


# Dispute Resolution & Complaint Handling Policy



November 2025

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### DISPUTE RESOLUTION & COMPLAINTS HANDLING POLICY

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Dated 28 November 2025

## Commitment

**GTC Global (Australia) Pty Ltd** ABN 84 611 436 796 AFSL No. 496 371 ("GTC AU") (the Business) is actively committed to the effective and efficient handling of complaints and resolution of disputes. This Dispute Resolution & Complaints Handling Procedure outlines the processes that should be followed if someone makes a complaint, including any privacy complaints about how their personal information is handled. Our goal is to manage any such complaint in a genuine, prompt, fair, and consistent manner.

## Purpose

- A.** The purpose of this document is to describe the Business's approach to the management of complaints and the framework within the Business that supports this, and to detail its internal dispute resolution framework.
- B.** In addition to promoting a culture of fair customer treatment, these procedures assist the Business in complying with its regulatory obligations:
  - (a) **ASIC Regulatory Guide RG 165** (on dispute resolution for complaints received before 5 October 2021);
  - (b) **ASIC Regulatory Guide RG 271** (on internal dispute resolution for complaints received after 5 October 2021);
  - (c) **AFCA** (Australian Financial Complaints Authority Limited) Terms of Reference;
  - (d) **ASIC Regulatory Guide RG 267** (on dispute resolution as an AFCA member);
  - (e) International Standards Organisation standard ISO10002 (on complaints handling); and
  - (f) The Corporations Act 2001 (Cth).
- C.** This document applies to all employees, agents, and representatives of the Business and to all our products. The document clearly sets out the procedures staff must follow on becoming aware of a complaint (see definition below).

## Operative provisions

### 1 Definitions

In this document:

Terms	Definition
AFCA	means Australian Financial Complaints Authority.
ASIC	means Australian Securities & Investment Commission.
Compliance Manager	means the person appointed by GTC AU who is responsible for managing and overseeing the internal dispute resolution (IDR) process in accordance with this Policy. The Compliance Officer is also responsible for escalations, reporting, and liaison with AFCA where required.
Employee	means any of the Business's employees, representatives, officers, or directors.
Director	means a director of GTC AU. References to the Director include any delegated authority given to support the Compliance Officer in the administration of this Policy.
Privacy Officer	means any individual nominated on the Business's AFSL as being responsible for managing and enforcing the Business's privacy policies and protocols. GTC AU's Compliance Manager is the Privacy Officer.
Representative	means a person who provides, or assists in providing, financial services on behalf of GTC AU under its AFSL, or who is recorded on ASIC's Register of Authorised Representatives in relation to GTC AU's AFSL (if applicable).
The Business means	GTC Global (Australia) Pty Ltd ABN 84 611 436 796 ("GTC AU") AFSL No. 496 371 and any related bodies corporate that might exist from time to time.

## **2 This Policy**

### **2.1 Effective Date**

This Policy is effective from the review date above and will be reviewed annually or as deemed necessary.

### **2.2 Supersedes**

This document supersedes all previous documents, practices, and policies relevant to Dispute Resolution and Complaints Handling.

### **2.3 When does this Policy Apply?**

This Policy applies to all representatives and employees of the Business at all times, and the requirements remain in force on an ongoing basis.

### **2.4 Persons Responsible**

The Compliance Manager has the primary responsibility for the performance of the duties under this Policy (including in the case of a privacy complaint). However, complaints are investigated and managed by the respective department managers and escalated as required under this Policy.

### **2.5 Policy Review**

- (a)** The Business will monitor and review the performance of its Internal Dispute Resolution (“IDR”) processes, which include monitoring of complaint metrics, ongoing quality assurance, and regular reviews.
- (b)** Regular compliance audits will be overseen by the Compliance Manager and will be undertaken at least annually. Senior management should conduct or arrange regular reviews of IDR processes, and following this, the Business will develop plans to action review recommendations.

### **2.6 Our Business Culture**

The Business is committed to providing exceptional customer service and fair standards of operation in accordance with all codes of conduct, fair trade laws, and industry practices. As part of our industry accreditations, we hold our standards high and, in the event of a customer complaint, will provide a thorough, timely, and effective result.

### 3 What is a complaint?

**3.1** The Business adopts the definition of 'complaint' set out in AS/NZS 10002:2014:

*"[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."*

**3.2** Under this definition, the following expressions of dissatisfaction are complaints:

- (a) posts on a social media channel or account owned or controlled by the financial firm that is the subject of the post, where the author is both identifiable and contactable; and
- (b) complaints about a matter that is the subject of an existing remediation program or about the remediation program itself.

