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Internal Dispute Resolution Process

Contents

1. Introduction.....	3
2. Internal Dispute Resolution (“IDR”)	3
3. Defining a Complaint	3
4. How to Make a Complaint.....	3
5. Complaints Handling Procedure	4
6. Review.....	5

1. Introduction

ilInvest Trading & Advisory (**ilInvest**) is licensed to provide certain financial services as a corporate authorised representative of Zodiac Securities Pty Ltd (AFSL 398350). In accordance with s912A(1) and s912A(2) of the Corporations Act, ilInvest is required to have a dispute resolution system in place and ensure client complaints in respect of financial services are dealt with consistently, fairly and promptly.

2. Internal Dispute Resolution (“IDR”)

The IDR policy is in compliance with *ASIC Regulatory Guide 271: Internal Dispute Resolution* and provides details in respect of ilInvest’s process for handling client complaints. This process allows:

- ilInvest to resolve an issue with a complainant prior to any external escalation;
- ilInvest to identify and address systemic or repetitive issues which can assist in improving its products and services, and
- improved levels of client confidence and satisfaction in the financial services offered.

The ilInvest internal dispute resolution process is available to complainants free of charge. This Policy is available on the ilInvest website.

3. Defining a Complaint

A Complaint is defined as “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”.

This includes expressions of dissatisfaction concerning social media posts, where the author is identifiable and contactable.

4. How to Make a Complaint

There are a number of methods by which a client may make a complaint:

- Telephone

By dialling +61 7 5520 8788

- Email

By emailing info@iinvestadvisory.com

- Mail

Please write to:

The Compliance Officer
ilInvest Trading & Advisory Pty Ltd
PO Box 1092 Burleigh Heads QLD 4220

Please provide a detailed description of your complaint if mailing or emailing your complaint.

5. Complaints Handling Procedure

• Receiving Complaints

ilInvest will make all reasonable efforts to address all complaints in a professional manner and promptly. On receipt of the complaint, ilInvest will acknowledge receipt of the complaint within 1 business day or as soon as practicable.

• Investigating the Complaint

The compliance Officer will make all reasonable efforts to investigate all relevant circumstances and information concerning the complaint, make a determination and provide a written response to the complainant within 30 calendar days upon receipt of the complaint, or as soon as practically possible.

• ilInvest IDR Response

The Compliance officer will provide a written response to the complainant and include the following information:

- i. The final outcome of the dispute which can be either confirmation of actions taken to fully resolve the complaint or reasons for rejection or partial rejection of the complaint. Where the decision is made to reject or partially reject, the reasons will be set out in the response:
 - Issues in the complaint identified and addressed
 - Findings on material questions of fact and supporting information to back up those findings
 - Sufficient details for the complainant to understand the basis for the decision and be fully informed when deciding whether to escalate the complaint with AFCA or another forum
- ii. If the complainant is not satisfied with the IDR provided by ilInvest, the complainant may lodge a complaint with the Australian Financial Complaints Authority (“AFCA”). Details provided:

Website: www.afca.gov.au
Email: info@afca.org.asu
Phone: 1800 931 678
Mail: Australian Financial Complaints Authority
GPO Box 3, Melbourne VIC 3001

- iii. In situations where the complainant has not attempted to resolve the complaint directly with ilInvest in the first instance, AFCA may direct the complaint to ilInvest to provide a response in accordance with ilInvest's IDR process.

- **Complaints Resolved within 5 business days**

If a complaint has been resolved to the Complainant's satisfaction, or an explanation and/or apology has been provided where no further action is required, within 5 business days of receipt of the complaint, ilInvest is not required to provide an IDR response, unless at the complainant's request.

- **Exceptions to providing an IDR within the prescribed time frame**

There are many variables that may effect a complaint response time. This may include the complexity of the issues raised and the availability of information, including from third parties if required.

Possible reasons ilInvest may take longer than 30 calendar days upon receipt of the complaint to provide an IDR include, but are not limited to the following:

- There is no reasonable opportunity to provide the IDR response within the relevant timeframe due to the complexity of the resolution. For example, reconstructing account information for a trade that occurred more than 6 years ago, or
- Circumstances beyond ilInvest's control causes delays. For example, the complainant is ill or absent and unable to respond to ilInvest.

Under such circumstances, ilInvest must provide the complainant an 'IDR delay notification' with the following details before the relevant timeframe expires, ie 30 calendar days:

- The reasons for the delay
- The complainant's right to complain to AFCA if they are dissatisfied, and
- The contact details for AFCA.

6. Review

This IDR Policy will be reviewed on a regular basis to assess the efficiency and effectiveness of the ilInvest IDR process, and to ensure compliance with applicable laws and regulations.