

GO Markets Securities Pty Ltd

Dispute Resolution Policy and Procedure

VERSION: 5 October 2021

GO Markets Securities Pty Ltd ABN 24 653 400 527 is a Corporate
Authorised Representative 1292963 of Sanlam Private Wealth Pty Ltd
ABN 18 136 960 775 AFSL 337927.

© 2021 GO MARKETS SECURITIES PTY LTD. ALL RIGHTS RESERVED



GO MARKETS

first choice for trading



Contents

1. Introduction	3
2. Definition of a Complaint.....	4
3. Complaint Management.....	4
4. Key Principles of Effective Complaint Management	4
5. Objectivity.....	5
6. Receiving Complaints.....	5
7. Verbal Complaint	5
8. Written Complaint	6
9. Customer Can Refer a Complaint to the Licensee and or AFCA	7
10. Staff Right	7
11. Specific Responsibilities.....	7
12. Compliance Manager.....	8
13. Record Keeping and Reporting	8
14. Review	8
SCHEDULE 1 Practical Guidance for Handling Verbal Complaints.....	8
SCHEDULE 2 Practical Guidance for Handling Written Complaints.....	9
SCHEDULE 3 Policy Review and Updates.....	10



1. Introduction

GO Markets Securities Pty Ltd (“GO Markets”) have developed and put in place this Dispute Resolution Policy and Procedure to expand complaints management obligations of its Australian financial services aligned with **Regulatory Guidance 271** issued by **Australian Securities and Investment Commission**.

Key changes include:

- Broadening the definition of complaints and complainants,
- Recognition of social media as a complaints channel,
- Reducing timeframes for complaint acknowledgement, resolution and external reporting,
- Enhanced complaint capturing and reporting requirements,
- Systemic issue identification, notification and timely remediation, and
- Priority treatment for vulnerable customers.

Importance of feedback

It is more important now than ever before for GO Markets to engage effectively and empathetically during the feedback process.

Demonstrating customer compassion in these moments has the potential to set a new course for the business where it can improve the financial wellness of the customer community.

Customer feedback provides valuable early warning of potential systemic issues with product design or distribution.

Capturing feedback data is crucial for GO Markets to proactively identify service issues.

Making a suggestion

If you have a suggestion about how we can improve our services, please write to support.shares@gomarkets.com

Paying a compliment

Should you have received exceptional service from one of our staff or found something that you particularly like on our web site, please write to hr.shares@gomarkets.com

This policy and procedure aim to:

- Provide an opportunity for customer communication and feedback;
- Recognise, promote and protect the customer’s rights, including the right to comment and provide feedback on GO Markets’ services;
- Provide an efficient, fair and accessible framework for resolving customer complaints and monitoring feedback to improve service delivery;
- Ensure flexibility in handling customers’ Complaints;
- Inform customers on the customer feedback handling processes; and
- Provide GO Markets Internal Parties with information about the processes and results to improve the services.



For the purposes of this Policy:

“Staff” means employees and Contractors of GO Markets; and

“Internal Party” means Directors, Management and Staff of GO Markets.

2. Definition of a Complaint

Complaint means 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.

Complaints may come from a customer or any person who has a legitimate interest in GO Markets services.

A Complaint can be received verbally, by phone, by email or in writing.

Customers may use other word than the word ‘Complaint’ to make a Complaint.

This Policy does not cover Complaints from Staff.

3. Complaint Management

All Complaints shall be primarily resolved by Head, Client Services under the guidance, support and in liaison with the Compliance department of GO Markets.

If GO Markets is not able to solve the Complaint, it may be referred to the Sanlam Private Wealth Pty Ltd (“Licensee”) or the Australian Financial Complaints Authority (“AFCA”).