**3.3** The Business will categorise an expression of dissatisfaction that does not meet the definition of 'complaint' as 'feedback', an 'inquiry', a 'comment' or similar i.e., not a complaint, merely because:

- (a) the complainant expresses their dissatisfaction verbally;
- (b) we subjectively consider that the matter does not have merit; or
- (c) in rare cases, a goodwill payment is made to the complainant to resolve the matter without any admission of error.

**3.4** A complaint may be made on behalf of an individual by their representative. ASIC considers that a representative is not only a person with legal authority to act on behalf of a complainant (e.g., a legal representative) but also includes a financial counsellor, family, friends, and members of parliament. If a complaint is made by a representative, the Compliance Manager will initially form an assessment of whether or not the representative should be the point of contact for the complaint going forward based on:

- (a) if they reasonably believe that the representative is acting in the complainant's best interests; or
- (b) if they consider that the representative is acting in a misleading or deceptive manner with the complainant and/or the Business.

## **4 How are complaints made?**

**4.1** Complaints do not need to be in writing to be accepted by the Business. Even when a client expresses dissatisfaction verbally, as stated above, the responsible officer should report the client's concerns or dissatisfaction to the Compliance Manager immediately. If an employee has doubts as to whether an expression of dissatisfaction, whether verbal or written, rises to the level of a complaint, they should err on the side of caution and report it to the Compliance Manager.

### **4.2 Privacy Complaints**

Specific Privacy complaints are directed to:

The Privacy Officer

PO Box 4827, Eight Mile Plains, QLD 4113

[support@gtcau.com.au](mailto:support@gtcau.com.au)

### **4.3 General Complaints**

General complaints about our products and services are directed to the Business point of contact:

The Compliance Manager

PO Box 4827, Eight Mile Plains, QLD 4113

[support@gtcau.com.au](mailto:support@gtcau.com.au)

### **4.4 Clients with Disabilities and Language Barriers**

If a client attempting to make a complaint does not speak or understand English or otherwise has trouble communicating because of age, infirmity or some other personal characteristic, the employee can contact the Compliance team for free interpretation services delivered by TIS National.

### **4.5 Social Media**

Complaints may also be made through social media sites or apps owned or controlled by the Business. This form of complaint is more difficult to detect than a complaint made through other channels. As a result, the Marketing Team will monitor the 'complaint' posts on the accounts owned or controlled by the Business on a weekly basis and refer any complaints to the Compliance Manager

### **4.6 Proactively Identifying Complaints**



When a client expresses dissatisfaction but has not lodged a formal complaint, the Compliance Manager will record this in the system. Complaints, disputes, and expressions of dissatisfaction must all be captured. When recording relevant details in the system, the Compliance Manager must explicitly differentiate between complaints and feedback/comments/inquiries by classifying the matter as a “complaint”, “dispute” or “dissatisfaction”.

When a client expresses dissatisfaction, the Business will proactively ask whether they:

- (a) would like the staff member to lodge a formal complaint on their behalf;
- (b) need the Business to take any specific action; or
- (c) would like to lodge a complaint themselves.

If the client would like to lodge a complaint themselves, the Business staff will provide guidance on how they can do so by reference to the publicly available policy.

## 5 Principles

- 5.1 The Business observes the guiding principles set out in AS ISO 10002-2006 when addressing complaints:

<b>Visibility</b>	We inform our clients, personnel, and other interested parties how and where to complain. The document is publicly available on our website ( <a href="http://www.gtcau.com.au">www.gtcau.com.au</a> ), provided when an individual becomes our client, when a complaint or dispute is made, or on request.
<b>Accessibility</b>	We provide flexible, easily accessible arrangements for making complaints (e.g., by letter, email, or telephone).
<b>Responsiveness</b>	We respond and address complaints promptly in accordance with their urgency and prioritise complaints when necessary. We provide clear response times for dealing with a complaint and make our clients aware of these response times. We will advise clients if we are unable to respond within these response times. We treat our clients courteously and keep them informed of the



	progress of their complaint through the complaints-handling process.
<b>Objectivity</b>	We aim to address each complaint in an equitable, objective, and unbiased manner. This means adequate opportunity for each party to make their case, and complaints are investigated by staff who are not involved in the subject matter of the complaint. In responding to complaints, we will aim to give reasons for reaching a decision on the complaint and adequately address the issues that were raised in the initial complaint.
<b>Charges</b>	We will provide clients, free of charge, material explaining our complaints handling procedure and access to our complaints handling procedure.
<b>Confidentiality</b>	We will not disclose personally identifiable information about clients unless it is needed for the purposes of addressing the complaint. This type of information will be actively protected from disclosure unless the client expressly consents. We have established a recording system for managing complaints, while protecting personal information and ensuring client confidentiality.
<b>Accountability</b>	We prepare reports about complaints, including the actions taken and decisions made, for our management team.
<b>Continual improvement</b>	We have an ongoing objective to continually improve our complaints handling process and the quality of our products and services. We conduct a review of our complaints handling process every two years to ensure that the complaints system is operating efficiently.

