the complainant and the person (if applicable) whom the complaint is made.
Charges	There will be no charge to the complainant for making a complaint, subject to statutory requirements.
Confidentiality	Personally, identifiable information concerning the complainant will be used for the purpose of addressing the complaint within Specialised Private Capital and will be actively protected from disclosure, unless the complainant expressly consents to its disclosure.
Remedies	The complaint handling process has the capacity to determine and implement remedies such as compensation. These decisions are made by Specialised Private Capital Management and/or dedicated complaints handling staff.
Systemic and recurring problem	Complaints are analysed on a regular basis for the identification and rectification of systemic or recurring problems.
Accountability	All Staff Members accept responsibility for effective complaints handling. Where appropriate, issues raised in the Complaint Handling process are reflected in performance evaluations of the relevant Staff Member.
Assistance	Upon request, Specialised Private Capital will aid complainants in the preparation and lodgments of complaints.
Reviews	Specialised Private Capital complaints management process will be reviewed regularly to ensure it is efficiently delivering effective outcomes.

4. Complaint handling

4.1 Summary of Procedure



4.2 Superannuation

Centric may also act as the promotor of a superannuation fund with an external trustee (e.g., Centric Super). In these circumstances, complaints are managed in accordance with the trustee's Complaints Management Policy and any other relevant requirements they may have (e.g., business process document). This will usually involve the complaint being managed by Centric as promotor or by the administrator in the first instance with oversight by, and reporting of complaints to, the trustee. The trustee is required to accept and deal with complaints made by:

- members or former members of a regulated superannuation fund (but not an SMSF);
- people with an interest in an insurance contract where the premiums are paid from a registered superannuation account.
- beneficiaries with an interest in a death benefit⁴; and

⁴ ASIC considers an objection to a proposed decision about how and to whom to pay a superannuation death benefit distribution is a complaint.

- parties (and intending parties) to an agreement under the Family Law Act 1975 or order affecting superannuation, including:
 - a member, beneficiary or retirement savings account holder's spouse or former spouse who is party to an agreement, or subject to an order about that person's superannuation interest; and
 - someone eligible to request information about that superannuation interest.

4.3 Outsourcing

Specialised Private Capital may outsource part, or all, of its Internal Dispute Resolution (IDR) process. Outsourcing might be to external parties (e.g., FNZ as administrator for the Centric IDPS) or to other entities within a related corporate group (e.g. within the Findex Group).

When IDR is outsourced, Specialised Private Capital remains responsible for ensuring that the service provider's IDR process complies with this Policy. This includes documenting the process that the external party must follow for complaint management, agreed service level agreements, reporting of complaints as well as an annual review of the service provider. Specialised Private Capital will appropriately deal with any actions by service providers that breach service level agreements or fall short of their obligations under this Policy.

4.4 How can a complaint be made?

A complaint can be made verbally or in writing (email, post, or through our social media channels), alternatively please speak to your financial adviser about your concerns. **Note:** We can arrange for an interpreter to help you with understanding the policy and complaints requirements should you prefer speaking in your preferred language, subject to the availability of translator(s). Simply ask our staff for an interpreter when you call us.

Specialised Private Capital Funds

A complaint in relation to Specialised Private Capital managed funds (Specialised Private Capital Funds) can be made using the following details:

-  (02) 9250 6500
-  funds@specialisedprivatecapital.com.au
-  www.specialisedprivatecapital.com.au
-  Level 24, 1 O'Connell Street, Sydney NSW 2000

Other Products

A complaint in relation to all other products including:

- Centric IDPS
- Centric Super
- Centric Managed Accounts

can be made using the following details:



1300 223 687



support@centricwealth.com.au



PO Box 446 Flinders Lane VIC 8009

4.5 Required information

When lodging a complaint report, the following information should be provided by the Staff Member reporting the complaint:

- name of the Staff Member reporting the complaint.
- date complaint was received.
- date complaint was resolved (if applicable).
- name, position (if applicable), and contact details of complainant.
- complainant's relationship with Specialised Private Capital (i.e., nature of engagement with Specialised Private Capital).
- for investments, include the unitholder, portfolio or member number and investment product.
- nature of the complaint (including when the conduct giving rise to the complaint occurred).
- amount of compensation claim requested by the complainant (if applicable);
- details of the Specialised Private Capital Staff Member(s) involved in the complaint (if applicable); and
- copies of any documentation supporting the complaint.

4.6 Complainant's rights

Complainants have the right to enquire as to the status of their complaint by contacting the Staff Member who has been identified as managing the complaint. This person's contact details will be provided in the acknowledgment of the complaint.

4.7 Fee disputes

The Procedure also applies to clients that are disputing fees.

