

# *Public Complaints Management Policy*

*Pitcher Partners Investment Services Pty Ltd*



Pitcher Partners Investment Services Pty Ltd  
ACN 052 941 036 ABN 24 052 941 036 AFSL 229887

Level 13, 664 Collins Street  
Docklands VIC 3008

p. + 61 3 8610 5000

[pitcher.com.au](https://pitcher.com.au)

## Contents

1. Pitcher Partners Investment Services Pty Ltd .....	3
2. Purpose .....	3
3. How to lodge a complaint.....	3
4. Our complaints handling process.....	4
5. Independent External Review – Australian Financial Complaints Authority (AFCA) .....	5
6. Privacy concerns .....	5

### Disclaimer

This document has been prepared for the exclusive use and benefit of Pitcher Partners Investment Services Pty Ltd (AFSL 229887), our clients and our Authorised Subscribers. It must not be used or relied on by any other person, without our prior written consent. Information is sourced from third parties and Pitcher Partners believes it to be reliable at the date of publication, although we cannot guarantee accuracy and reliability, nor do we accept responsibility for errors and omissions. The information, including opinions, estimates and forecasts contained herein are as of the date of publication and are subject to change without notice. Pitcher Partners is under no obligation to correct any inaccuracy or update the information. Any financial product advice contained in this document is general advice only and does not take into account your objectives, financial situations or needs. If you wish to acquire a financial product, we recommend you seek advice from a Pitcher Partners Investment Services' representative, and where applicable, consider the relevant offer document prior to making any financial decision. Before acting on anything contained in this document, you should speak to your Pitcher Partners Investment Services' representative and consider the appropriateness of the information or general advice having regard to your objectives, financial situation, or needs. If you act on anything contained in this document without seeking personal advice you do so at your own risk. To the maximum extent permitted by law, neither we, nor any of our representatives, will be liable for any loss, damage, liability, or claim whatsoever suffered or incurred by you or any other person arising directly or indirectly out of the use or reliance on this information, or any changes made to this document without our prior written consent.

# 1. Pitcher Partners Investment Services Pty Ltd

Pitcher Partners Investment Services Pty Ltd (AFSL 229887) provides independent and personalised asset consulting, portfolio construction, investment advisory, financial planning and investment management and administration services to private clients, family groups, corporate and personal superannuation funds, not-for-profit and public sector organisations.

The Investment team has access to several highly qualified and experienced members of the Tax, Estate Planning and Superannuation practices of the firm who provide technical assistance as required for clients' financial planning needs.

## 2. Purpose

The purpose of this policy is to provide information on how consumers can lodge a complaint with Pitcher Partners Investment Services Pty Ltd (PPIS), the options available to assist consumers who might need additional assistance to lodge a complaint and PPIS steps for dealing with complaints including response timeframes.

## 3. How to lodge a complaint

Complaints can be lodged (either in writing, online, via email, phone call or in person) directly with the firm's Complaints Officer. The Complaints Officer is the Chief Risk and Compliance Officer, however, in certain circumstances the Chief Risk and Compliance Officer may appoint a delegate to manage or assist with a complaint.

**Geoff Gray**  
Chief Risk and  
Compliance Officer

*p.* +61 3 8610 5363  
*e.* [geoff.gray@pitcher.com.au](mailto:geoff.gray@pitcher.com.au)  
*m.* PO Box 1297, Melbourne VIC 3001  
*In person.* Level 13, 664 Collins Street,  
Docklands

**We request that you direct your complaint directly to the Complaints Officer via one of the above methods.** Complaints raised via other means, such as social media, may not be seen by the Complaints Officer or recognised as a complaint.

### What if I need assistance to lodge a complaint?

We recognise that not all people want to make a complaint and therefore it is important to us that you feel encouraged and supported to lodge a complaint.

A complaint may be lodged by yourself or by a representative on your behalf. Such representatives might include, but may not be limited to, financial counsellors, legal representatives, family and friends. Where a complaint is received via a representative, PPIS will not contact you directly unless you specifically request direct communication with us. **Exceptions** to this might include where we don't believe the representative is acting in your best interests, or they are acting in a deceptive or misleading manner, or we believe they are not authorised to represent you.

Alternatively, contact the Complaints Officer and request assistance. We will endeavour to assist you to make the process as easy as possible.

## 4. Our complaints handling process

### 4.1 Complaint is received

A complaint may be received by anyone within PPIS and therefore Advisers and staff have received training to assist them in recognising a complaint and immediately directing it to the Complaints Officer. Complaints may be received verbally or in writing.