## 6 Receiving complaints

- 6.1** All complaints received by any Employee, including through the Privacy Officer or via any Business communication channel, must be immediately referred to the

Compliance Manager.

- 6.2** ASIC requires complaints to be acknowledged within 24 hours (one business day) or as soon as practicable. The Compliance Manager is responsible for issuing the acknowledgement.
- 6.3** If a complaint is posted on a social media channel owned or controlled by the Business, staff must notify the Compliance Manager immediately and must not respond directly. Only the Compliance Manager or another authorised officer may issue a response.
- 6.4** The information referred to the Compliance Manager should include:
  - (a)** the complainant's name, position, and contact details;
  - (b)** the complainant's relationship with the Business;
  - (c)** the complainant's contact person with the Business;
  - (d)** the clear description of the complaint.
- 6.5** Upon receiving the complaint, the Compliance Manager will:
  - (a)** verify the complainant's identity or authority, including confirming that the individual is the client or an authorised representative acting on their behalf;
  - (b)** log and record the complaint in the Complaints Register, including key dates, summary of issues, category of complaint, and any potential AFSL, privacy, or conduct risks;
  - (c)** assess and prioritise the complaint having regard to:
    - i.** the seriousness or potential client detriment;
    - ii.** whether the matter may involve a Reportable Situation under s912D;
    - iii.** whether the matter may involve a potential privacy breach; and
    - iv.** any requirement for urgent action (e.g. where the complaint involves time-sensitive error correction).
  - (d)** issue an acknowledgement to the complainant within 24 hours (or as soon as practicable), confirming receipt of the complaint and outlining the next steps.
  - (e)** within seven (7) days, provide an initial written update to the complainant including:

- i . a summary of our understanding of the issues raised;
- ii . confirmation that an investigation has commenced and who is responsible;
- iii . the Compliance Manager's name, position, and contact details;
- iv . any request for additional information or documents needed to progress the investigation;
- v . an outline of the proposed next steps and indicative timeframe for further updates or finalisation; and
- vi . confirmation that the complaint will be handled independently of any individual involved in the subject matter of the complaint

**6.6** Where a complainant requests a written response, the final IDR response must be provided in writing. Regardless of the format of communication, all details of the complaint, communications, actions taken, and outcomes must be fully recorded in GTC AU's systems. Records must be sufficiently detailed to support:

- (a) ASIC breach reporting assessments under s912D; and
- (b) design and distribution obligations (DDO) reviews, where relevant.

**6.7** Where a complaint involves potential privacy issues, the Compliance Manager will assess whether notification is required under:

- (a) the Privacy Act 1988 (Cth); or
- (b) the Notifiable Data Breach (NDB) scheme.

**6.8** The Business is required to have an effective system for recording information about complaints to enable it to keep track of the progress of each complaint it receives. The Business's complaints handling information will all be recorded in the Complaints Register, which is maintained by the Compliance Manager.

## **7 Investigating complaints**

**7.1** The Compliance Manager will deal with all complaints expeditiously, empathetically and attempt to reach a resolution which adequately addresses the complainant's concerns.

**7.2** In investigating a complaint, the Compliance Manager will consider:

- (a) whether the alleged conduct occurred;
  - (b) which issues are relevant, and whether the Business has complied with its obligations; and
  - (c) what outcome is appropriate in the circumstances.
- 7.3** The Compliance Manager may request further information from the complainant and other parties involved, though these requests should not ordinarily impact the timelines for response (see Schedule 1 - Table 2 for exceptions).
- 7.4** The Compliance Manager will keep the complainant informed of any progress.
- 7.5** Privacy complaints will be investigated in conjunction with the Privacy Officer.
- 7.6** The Compliance Manager will be careful not to jeopardise the complainant's privacy during the complaint handling process. Personal information to which the complaint relates will only be disclosed if it is necessary for the purposes of addressing the complaint unless the complainant gives their express consent for disclosure. If the Business discloses personal information and at the time of the disclosure, a decision about the complaint has not been made, the Business must, at that time, notify in writing the recipient of the information of the complaint.
- 7.7** The Compliance Manager has the discretion to escalate the complaint for consideration by the management team.