4. Key Principles of Effective Complaint Management

This Policy is based on the following principles:

- Customers should be encouraged to voice their concerns at the point of service as soon as they feel unsatisfied.
- Information about how and where to complain should be well publicised to customers, personnel and other interested parties.
- Complaint management mechanisms should be easily accessible to all Complainants. The process should be easy to find, use and understand.
- GO Markets must immediately acknowledge customer Complaints and handle as quickly as possible according to the complexity of the issue.
- Wherever possible, Complaints should be resolved at the point from which they originated.
- Appropriate and trained staff must deal with customer Complaints fairly and sensitively.
- One management team member should be responsible for managing the Complaint from beginning to end, so the customer does not have to repeat their Complaint to different staff.



5. Objectivity

Each Complainant should be addressed by the Internal Parties in an equitable, objective and unbiased manner through the Internal Dispute Resolution (“IDR”) process. The principles of objectivity include:

- **Openness** - to ensure both personnel and Complainants understand the Complaints handling process.
- **Impartiality** - to ensure a balanced consideration of all information/evidence is undertaken before a Complaint can be resolved without fear or favour.
- **Confidentiality** - to ensure the Complainants’ and customers’ identities are protected. The Complaint, and any information provided or created in relation to the Complaint, are kept confidential to the parties except with the consent of the Complainant.
- **Accessibility** - to ensure all parties concerned are aware of the Complaints handling process and the lodged Complaints progress.
- **Completeness** - to ensure all available information/evidence have been collected from both sides.
- **Equity** - to ensure equal treatment to all people.
- **Sensitivity** - to ensure each case is considered on its merits, paying due care to individual differences and needs.

6. Receiving Complaints

Complaints may arrive through channels publicised for that purpose or through any other contact details or medium or opportunities the customer may have.

Complaints received by telephone or in person need to be recorded.

The Internal Party who receives a phone or in person Complaint should:

- a) Write down the facts of the Complaint;
- b) Take the Complainant's name, address and telephone number;
- c) Note down the relationship of the Complainant to GO Markets, for example: customer, prospective customer;
- d) Tell the Complainant that GO Markets has a Dispute Resolution policy and procedure;
- e) Tell the Complainant what will happen next and how long it will take;
- f) Where appropriate, ask the Complainant to send a written account by email so that the Complaint is recorded in the Complainant’s own words.

7. Verbal Complaint

Complaints can be lodged with GO Markets Client Services team by telephone on +61 3 8566 7680 or 1800 88 55 71.

If a customer makes a verbal Complaint to GO Markets’ Internal Party, the Internal Party should attempt to resolve it with the customer as soon as possible. However, if the Internal Party cannot resolve the Complaint directly, they must advise Head, Client Services as soon as possible, so that a means of resolution can be discussed, and put to the customer.

However, if the Internal Parties cannot resolve the customer’s Complaint verbally, they should inform the customer s/he can submit his/her Complaint in writing.



Should the customer wish to do so, they may only email the details of the complaint to attn. Head, Client Services on support.shares@gomarkets.com.

If it is a Complaint that involves a regulatory/legal issue or that involves suggestion on breach of any licensee obligations the Internal Party should inform the Compliance Manager as soon as possible on compliance.shares@gomarkets.com.

For further guidelines about handling verbal Complaints, see [Schedule 1](#).

8. Written Complaint

If a customer makes a Complaint in writing, the Internal Party must refer it to Head, Client Services on support.shares@gomarkets.com immediately.

If it is a Complaint that involves a regulatory/legal issue or that involves suggestion on breach of any licensee obligations the Internal Party should also inform the Compliance Manager on compliance.shares@gomarkets.com as soon as possible.

