

INVESTOR COMPLAINTS HANDLING POLICY

(External Policy)

1. Overview

The GPT Group is committed to responding to investor complaints in a fair, timely and efficient manner to maintain the trust and confidence of our investors.

This Policy has been written having regard to the complaints handling requirements of:

- The Australian Financial Services Licences (AFS Licence) of the following GPT Group companies (GPT Group AFS Licensee):
 - a) GPT RE Limited in its capacity as responsible entity for the General Property Trust (GPT); and
 - b) GPT Funds Management Limited in its capacity as responsible entity for the GPT Wholesale Shopping Centre Funds and the GPT Wholesale Office Funds (GPTFM); and
 - c) Any other Trust, Fund or Scheme established or managed by the GPT Group;
- The Constitutions of the Trusts, Funds or Schemes managed by the GPT Group;
- The *Corporations Act 2001* (Cth);
- The *Privacy Act 1988* (Cth);
- ASIC Regulatory Guide 271 *Internal Dispute Resolution* (issued July 2020) (ASIC RG 271); and
- The guidelines set out in Australian Standard AS/NZS 10002:2014 "Guidelines for complaint management in organizations".

This Policy is supplemented and supported by the Investor Complaints Handling Procedure which sets out guidelines and procedures that GPT employees are required to follow in dealing with investor complaints.

2. Purpose

The key objectives of this Policy are to:

- recognise, promote and protect the rights of investors;
- provide clear guidance for investors on how they can lodge a complaint with The GPT Group and how their complaint will be dealt with;
- provide clear guidelines and procedures for dealing with investor complaints; and
- provide investors with details for accessing external complaints management services where applicable.

3. Scope

This Policy applies to complaints made in respect of the provision of any financial service or product offered by a GPT Group AFS Licensee and/or made by or on behalf of an investor or securityholder in a registered or unregistered managed investment scheme offered by a GPT Group AFS Licensee where:

- the managed investment may be listed on the ASX or unlisted;
- the complaint relates to units or securities (including their price, return, value, resale, or performance) or the management of a managed investment scheme by a GPT Group AFS Licensee; or
- the complaint relates to an AFS Licence held by a GPT Group AFS Licensee.

This Policy also applies to complaints made by a debt investor in respect of a financing arrangement entered into with a GPT Group entity.

The GPT Group may also receive complaints from customers or tenants of its assets or in relation to our embedded network services. These are managed respectively under our customer complaints handling processes and [Embedded Network Complaints Handling & Dispute Resolution Policy](#).

This policy applies to:

- all employees of The GPT Group;
- Link Market Services Limited (Link) in its capacity as the Registry for GPT;
- Boardroom (Victoria) Pty Ltd (Boardroom) in its capacity as the Registry for GPTFM; and
- Any other entity appointed to undertake registry services for a Trust, Fund or Scheme managed by the GPT Group.

This policy applies to complaints received on or after 5 October 2021. Complaints received prior to this date will be dealt with under the GPT Investor Complaints Handling Policy version 5.0, dated September 2018.

4. What is a complaint?

AS/NZS 10002:2014 defines a complaint 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”.

Posts that meet this definition of “complaint” on a social media channel or account owned or controlled by The GPT Group, where the author is both identifiable and contactable, will be dealt with under this Policy.

Examples of the nature of complaints that may be received from investors include:

- Not being satisfied with the level of their investment’s performance;
- Related party protocols not being followed;
- Privacy and confidentiality breaches;
- Not receiving a distribution payment on time;
- Not having their change of contact details recorded correctly.

A complaint covered by this Policy can be distinguished from:

- Service requests (such as requests for approval, requests for action, routine inquiries, requests for the provision of services and assistance);
- Responses to requests for feedback about the standard or quality of services;
- Reports of problems or wrongdoing merely intended to bring a problem to our notice with no expectation of a response;
- Requests for information or explanation of GPT’s policies or procedures; or
- Negative feedback in a submission or survey, or dislike of a policy or procedure, which is brought to the attention of GPT in order to improve its operations.

5. Contact details for making a complaint

5.1 Principal Point of Contact

The GPT Group Head of Investor Relations and Corporate Affairs has been appointed the Complaints Handling Officer and is the main point of contact for complaints made in respect of the provision of any financial service or product offered by a GPT Group AFS Licensee or any financing arrangement with a debt investor.

Contact details for the Complaints Handling Officer are as follows:

Complaints Handling Officer
Phone: 02 8239 3555
Fax: 02 9225 9318
Email: complaints.officer@gpt.com.au
Postal address: The GPT Group, Attention: Complaints Handling Officer, Level 51, 25 Martin Place, Sydney NSW 2000

A complaint may also be submitted through the complaints page on the GPT website:

<https://gpt.com.au/complaints>.

5.2 Registry – GPT

Link has been appointed to provide registry services to GPT and to act as the main point of contact for investors to make enquiries or complaints (other than complaints relating to privacy) in respect of their investments.