4.8 Supporting complaints on behalf of a client

Specialised Private Capital will forward complaints received in relation to any external products or advisers to the relevant product issuer or advice licensee with confirmation of their indirect holding. An example would be where a member of the Centric IDPS has a complaint regarding an underlying investment that they have invested in on the platform (i.e., they are not a direct investor in the product). For all other instances, Risk Management and Compliance is contacted for approval prior to forwarding any complaint.

Where reasonable and appropriate, Specialised Private Capital will act on behalf of a client who wishes to make a complaint against another entity. This may include providing holding or transaction statements in accordance with Specialised Private Capital Privacy Policy.

4.9 Remedies/Compensation

Any proposed resolution to complaint will go through Specialised Private Capital’s internal approval process.

Specialised Private Capital, at their discretion, may reduce a Staff Member’s incentive payment if the value of financial compensation or goodwill paid to the client/claimant is result of the Staff Member’s error/negligence and/or non-compliance with company policies and procedures.

4.10 IDR Response

The outcome from the investigation into the complaint is communicated to the complainant in writing (IDR response) within the required timeframe in the table below.

The IDR Response must include:

1. the final outcome of their complaint at IDR (either confirmation of actions taken by the firm to fully resolve the complaint or reasons for rejection or partial rejection of the complaint);
2. their right to take the complaint to AFCA if they are not satisfied with the IDR response; and
3. the contact details for AFCA.

Complaint type	Maximum timeframes for IDR response
Standard complaints	No later than 30 calendar days after receiving your complaint
Superannuation trustee complaints, except for complaints about death benefit distributions	No later than 45 calendar days after receiving your complaint
Complaints about superannuation death benefits	No later than 90 calendar days after the expiry of the 28-calendar day period for objecting to a proposed death benefit distribution referred to in section 1056(2)(a) of the Corporations Act 2001.

If Specialised Private Capital rejects or partially rejects the complaint, the IDR response must clearly set out the reasons for the decision by:

1. identifying and addressing the issues raised in the complaint.
2. setting out the findings on material questions of fact and referring to the information that supports those findings; and
3. providing enough detail for the complainant to understand the basis of the decision and to be fully informed when deciding whether to escalate the matter to AFCA or another forum.

The level of detail in an IDR response should reflect the complexity of the complaint and the nature and extent of any investigation conducted. The IDR response should not breach Specialised Private Capital privacy or other legislative obligations (e.g. ‘tipping off’).

Specialised Private Capital does not need to provide a written IDR response to a complainant if the complainant has not requested a written response, and if the complaint is closed by the end of the fifth business day after receipt because Specialised Private Capital has:

- a) resolved the complaint to the complainant's satisfaction. This could include the complainant confirming they are satisfied with the resolution or circumstances exist to make it reasonable to form this view; or
- b) given the complainant an explanation and/or apology when Specialised Private Capital can take no further action to reasonably address the complaint.

4.11 Complaint management delays

Specialised Private Capital is not required to provide a complainant with an IDR response within the relevant maximum IDR timeframe if certain circumstances exist.

First, there must be no reasonable opportunity for Specialised Private Capital 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 Specialised Private Capital's control are causing complaint management delays.

Second, before the relevant maximum IDR timeframe expires, Specialised Private Capital 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 AFCA⁴.

4.12 External Dispute Resolution (EDR)

Retail clients

If the complainant is a retail client and their issue has not been resolved to their satisfaction, they can lodge a complaint with the Australian Financial Complaints Authority (AFCA) of which Specialised Private Capital is a member. AFCA provides a fair and independent financial services complaint resolution that is free to consumers.

Australian Financial Complaints Authority (AFCA)



1800 931 678 (free call)



info@afca.org.au



www.afca.org.au



GPO Box 3, Melbourne VIC 3001

Wholesale clients

Wholesale clients are not eligible for AFCA or equivalent external dispute resolution mechanisms. Specialised Private Capital will endeavour to resolve any complaint internally as promptly as possible and generally within the retail complaint timeframes (e.g. 30 days), subject to the nature and complexity of the matter. Wholesale clients may pursue independent avenues of dispute resolution where appropriate.

4.13 Record keeping

All details of the progress of the complaint, including client correspondence and file notes, are to be recorded.

A Complaints Register is maintained and reviewed at least annually by Risk Management and Compliance. The Complaints Register will be provided quarterly to the Board and Compliance Committee. Refer to the Procedure for additional information.

When closing a complaint, firms should record the complaint outcome, complaint remedy, and financial compensation amount (if any).⁵

5. Review

The Complaint Management Policy will be reviewed regularly, aimed at enhancing its delivery of efficient and effective outcomes. This review will be performed by Risk Management and Compliance.

Specialised Private Capital must also regularly review whether the IDR process is adequately resourced.⁶

⁵ RG 271.164

⁶ RG 271.142