## **8 Referring complaints to external resolution mechanisms**

If the complainant is not satisfied with the outcome of the complaint, or if the Business is unable to resolve the complaint within the specified timeframe in **Schedule 1 - Table 1**, complainants have the right to follow up their complaint via external resolution mechanisms. The Business will provide the complainant, in writing, the name and contact details of the external resolution mechanism.

### **8.1 Privacy Commissioner under the Privacy Act 1988 (Cth)**

FOR AUSTRALIA:

Office of the Australian Information Commissioner

GPO Box 5218

Sydney NSW 2001

**Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

**Phone:** 1300 363 992

**Fax:** 02 9284 9666

**Website:** <http://www.oaic.gov.au>

**8.2** External Dispute Resolution (EDR) Scheme as holder of an Australian Financial Services Licence

FOR AUSTRALIA:

Australian Financial Complaints Authority

Reply Paid 252

GPO Box 3

Melbourne VIC 3001

**Phone:** 1800 931 678

**Website:** <http://www.afca.org.au>

**9 Recording and reviewing information about complaints**

**9.1** We will keep a record of all complaints received in the Complaints Register. Reports about complaints, including the actions taken and decisions made, are made available to the management team for accountability purposes. Complaint records may also be reviewed by the relevant regulatory body from time to time.

**9.2 The Complaints Register:**

(a) records our handling of the complaint, including:

- i. Complaint itself, including a copy of relevant text from any communications;
- ii. the date and time the complaint was made;
- iii. whether the complaint is an open or closed matter;
- iv. as much information as the Compliance Manager is able to collect; and
- v. how the matter was resolved, including the final written response

provided by the Business;

- (b)** specifies the steps for identifying, gathering, classifying, maintaining, storing, and disposing of records:

  - i.** Identifying: When a complainant contacts the Business regarding a complaint, we will identify the complainant using two forms of identification;
  - ii.** Gathering: Questions will be used to gather information about a complaint and complainant;
  - iii.** (Classifying: Complaints are classified according to:

    - (1) the type of complaint;
    - (2) subject of complaint;
    - (3) outcome of complaint; and
    - (4) timeliness of complaint;
  - iv.** Maintaining: Records are entered and maintained by the Compliance Manager. The Business will take utmost care to preserve items such as electronic files and magnetic recording media, since records in these media can be lost as a result of mishandling or obsolescence;
  - v.** Storing: The Complaints Register is stored electronically on internal servers. A backup of these servers is processed to an offsite location on a daily basis; and
  - vi.** Disposing: Records of complaints will be stored for a minimum of five years or any longer period required by applicable legislation. When required to dispose of information surrounding complaints, this information will be permanently deleted from the servers. Where paper records have been kept, this information will be disposed of by shredding the documents and placing them in the document destruction bin;
- (c)** keeps a record of the training and instruction that the individuals involved in the complaints handling process have received;
- (d)** specifies the Business criteria for responding to requests for record presentation and submissions made by a complainant, including time limits, types of information that can be provided, to whom the information can be provided, and what format the information can be provided in; and



- (e) specifies how and when statistical non-personally identifiable complaints data are disclosed to the public.

## 10 Identifying and recording systemic issues

- 10.1 All complaints are analysed to identify systematic, recurring, and single-incident problems and trends and to help eliminate the underlying causes of these complaints. The Complaints Officer will advise on steps that should be taken to enhance the Business's complaints handling process to avoid similar complaints arising in the future. Such steps may include reviewing existing policies and procedures and providing additional training to staff. A review of the complaints handling process will be scheduled at least annually, and any changes to this Complaints Handling Procedure will be documented to ensure that the complaints system is operating effectively.
- 10.2 The above is critical because ASIC has adopted a broad definition of a systemic issue (e.g., being a matter that affects, or has the potential to affect, more than one consumer) that is similar to the definition applied by the AFCA. ASIC expects prompt action to be taken to identify consumers affected by systemic issues, and fair remediation to be provided. Accordingly, the Compliance Manager will:
  - (a) encourage and enable staff to escalate possible systemic issues they identify from individual complaints;
  - (b) regularly analyse complaint data sets to identify systemic issues;
  - (c) promptly escalate possible systemic issues to appropriate areas within the firm for investigation and action; and
  - (d) report internally on the outcome of investigations, including actions taken, in a timely manner.
- 10.3 Boards are required to set clear accountabilities for complaints handling functions, including management of systemic issues identified through consumer complaints. The Compliance Manager will be responsible for preparing reports to the board and executive committees. The reports will include metrics and analysis of consumer complaints, including systemic issues that have been identified.
- 10.4 All complaints will be recorded in the GTC AU database system, and the recording information is set out in **Schedule 2**.



