

Sequoia Financial Group Complaints Policy

1. Overview

This public policy explains how you can make a complaint free of charge, our measures for handling your complaint, and the steps you can take if you are not satisfied with our response to your complaint or the time that it takes for us to respond.

When we use the term “IDR”, we mean “**internal dispute resolution**” which is mandatory for AFSLs with retail clients.

We acknowledge the importance of having an effective and efficient complaints handling and IDR framework, and we adopt a customer-focused approach. While we acknowledge your right to make a complaint, we expect that you will treat our staff with respect when they are dealing with your complaint.

This Complaints Policy will apply from 5 October 2021 and relates to RG 271, a regulatory guide on internal dispute resolution issued by ASIC.

2. Sequoia Group Entities

For the purpose of this Complaints Policy SEQ consists of the following Companies that have an AFSL (or Corporate Authorised Representatives of the AFSL, or arrangers) and their agents, officers, employees and financial advisers:

- Sequoia Corporate Finance Pty Ltd
- Sequoia Asset Management Pty Ltd
- Sequoia Wealth Management Pty Ltd
- Sequoia Direct Pty Ltd
- Sequoia Specialist Investments

Other Sequoia entities use their own specific public Complaints Policies.

3. What is a complaint?

A complaint is:

“An expression of dissatisfaction made to or about us; related to our products, services, staff or our handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required”.

4. Which firm to make a complaint to?

Please address your complaint to the company that provides the services to you

5. How to make a complaint

We will acknowledge receipt of your complaint and try to resolve it as quickly as possible.

Generally, where your complaint is made in writing – by email preferably, or via social media, or verbally, we will acknowledge your complaint within one business day or as soon as practicable thereafter.

We expect our clients to send their complaints in writing to the Complaints Officer at email Complaints@Sequoia.com.au rather than publicly involving the use of social media.

If we cannot resolve your complaint immediately, we will need some time to investigate your concerns. We may also request that you provide us with further information to assist with our investigation.

6. If you need help to make a complaint

If you need help to make or manage your complaint, you can appoint someone (for example, a relative or friend) to represent you. Please note that we will need your authority to speak to any representative that you appoint.

We can also arrange an interpreter for you, and help you to fill out forms or express your complaint.

7. IDR Response Time

We will provide you with our written reasons for the outcome of your complaint (“IDR Response”) within the following timeframes where:

- your complaint is not resolved within 5 business days of us receiving your complaint;
- if you request a written response

Standard complaints	No later than 30 calendar days after receiving your complaint.
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Note that if your complaint is made before 5 October 2021, and is an ongoing case, then the response time is 45 calendar days.

Our IDR Response will also inform you of your right to escalate your complaint to the **Australian Financial Complaints Authority (AFCA)**. AFCA offers a free and independent dispute resolution for financial complaints to individuals and small businesses. Small businesses are those with less than 100 employees.

If we reject your complaint (whether in full or in part), our IDR Response will:

- Identify and address the issues you raised in your complaint;
- Set out our findings on the material questions of fact raised in your complaint, making reference to the relevant supporting information; and
- Provide a sufficient level of detail in order for you to understand the reasons for our decision so that you can decide whether to escalate the complaint to AFCA or another forum.

We are not required to provide you with an IDR Response if:

- Your complaint is resolved to your complete satisfaction within 5 business days and you have not requested an IDR Response; or
- Within 5 business days of receiving your complaint, we have given you an explanation and/or apology in circumstances where we cannot take any further action to reasonably address your complaint.

8. Delay in providing an IDR Response

If we are not able to provide our IDR Response to you on time because your complaint is complex or because of circumstances beyond our control, we will write to you to explain the reasons for the delay, and inform you of your right to complain to AFCA and provide you with AFCA's contact details.

9. Escalating your complaint

If you are not satisfied with our response to your complaint, you can escalate your complaint to AFCA which is the external dispute resolution body for AFSLs.

10. AFCA

You can contact AFCA using the following details:

- Email: info@afca.org.au
- Phone: 1800 931 678 (or +61 1800 931 678 if calling from overseas)
- Online: www.afca.org.au
- Mail: GPO Box 3, Melbourne, VIC, 3001.