

## Complaints Policy October 2023

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### 1. Dispute resolution

#### 1.1 Purpose

The purpose of this statement is to set out the internal dispute resolution (IDR) **procedure** and to outline how Morrison Securities Pty Ltd (**Morrison**) AFSL 241737 receives and deals with complaints.

This policy adopts RG271 that applies from 5 October 2021 (intended for Retail Clients, however Morrison only have direct Wholesale clients and also faces AFSL intermediaries under a B2B execution, clearing and settlement service) as there is a requirement for AFSLs to provide services fairly, efficiently and honestly.

It should be noted that the external dispute resolution (EDR) body Australian Financial Complaints Authority (AFCA) has the discretion under its own rules/procedure to also handle Wholesale clients, and not only Retail clients as was the original intent of regulators.

This policy also covers the ASIC complaints data reporting framework which is associated with RG271. This framework involves an IDR data dictionary and IDR data glossary, initially developed as a pilot framework trial with six-months reporting. Seen collectively, the ASIC IDR data cube and the AFCA EDR data cube will provide regulators/authorities with complaints data that identifies the firm publicly.

#### 1.2 Public website version

A public version complaints policy is also required to be published on the Morrison website.

#### 1.3 Dispute resolution system

- (a) The Complaint Handling Procedure sets out the dispute resolution process available to clients of Morrison.
- (b) The dispute resolution process is summarised as follows:
  - (i) If a client has a complaint about the service provided to them by:
    - A. An AFS Licensee of Morrison, the client is directed to contact the AFS Licensee client of Morrison and advise of their complaint as well as being informed that it is not a complaint that Morrison can deal with.
    - B. Morrison (rather than the AFS licensee who has arranged execution, clearing and settlement through Morrison) will address matters such as trading, system or settlement issues, then the client must be advised to do the following:
      - A written complaint addressed to Morrison Securities is to be sent by email to the Compliance Officer at [compliance@morrisonsecurities.com](mailto:compliance@morrisonsecurities.com)
      - A complaint can also be made on the social media platform if Morrison uses that platform.
      - Morrison will endeavour to acknowledge a complaint

received from a client via the appropriate channel within one business day.

- C. Morrisons will try to resolve the complaint quickly and fairly and provide an initial response within 5 business days of receipt, with a final response within 30 days of receipt.
- D. If the client still does not get a satisfactory outcome, then they have the right to complain to:

The **Australian Financial Complaints Authority (AFCA)**, which is the body that handles external disputes resolution. The contact details of AFCA are—

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

Mail: GPO Box 3, Melbourne, VIC, 3001

Phone: 1800 931 678 (or +61 1800 931 678 if calling from overseas)

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

- (ii) Morrisons is a member of AFCA, the external dispute resolution (EDR) body.
- (iii) Clients may call AFCA (as appropriate) which has a free call line which they may use to make a complaint and obtain information about their rights.
- (iv) Resolution of the complaint may include financial compensation and or requesting Morrisons to refund some or all of the money subscribed. Complaints may also result in a warning, or revocation of the appointment of a Representative, and or a refund of any commissions received. **Morrison is not a financial advice AFSL** however and does not provide personal financial advice either directly or indirectly. Certain types of disputes relate to the market operators and execution, clearing and settlement services provided by Morrisons to Intermediaries such as AFSLs who has the end-clients.
- (v) If the complaint may amount to a liability or potential liability upon which Morrisons may make a claim against its' professional indemnity insurance, Morrisons must immediately notify ASX and ASIC of any notification to its insurer of any claim, potential claim or circumstance that might give rise to a claim, and must include the following details:
  - A. any circumstance which is likely to give rise to a claim or potential claim against Morrisons;
  - B. the receipt of a notice from any person of any intention to make a claim or potential claim against Morrisons; and
  - C. the details of any claim, potential claim or circumstance against Morrisons including the gross contingent liability, the net contingent liability, the full name of the Morrisons insurer and the date Morrisons notified its insurer of the claim, potential claim or circumstance.

- (vi) All complaints will be recorded in a complaints register maintained by the Compliance Manager. This will include complaints that were satisfactorily resolved within 5 business days. The Compliance Manager will monitor the number and type of complaints to identify any systemic compliance issues, and undertake corrective action, including if appropriate, notifying ASIC.

#### **1.4 Complaints reporting internally.**

- (a) The Compliance Manager must report the complaint cases at the Compliance Meeting. Currently this is held bi-monthly.
- (b) The complaints report must address the following issues:
  - (i) Nature of each complaint.
  - (ii) Identity of the person against whom the complaint is made and any similar previous complaints.
  - (iii) Progress in investigation of each complaint.
  - (iv) Whether the complaint is considered to give rise to a breach of any compliance procedure (including any requirements of Morrisons' AFSL, the stock market operators' rules or the Corporations Act). If the complaint amounts to a breach, then the matter should be reported to the appropriate regulatory body and to Morrison' professional indemnity insurance.
  - (v) Outline a proposed strategy to handle the resolution of the complaint.

#### **1.5 Complaints data reporting ASIC framework**

- (a) An AFSL is required to also report the IDR complaints data following the data standards prescribed by ASIC in March 2022, in association with RG271 IDR. To enable this, the Complaints register is to follow the data standards set out by ASIC in order to be able to report that required type of data.
- (b) The frequency is expected to be every six months initially. ASIC may change this to quarterly reporting.
- (c) Systemic issues do not require reporting to ASIC initially. However, ASIC may later change this to be a requirement.
- (d) IDR complaints cases have to be identified uniquely. The ASIC IDR data cube will enable the regulator to track cases that have escalated to AFCA, which publishes an EDR data cube on their website showing data for each financial firm.
- (e) ASIC encourages a group to report the pro-forma complaints data collectively, rather than by individual AFSLs of the group.

## **1.6 External complaints reporting under DDO TMD.**

- (a) Morrisons as an Issuer of ETO PDS will also comply with the Design and Distribution Obligation (DDO) from 5 October 2021 for financial products issued to Retail clients who are the clients of Intermediary AFSLs. The Target Market Determination (TMD) determined by Morrisons may specify, among other things, the number of complaints are to be notified by Distributors to Issuers, and how frequently, such as when arising and/or within 10 business days of the relevant reporting period, which could be quarterly or six-monthly depending on the product TMD.
- (b) Morrisons as a stockbroker may also need to comply with Distributor obligations (if legally required to be treated as a Distributor under DDO, whilst it is providing execution clearing and settlement services under an Intermediary Agreement with AFSLs who owns the clients). One such distributor obligation is the TMD DDO complaints reporting to issuers.