## 11 Other regimes / enforceability

**11.1** The Compliance Manager must prepare systemic issue reports, as there is a high likelihood that the issues contained in the reports will also comprise deemed breaches under section 912D of the Corporations Act 2001 (Cth) reportable to ASIC.

**11.2** The Compliance Manager must review complaints for the purpose of determining whether:

- (a) they breach an enforceable standard under the complaints handling framework (see Schedule 3);
- (b) they are reportable under ASIC's mandatory breach reporting regime; or
- (c) should be considered when reviewing the Business's Target Market Determinations under the design and distribution obligations (if applicable); and

ASIC has set out a number of IDR standards that are contained in **Schedule 3**. Some of these standards are enforceable, while others are ASIC's expectations. The key enforceable standards are set out in **Schedule 4**

### Schedule 1 – Complaint Timeframes

Table 1:

Complaint Type	Maximum timeframes for IDR Response
Standard complaints	An IDR response must be provided no later than 30 calendar days after receiving the complaint.

There is an exception to the maximum IDR timeframe requirements when the matters set out in Table 2 are satisfied. Before the relevant maximum IDR timeframe expires, unless the matter is resolved, the firm must give the complainant an 'IDR delay notification' that informs the complainant about:

- (a) the reasons for the delay;
- (b) their right to complain to AFCA if they are dissatisfied; and
- (c) the contact details for AFCA.

**Table 2:**

Requirement	Examples provided by ASIC
There is no reasonable opportunity to provide an IDR response within the applicable timeframe because the complaint is particularly complex.	A complaint about events that occurred more than six (6) years ago, requiring reconstruction of historical account information.
Circumstances outside GTC AU's control are causing unavoidable delays in the complaint-handling process.	The complainant is unable to respond due to illness, absence, or emergency.
Information essential to the resolution of the complaint must be obtained from third parties (not including an authorised representative who is a party to the complaint).	A third-party service provider, custodian, or external platform must supply documents or data before the complaint can be resolved.

## **Schedule 2 - Recording information about complaints and identifying and recording systemic issues**

All complaints must be recorded in GTC AU's complaints management system. Each record must contain sufficient detail to allow monitoring, investigation, reporting and identification of any systemic issues.:

Date of Complaint & Reference	Name of Complainant	Type of Complaint (e.g. fees not disclosed, poor communication, delay)	Date acknowledge ment sent	Result of investigation (e.g., our mistake; client mistaken; to EDR for resolution)	Complainant advised/Date  (Phone; Fax; Email; Letter)  NB: keep a copy of the notifications on file:
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The types of remedies available for resolving complaints or disputes

If a complaint is justified, the Compliance Manager will recommend a solution comprising one or more of the following:

- issuing an apology;
- providing compensation;
- varying contractual obligations; and/or
- offering a service at no cost.

Internal structures and reporting requirements.

The Compliance Manager reports directly to the Director. The Compliance Manager must make a written report monthly summarising:

- complaints received
- progress and outcomes
- emerging issues

The Compliance Manager must review these procedures at least annually and provide a written report to the Director with findings and recommendations.

## Schedule 3 – IDR Standards



#### Schedule 4 – Enforceable Standards

Category	Enforceable standard
Enabling complaints	The IDR process must be easy to understand and use, including for people with disability or language difficulties, and must be free for complainants.
Resourcing	GTC AU must ensure: <ul style="list-style-type: none"> <li>the IDR process is adequately resourced, so it operates fairly, effectively, and efficiently, with resourcing reviewed regularly;</li> <li>staffing levels are sufficient to manage complaints within maximum IDR timeframes, including during intermittent spikes in complaint volumes; and</li> <li>relevant staff have appropriate authority to resolve complaints, and decision-making delegations support fair and efficient complaint resolution.</li> </ul>
Responsiveness	GTC AU must comply with the maximum IDR timeframes and ensure that the complaint resolution outcome is implemented in a timely manner.
Policy & procedure	GTC AU must maintain a publicly available, readily accessible complaints policy and an internal complaint-management procedure.
Data collection	GTC AU must maintain an effective system for recording and tracking complaints. Complaints data must be regularly reported to senior management and the Board.