

Complaints Resolution Procedure

1. General Principles

- 1.1. Litigation Lending and its subsidiaries will follow the general principles set out by the Commonwealth Ombudsman in relation to Complaints Handling. A copy of the Better Practice Guide to Complaints Handling can be found [here](#).

2. Procedure

- 2.1. Complaints may be written or oral. If they are written, then the writing will be retained. If oral, then a statement of the oral complaint will be prepared as soon as the complaint is received. Written acknowledgment of receipt of the complaint, together with an explanation of the process involved in handling the complaint, will be provided to the complainant.
- 2.2. A statement must then be prepared by the person receiving the complaint. The statement must detail:
 - 2.2.1. the person making the complaint;
 - 2.2.2. details of the complaint itself;
 - 2.2.3. facts relevant to the validity or otherwise of the complaint; and
 - 2.2.4. how the employee or officer intends to handle the complaint.
- 2.3. A copy of the statement and any written complaint must then be delivered to the CEO of Litigation Lending within 10 business days of receipt of the complaint. If the complaint is directed towards the CEO then the employee or officer must instead provide the statement and copy of the complaint to the Chair of the Board of Litigation Lending. In this case, all references to 'CEO' in subsequent clauses (aside from clause 2.9) will instead be substituted with 'Chair of the Board of Litigation Lending'.
- 2.4. The employee receiving the complaint should, in the first place, then attempt to deal with the subject of the complaint, remembering the following basic principles:
 - 2.4.1. the right of the person to make a complaint and to be involved in the process;
 - 2.4.2. the fact that the reputation of Litigation Lending in part depends upon how the complaint will be handled; and
 - 2.4.3. the requirement to be as fair as possible to the complainant (including being impartial, transparent and treating the complaint confidentially) while at the same

time, remembering that there is an obligation to protect the interests of Litigation Lending and its subsidiaries.

- 2.5. If the employee/officer deals with the complaint to the satisfaction of the complainant then the employee/officer will provide a report to the CEO in relation to how the complaint has been handled and the result.
- 2.6. During the course of handling the complaint the employee/officer must provide the complainant with the name of a contact person and an invitation to contact him or her directly.
- 2.7. If, after 7 days have elapsed from the receipt by the CEO of the initial statement from the employee/officer, no resolution report has been received, then the CEO will liaise with the employee/officer in order to work towards resolution of the complaint.
- 2.8. If the CEO becomes involved in the resolution of the complaint then a report on that resolution will be prepared once the complaint has been resolved. That report should detail the steps taken by the CEO and the outcome of the complaint procedure.
- 2.9. The CEO will set up and maintain a complaints file upon which will be included:
 - 2.9.1. the statements under clause 2.2; and
 - 2.9.2. the resolution reports under clauses 2.5 and 2.8.
- 2.10. If no resolution has been achieved within 21 days of the date the CEO becomes involved, then the matter will be taken over by the CEO.
- 2.11. The CEO will liaise with the employee/officer to determine the procedure to deal with the complaint. That procedure may include a meeting between the complainant and the employee/officer and the CEO to discuss the complaint.
- 2.12. If the complaint is resolved by the employee/officer or the CEO then a written statement as to the outcome of the complaint will be provided to the complainant. That statement will include any reasons for decision by the employee/officer or the CEO.
- 2.13. If you are still dissatisfied with the outcome, you may be able to refer your complaint to an independent alternative dispute resolution process once you have been through our internal complaint process. We will let you know how you may do

this and whether other options are available when we provide our final response to you.

3. Disclosure of Complaints Procedure

3.1. A copy of this complaints procedure will be posted on Litigation Lending's website (www.litigationlending.com.au) and will be kept up to date.

3.2. The complaints handling procedure is to be without charge to any complainant. Where costs are incurred (such as time and travelling costs) then they will be written off to general overheads. Litigation Lending will keep a separate accounting for any out of pocket expenses in relation to complaints so that an assessment can be made from time to time as to the cost of the procedure.

4. Remedies

4.1. All remedies proposed will be a matter for discussion and decision between the employee/officer handling the complaint and the CEO.

5. External Dispute Resolution

5.1. LLSIM is a member of the Australian Financial Complaints Authority (AFCA) which is a specialist in external dispute resolution.

5.2. Whenever a retail complaint is elevated to the level of the CEO, the complainant must be advised in writing of LLSIM's membership of the AFCA and contact details for AFCA.

5.3. LLSIM's membership of the AFCA will be referred to on its website.

6. Statistics and Internal Audit

6.1. The CEO will provide a report to Litigation Lending's Audit & Risk Committee each quarter, detailing the substance of any complaints (new and ongoing) and the status of handling of the complaints.

6.2. The CEO will extract on an annual basis a report to the Board in relation to:

LLS Investment Management Pty Ltd | ABN 79 628 631 854 | AFSL 524167
Suite 28.02, Level 28, Bligh Chambers, 25 Bligh Street, Sydney NSW 2000
www.litigationlending.com.au | +61 2 9051 9990

- 6.2.1. complaints made during the period;
- 6.2.2. resolution of such complaints;
- 6.2.3. an assessment of the type of complaints being made; and
- 6.2.4. any recommendations in relation to the business of Litigation Lending as a result of the complaints or the types of complaints being made.

7. Document Details

7.1. Responsibility: CEO

7.2. Document history:

Version	Date	Authorised by:
1.0	29/01/2021	LLS Board of Directors
1.0	18/02/2022	LLS Board of Directors
1.1	29/11/2022	Chief Executive Officer (website formatting only)
1.1	3/03/2023	LLS Board of Directors