Contact details for Link are as follows:

Phone: 1800 025 095
Fax: 02 9287 0303
Email: registrars@linkmarketservices.com.au
Postal address: GPT Security Registrar, Locked Bag A14, Sydney South NSW 1235
Street address: Level 12, 680 George Street, Sydney NSW 2000

5.3 Registry – Wholesale Funds

Boardroom has been appointed to provide registry services to GPTFM in respect of the Wholesale Funds and to act as a point of contact for investors to make enquiries or complaints (other than complaints relating to privacy) in respect of their investments.

Contact details for Boardroom are as follows:

Phone: 1300 737 760 (in Australia) or +61 2 9290 9600 (international)
Email: gpt@boardroomlimited.com.au
Postal Address: Boardroom Pty Limited, GPO Box 3993, Sydney NSW 2001
Street Address: Grosvenor Place, Level 12, 225 George Street, Sydney NSW 2000

5.4 Privacy

Complaints relating to privacy should always be directed to The GPT Group in the first instance.

Contact details for the Privacy Officer are as follows:

Phone: 02 8239 3555
Fax: 02 9225 9318
Email: company.secretary@gpt.com.au
Postal address: Privacy Officer c/- Company Secretary, The GPT Group, Level 51, 25 Martin Place, Sydney NSW 2000

See GPT's Privacy Policy through the "Privacy" link on the GPT corporate website (<http://www.gpt.com.au/privacy-policy>) for further information about how we handle privacy complaints.

5.5 Whistleblower

Complaints in relation to certain types of misconduct may be reported by eligible whistleblowers by making a whistleblower report. See details in "Whistleblower Complaints" on the complaints page on the GPT website: <https://gpt.com.au/complaints>.

6. Complaints Management Process



6.1 Receiving complaints

Complaints may be received through a number of avenues, including by telephone, facsimile, in person, by written letter, by email or on social media.

No matter the nature of an investor's complaint, we will adopt a positive attitude towards the investor and a commitment to resolving the complaint as soon as practicable. All dealings with investors will be in a courteous and friendly manner, with investors given an opportunity to have their concerns addressed fairly, efficiently and effectively.

We will record the following details for each complaint, including verbal complaints:

- The complainant's name and contact information;
- The nature and details of the complaint and the outcome the complainant wants; and
- Any other relevant information.

If a verbal complaint is received and the nature of the complaint is complex, we may request that the complainant submit the complaint in writing, to assist us to understand the nature of the complaint and the extent to which the complainant's rights have been adversely affected.

We will resolve the complaint immediately if possible, or will commit to a course of action to resolve the complaint in a timely manner.

Personal information will be recorded for the sole purpose of resolving the complaint in accordance with GPT's [Privacy Policy](#).

6.1.1 Accessibility

We will ensure that information about how and where complaints may be made to or about us is well publicised. We will ensure that our systems to manage complaints are easily understood and accessible to everyone, particularly people who may require assistance.

If a person prefers or needs another person or organisation to assist or represent them in the making and/or resolution of their complaint, we will communicate with them through their representative if this is their wish.

Anyone may represent a person wishing to make a complaint with their consent, eg. financial counsellor, family member or friend, legal representative, member of Parliament.

We will not charge people for making or pursuing a complaint.

6.1.2 Unreasonable conduct by people making complaints

We are committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time our success depends on:

- Our ability to do our work and perform our functions in the most effective and efficient way possible; and
- The health, safety and security of our staff.

When people behave unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work. As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same.

6.2 Acknowledging complaints

We will acknowledge receipt of a complaint promptly, verbally and/or in writing. We will acknowledge receipt within 24 hours (or one business day) of receiving it, or if this is not possible, as soon as practicable.

6.3 Assessing and investigating complaints

We are committed to assessing and investigating each complaint fairly, objectively and without actual or perceived bias.

The Complaints Handling Officer will generally direct the investigation. Where possible, staff the subject matter of the complaint will not be involved in the investigation.

Any complaint not likely to be resolved within 30 days of being received should be referred to the CEO and Company Secretary, with full details noted in the Complaints Register.

We will keep the complainant up to date on the progress of our investigation.

The Wholesale Funds' Constitutions contain some specific requirements in relation to complaints, as set out in section 6.5 below.

6.4 Responding to and resolving complaints

The remedies that may be available to a complainant will depend on the nature of their complaint and the rules of the relevant Trust, Fund or Scheme. By way of example, the remedies could include any one or combination of the following:

- Information and an explanation of the circumstances giving rise to the complaint;
- An apology;
- Correction of any error that may have occurred;
- Correcting incorrect or out-of-date records;
- Payment of compensation.

All complaints must be resolved and an internal dispute resolution response (IDR response) provided to a complainant within 30 days of being received. An IDR response will not be provided in this timeframe only if the complaint is particularly complex and an "IDR delay notification" has been provided in accordance with ASIC RG 271.