- 8.1 The procedures for handling the Complaint are:
- 8.2 The Head, Client Services to record it in the Complaints Register;
- 8.3 The Complaint, and any information provided or created in relation to the Complaint, is kept confidential to the parties except with the consent of the complaining customer;
- 8.4 The complaining customer will receive an acknowledgement by the next working day unless there are exceptional circumstances, that the Complaint has been received, the steps taken to resolve the Complaint are documented, the Complainant will be kept informed of the progress of the measures being taken for resolution of the Complaint.
- 8.5 The acknowledgement will include that GO Markets will write to the Complainant within the next 10 days after if it has not reached a decision, a final response will be sent to the Complainant within 30 days by the Compliance Manager and that if a Complaint is not resolved through these procedures the customer may take the Complaint, free of charge, to Sanlam Private Wealth Pty Ltd. ("**the Licensee**", AFCA member 14570 or to the external dispute resolution system run by the Australian Financial Complaints Authority ("**AFCA**").
- 8.6 GO Markets will handle the Complaint promptly, effectively and in an independent manner, obtaining additional information as necessary.
- 8.7 GO Markets will assess fairly, consistently and promptly:
 - The subject matter of the Complaint;
 - Whether the Complaint should be upheld;
 - What remedial action or redress may be appropriate;
 - Whether another party may be solely or jointly responsible for the matter alleged in the Complaint.
- 8.8 Guiding factors will include the following:
 - All the evidence available and the circumstances of the Complaint
 - Similarities with other Complaints received by GO Markets.
 - Relevant guidance published by the regulator, other relevant regulators and AFCA.



- Appropriate analysis of decisions by the AFCA concerning similar Complaints received by GO Markets or other the entities.

8.9 GO Markets will give written response (with reasons) to the complaining customer within 30 days:

- Of any decision it reaches on the Complaint under Internal Dispute Resolution; or
- If the customer is unable to resolve the Complaint with GO Markets, the complaining customer may take the Complaint, free of charge to AFCA.

For further guidelines about handling written Complaints, see [Schedule 2](#).

9. Customer Can Refer a Complaint to the Licensee and or AFCA

GO Markets' Licensee is a member of an external dispute resolution scheme (AFCA member 14570) operated by AFCA. Customer can refer the dispute to the licensee and or AFCA.

Please refer to the AFCA website set out below for more information.

Mail: Australian Financial Complaints Authority
GPO Box 3
Melbourne VIC 3001
Australia

Phone: 1800 931 678

Email: info@afca.org.au

Website: afca.org.au

AFCA provides fair and independent financial services complaint resolution that is free to all customers.

Customer can refer a complaint to AFCA when:

- The customer is unable to resolve the complaint with GO Markets;
- The complaint is unresolved after 30 days of making a Complaint to GO Markets;
- GO Markets advises the customer to take the Complaint to AFCA.

10. Staff Right

The Customer Complaints Policy is designed to identify opportunities for improving customer satisfaction with the delivery of GO Markets services and enhance the customer relationship. However, it is recognised that Complaints will sometimes name individual staff members. Staff have certain rights, including the right to appropriate feedback and communication on work performance, fair and consistent treatment and reasonable avenues of redress. These rights are always to be respected, particularly in Complaints where Staff are cited.

11. Specific Responsibilities

This section lists the responsibilities of specific GO Markets Internal Parties in implementing and maintaining this Policy.



All Staff must immediately report to GO Markets about all important comments, feedback or Complaints made by the customers that are related to the business of the company.

12. Compliance Manager

- The Compliance Manager is responsible for maintaining this policy.
- Reports to the Directors any Complaints that involve breach of any licensee obligations.

All Staff

- Are responsible for receiving customer feedback or complaints.
- Are to give priority to assist in the resolution of customer Complaints.
- Document all Complaints received and how they were resolved, including any changes that may be required to delivery of service.
- Provide the Head, Client Services with the Complaint documentation.
- Comply with the record keeping requirements under this Policy.

13. Record Keeping and Reporting

All information including information on receiving, resolving, analysing and reporting Complaints should be kept in the Complaints Register by the Client Services and Compliance departments.

Documentation regarding Complaints shall be retained in accordance with GO Markets' record keeping procedures and shall be kept for at least 7 years.

