

Complaints Policy

Investa Listed Funds Management Limited

ACN 149 175 655
AFSL 401 414

What schemes does this policy apply to?

This policy applies to:

- Investa Office Fund, comprising:
 - Prime Credit Property Trust ARSN 089 849 196
 - Armstrong Jones Office Fund ARSN 090 242 229
(Schemes)

What is this policy about?

This policy has been written so it aligns itself with the complaints handling framework prescribed by the Constitutions of the funds managed by Investa Listed Funds Management Limited (the "Responsible Entity"), the Corporations Act 2001 and the guidelines set out in the Australian Standard AS ISO 10002:2006, MOD ("Customer satisfaction – Guidelines for complaints handling in organizations").

This policy will be reviewed regularly and at least once every 3 years to ensure that it is up-to-date and aligns with the practices and procedures adopted by the Responsible Entity and its external registry provider.

The key objective of this policy is that the Responsible Entity will endeavour to resolve most complaints equitably and within 5 business days, with more serious or complex complaints to be resolved within 10 business days. In the event that this target is not achieved, an explanation will be noted in the complaints register explaining why this target was not achieved.

What is a complaint?

AS ISO 10002:2006 defines a complaint as an *"expression of dissatisfaction made to an organization, related to its products, or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected"*. Some examples of complaints from a unitholder may include:

- not being satisfied with the performance of their investment;
- having withholding tax deducted from distribution payments after previously advising their Tax File Number to the Registry;
- not having their change of contact details recorded correctly; or
- not receiving their distribution on time.

Types of remedies available for resolving complaints

The types of complaints the Responsible Entity receives are highly varied and prescribing a set remedy is not appropriate. The Responsible Entity will review each complaint received and provide a tailored remedy. The Constitutions of the Schemes set out the types of remedies that may be available (see clause 18.4(d) of the Constitutions).

Procedures for making a complaint

Unitholders wishing to complain must direct their complaint in the first instance to the Investor Relations and Communications Manager of the Responsible Entity, who has been appointed as the principal point of contact for dealing with Investor Complaints and may be contactable as follows:

Investor Relations and Communications Manager

Investa Listed Funds Management Limited
Level 6, Deutsche Bank Place
126 Phillip Street
Sydney NSW 2000

Tel: 1300 130 231 (within Australia) or 02 8226 9497 (outside Australia)
Fax: (02) 9844 9300
Email: investorrelations@investa.com.au

The Responsible Entity's Compliance Manager has overall responsibility for the complaints handling procedure.

The Responsible Entity has also appointed Link Market Services Limited ("Registry") to provide registry services to the Schemes managed by the Responsible Entity and to act as the main point of contact for investors to make inquiries in respect of the Schemes managed by the Responsible Entity. Any complaints received via the Registry will be forwarded to the Investor Relations and Communications Manager for resolution.

All unitholders should provide full details of their complaint when writing to the Registry or to us, including their current contact details and HIN or SRN (if known).

Guidelines for dealing with complaints

The following guidelines have been put in place by the Responsible Entity for dealing with unitholder complaints:

1. The Responsible Entity will ensure that the receipt of the complaint is acknowledged immediately. Where immediately acknowledging receipt of a complaint is not possible, acknowledgment must be made as soon as practicable.
2. For complaints made to the Registry, the Registry may resolve the complaint directly with the unitholder on behalf of the Responsible Entity in accordance with the procedures set out in this policy. Such complaints would usually relate to:
 - transactions on the unitholder's account (such as applications, redemptions and distributions);
 - actions taken by the unitholder on their account (such as a transfer of their investment or a change of contact details); or
 - complaints about the service provided by the registry itself.

The registry will attempt to resolve all complaints as soon as possible.

3. The Responsible Entity will attempt to resolve the complaint equitably within 5 business days of the complaint being received. For more serious or complex complaints, the Responsible Entity will attempt to resolve the complaint within 10 business days.
4. In attempting to resolve the complaint, the Responsible Entity will:
 - address the complaint in an equitable, objective and unbiased manner;
 - treat the complaint as confidential, although disclosure to the Registry may be required to obtain certain information;
 - adopt a customer-focused approach, but will also consider the rights and interests of all other unitholders; and
 - be accountable to its senior management and the board for its actions and decisions when dealing with complaints.
5. The Responsible Entity must provide a final response in writing to a complaint within a maximum of 45 days.
6. In the event that the Responsible Entity cannot provide a final response to a complaint within 45 days, the Responsible Entity will, before the end of the 45 day period:
 - advise the unitholder of the status of the complaint, why the complaint has not yet been resolved and, in doing so, provide details of steps that need to be taken to resolve the complaint;
 - inform the unitholder of an expected timeframe for resolution, and keep the unitholder updated on developments relating to the complaint; and
 - inform the unitholder of their right to complain to the Financial Ombudsman Service (**FOS**) and provide FOS' contact details.
7. In providing a final response to unitholder's complaint, the Responsible Entity will:
 - make reference to the steps taken to resolve the complaint;
 - inform the unitholder of the final decision in relation to the complaint; and
 - inform the unitholder of the remedies available and of any further avenues of appeal that may be available if the unitholder is dissatisfied with the decision, including the right to take their complaint to FOS and include FOS' contact details.

All responses to complaints must therefore contain the following paragraph:

Investa Listed Funds Management Limited (the Responsible Entity for Investa's listed property funds) is required by law to be a member of an independent dispute resolution scheme. The Responsible Entity has chosen the Financial Ombudsman Service (FOS). If you feel your complaint remains unresolved or you wish FOS to further investigate your complaint, you can contact FOS in one of the following ways:

By phone: 1300 780 808
By fax: 03 9613 6399
In writing: Financial Ombudsman Service
GPO Box 3
Melbourne VIC 3001
By email: info@fos.org.au

8. The Compliance Manager of the Responsible Entity will maintain a register of all complaints received (either directly or referred from the Registry). This complaints register will contain details of:
- the date the complaint was received and ultimately resolved;
 - who the complaint was from;
 - the nature of the complaint;
 - all actions taken to resolve the complaint, including notification of any delay in resolving the complaint;
 - status of the complaint.

The Registry will report such information to the Responsible Entity as it requires to allow the Responsible Entity to maintain the register in respect of complaints received and resolved directly by the Registry.

9. The Compliance Manager of the Responsible Entity is responsible for:
- monitoring and reviewing the complaints register maintained by the registry provider;
 - maintaining the complaints register of all complaints received by the Responsible Entity (either directly or from the registry provider);
 - preparing reports regarding complaints to senior management and the board of the Responsible Entity;
 - recommending changes to the Responsible Entity's procedures or processes to address systemic, recurring and single incident issues raised by a complaint or a number of similar complaints; and
 - reviewing this Complaints Policy regularly and at least every 3 years to ensure that it is up-to-date and aligns with the practices and procedures adopted by the Responsible Entity and its external registry provider.

Questions?

Please contact:

Investor Relations and Communications Manager
Investa Listed Funds Management Limited
Level 30
420 George Street
Sydney NSW 2000

Phone: (02) 8226 9300

Fax: (02) 9844 9300

Email: companysecretary@investa.com.au

Policy Information

Responsibility: Legal & Company Secretariat

Date Last Reviewed: Approved by the ILFML Board on 8 December 2016