An IDR response is not required to be provided if a complaint is resolved to the complainant's complete satisfaction by the end of the fifth business day after the complaint was received and the complainant has not requested a response in writing.

The IDR response will inform the complainant of:

- The final outcome of their complaint, including the actions taken to fully resolve the complaint, or reasons for rejection or partial rejection of the complaint;
- Their right to take their complaint to the Australian Financial Complaints Authority (AFCA) or the Privacy Commissioner if they are not satisfied with the IDR response; and
- The contact details for AFCA or the Privacy Commissioner.

If the complaint is wholly or partially rejected by GPT, the IDR response will set out the reasons for the decision by:

- Identifying and addressing the issues raised in the complaint;
- Setting out GPT's findings on material questions of fact, and the information that supports those findings; and

- Providing the complainant with sufficient detail to understand the basis of the decision.

The Wholesale Funds' Constitutions contain some specific requirements in relation to complaints, as set out in section 6.5 below.

6.5 Complaints received in respect of the Wholesale Funds

The Wholesale Funds' Constitutions contain some specific requirements in relation to complaints. The requirements of ASIC RG 271 must be met to the extent that they are more onerous than the requirements in the Constitutions.

All complaints received in respect of GPTFM or the Wholesale Funds must be reported to the Head of Investor Relations and Corporate Affairs and recorded in the Complaints Register.

The GPTFM Company Secretary and Group Compliance Manager must be informed of any complaints reported in relation to the Wholesale Funds.

The Constitutions require that all complaints received in relation to GPTFM or the Wholesale Funds must be acknowledged in writing as soon as practicable and in any event within 14 days from receipt. However, in order to comply with ASIC requirements, the complaint must be acknowledged within 24 hours (or one business day) of receiving it, or if this is not possible, as soon as practicable.

The Constitutions require that as soon as practicable, and in any event not more than 90 days after receipt of the complaint, the complainant must be provided written communication detailing the outcome of their complaint. However, in order to comply with ASIC requirements, an IDR response must be provided to the complainant within 30 days after receipt.

If the complainant is dissatisfied with the outcome of their complaint they are to be:

- Advised that GPTFM is a member of AFCA and provided with the contact details; and
- Provided general guidance (without any obligation to provide legal advice) on further avenues available to the complainant.

If the complainant so requests, they are to be provided the opportunity to inspect any material held by GPTFM in relation to the alleged breach of the Corporations Act, the Constitution or breach of trust to which the complaint relates.

6.6 Further avenues of complaint

GPT and GPTFM are members of AFCA, which provides fair and independent financial services complaint resolution that is free to consumers. If a complainant is not satisfied with the IDR response, AFCA may be contacted. Contact details are as follows:

Online: www.afca.org.au
Email: info@afca.org.au
Phone: 1800 931 678

Postal address: Australian Financial Complaints Authority, GPO Box 3, MELBOURNE VIC 3001

If a complaint relating to privacy remains unresolved or the complainant wishes the Privacy Commissioner to further investigate the complaint, the Office of the Australian Information Commissioner may be contacted. Contact details are as follows:

Phone: 1300 363 992 (local call anywhere in Australia)
Email: enquiries@oaic.gov.au

Postal address: Office of the Australian Information Commissioner, GPO Box 5218, SYDNEY NSW 2001

6.7 Closing the complaint and record keeping

Records of all complaints will be maintained in a Complaints Register, including details about:

- The nature of the complaint;
- How we managed the complaint;
- The outcome of the complaint and how it was resolved, or the reasons for rejection or partial rejection of the complaint;
- Whether the complaint was referred to AFCA; and
- Any outstanding actions that need to be closed out.

The Complaints Handling Officer reviews the relevant Complaints Register regularly, including to analyse whether a complaint indicates a recurring or systemic issue, and if it does, what action was taken to ensure the issue does not recur/that the systemic issue has been addressed.

The Head of Investor Relations and Corporate Affairs reports on complaints through the Group Compliance Manager to the GPT Sustainability and Risk Committee and GPTFM Audit, Compliance and Risk Management Committee each quarter.

Ongoing review of significant or systemic complaints is used to identify and improve both processes and procedures (within the GPT Group or Link and/or Boardroom) and the content of communication to investors.

7. Further information

This Policy is subject to a formal review every 3 years (or as may otherwise be required) by the Complaints Handling Officer, relevant Fund Manager and Group Compliance Manager, with any material changes to be approved by the respective Boards. Management will review the Policy annually and propose recommended changes to the Boards if required.

Reviews will take account of any changes to the nature of the businesses of any GPT Group AFS Licensee, the Constitutions of the Trusts, Funds or Schemes managed by the GPT Group, any relevant regulatory requirements and process improvements identified through complaints processes.

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