Complaints management should be referenced in the GO Markets annual report and the information will include:

- a) Number of Complaints received; and
- b) Where appropriate, also the amount of time taken to resolve the Complaints; and.
- c) Where appropriate, also the service improvements made because of the Complaints received.

Complaints Register will be kept separate from other records held by the GO Markets. Information that would identify Complainants and will not be released in individual or aggregated form to anyone not involved in the customer Complaint procedure without prior written permission from the Compliance Manager.

14. Review

The policy will be reviewed at least once every year or when necessary.

SCCHEDULE 1 Practical Guidance for Handling Verbal Complaints

- Remain calm and respectful throughout the Conversation.
- Listen - allow the person to talk about the Complaint in their own words.
- Sometimes a person just wants to "let off steam".
- Don't debate the facts in the first instance, especially if the person is angry.
- Show an interest in what is being said.



- Obtain details about the Complaint before any personal details.
- Ask for clarification wherever necessary.
- Show that you have understood the Complaint by referring to what you have noted down.
- Acknowledge to person the reception of the Complaint.
- Acknowledge the person's feelings (even if you feel that they are being unreasonable) - you can do this without making a Comment on the Complaint itself or making any admission of fault on behalf of GO Markets, e.g., "I understand that this situation is frustrating for you".
- If you feel that an apology is deserved for something that was the responsibility of GO Markets, then apologise.
- Ask the person what they would like done to resolve the issue.
- Be clear about what you can do, how long it will take and what it will involve.
- Don't promise things you can't deliver.
- Give clear and valid reasons why requests cannot be met.
- Make sure that the person understands what they have been told.
- Wherever appropriate, inform the person about the available avenues of review.

SCHEDULE 2 Practical Guidance for Handling Written Complaints

- Inform Head, Client Services immediately about the Complaint.
- If a Complaint that involves a regulatory/legal issue inform the Compliance Manager as soon as possible.
- Keep all communication in respect of the Complaint in a separate Complaint file.
- Head, Client Services will:
 - Acknowledge to the customer the reception of the Complaint within the next working day unless there are exceptional circumstances by the same mean of communication.
 - Inform the customer about steps - who is dealing with the Complaint, when the customer may expect a result, how the result will be communicated to the customer, who will respond on behalf of GO Markets.
 - If necessary, request clarification about the Complaint and personal details of the customer (address, email address, phone number).
 - Inform the customer that GO Markets will write to the customer before 10 days if it has not reached a decision and a final response will be sent to the Complainant within 30 days and if a Complaint is not resolved through these procedures, the customer may take the Complaint free of charge to AFCA.
- Refer the Complaint to the Compliance Manager for investigation after 10 days. Compliance Manager will:
 - refer the write to the customer within 30 days of the decision about the investigation results and the solution of the Complaint, where:
 - The customer shall be satisfied with the solution.
 - Always send an apology to the customer, where deserved.
 - Provide compensation to acknowledge the inconvenience, stress or time loss.



- Inform the customer in writing about their Licensee and AFCA revision rights and provide AFCA' below contact details:

“If you are not satisfied with our solution of the Complaint, you can contact the Licensee and AFCA to independently review your Complaint to the address:

Australian Financial Complaints Authority
GPO Box 3
Melbourne VIC 3001
Australia
Phone: 1800 931 678
Email: info@afca.org.au
Website: afca.org.au

- Reconfirm with the customer that the customer is satisfied with the Complaint solution.
- If customer is satisfied close the Complaint.
- Suggest improvement for dealing with customer Complaints if relevant to any Staff.

SCHEDULE 3 Policy Review and Updates

- Compliance Manager monitors continuously the Complaints and identifies trends in Complaints once they occur.
- Compliance Manager prepares monthly/quarterly report on the Complaints received.
- Board of Directors reviews the Complaints reports and trends at least on a quarterly basis.
- Compliance Manager initiates update of this policy and Complaints procedures when appropriate.
- Human Resources Manager initiates update of Staff training when appropriate.