#### Verbal complaint

When a verbal complaint is received, either by phone, video link or in person, the person receiving the complaint is expected to make a comprehensive record of the complaint, including who is making the complaint and their contact details, the background information that has led to the complaint and any desired resolution from the complainant – including timeframes.

This information is required to be passed through to the Complaints Officer for consideration and actioning.



#### Written complaint

Written complaints are also to be directed to the Complaints Officer immediately after receipt.

The Complaints Officer or the person who received the complaint (e.g. the adviser) may contact you if further clarification is required on any of the matters raised.

Complaints received are recorded by the Complaints Officer in a Complaints Register for record maintenance and further investigation purposes.

### 4.2 Acknowledgement of the complaint

PPIS will provide you with an **acknowledgement within 24 business hours of receiving the complaint**. The acknowledgement may be verbal or in writing and will inform you that a formal response will be provided within 10 business days.

### 4.3 Assessment and investigation of the complaint

The Complaints Officer, or a delegate, will attempt to collect and analyse all information and background material relevant to the complaint and may make further enquiries of the complainant or the PPIS adviser or staff to gain a better understanding of the complaint.



#### The Complaints Officer

**Will analyse the information** from the various sources and will generally form a view as to whether the complaint is reasonable and valid, and if so, what resolution may be appropriate.

May also consider **whether any breach** of the AFS License, Codes of Ethics or law has occurred and recommend appropriate action to address this. This may include a formal breach notification, identifying whether other parties may be affected and determining if broader remediation steps are required.

Where the complaint **relates to concerns about independence or actual or perceived conflicts of interest the complaint** the Complaints Officer may refer the matter to the firm's Risk Committee along with proposed action.

### 4.4 Formal response

PPIS will issue a **formal response to you within 10 business days of the complaint being made**, even if we are unable to resolve the issue in that period – in which case we will disclose to you the reason for the delay.

The formal response will include the outcome of the complaint assessment, and any proposed action and resolution where it is determined that the complaint is valid.



**Our response** will also provide options available to you if you are not satisfied with our response. This will generally include the offer of an independent internal review conducted by a designated partner of Pitcher Partners.

The details of the designated partner will be provided at the time of our response. We will also include the contact details for the Australian Financial Complaints Authority (AFCA) which also appear below.

PPIS has a maximum timeframe to provide you with a formal complaint response within 30 calendar days.

#### 4.5 Delayed complaint resolution

Some limited exceptions for resolution may apply in certain circumstances. Where a delay is likely to occur and we are unable to resolve the complaint within 30 calendar days, we will issue a delay notification to the complainant (either yourself or your representative). In our communication, we will include the reason for the delay. You have a right to complain to AFCA if you are dissatisfied with the delay.

#### 4.6 Maintaining and filing complaints

All records in relation to the complaint are retained by the Complaints Officer within the firm's document management system.

## 5. Independent External Review – Australian Financial Complaints Authority (AFCA)

PPIS is a member of AFCA. If you still do not get a **satisfactory outcome within 30 calendar days** of the first notification of your complaint to us, you have the right to lodge a complaint with AFCA.



**Australian Financial Complaints Authority (AFCA)**  
GPO Box 3, Melbourne, VIC 3001

e. [info@afca.org.au](mailto:info@afca.org.au)

w. <https://www.afca.org.au/about-afca>

**Consumers** 1800 931 678

**Infoline** 1300 300 630

This service is provided to you free of charge

We may refer a complaint to AFCA for resolution when a complaint remains unresolved and you have not escalated the matter to AFCA. In such instances, we will obtain your consent prior to escalating any unresolved complaints with AFCA.

The Australian Securities and Investments Commission (ASIC) also has a freecall Infoline 1300 300 630 which you may use to obtain information about your rights.

## 6. Privacy concerns

If your complaint relates to a breach of our Privacy Policy or the Australian Privacy Principles, the matter should be referred to **The Privacy Officer**, Pitcher Partners, GPO Box 5193, Melbourne VIC 3001.



# Making business *personal*

Pitcher Partners has the resources and depth of expertise of a major firm, but with a boutique firm feel. We give our clients the highest level of personal service and attention. That's the difference.

Pitcher Partners is an association of accounting and business advisory firms located in Adelaide, Brisbane, Melbourne, Newcastle, Perth and Sydney. We have a strong reputation for providing personal service and quality commercial advice to our clients across a broad range of industries.

We specialise in working with middle market businesses in Australia, including privately owned, foreign controlled, government owned and not-for-profits. Our clients require high technical standards, matched with a personal understanding and involvement in their affairs.

Each Pitcher Partners firm is also an independent member of Baker Tilly International, one of the world's leading networks of independently owned and managed accountancy and business advisory firms. Our strong relationship with other Baker Tilly International member firms has allowed us to open many doors across borders for our clients.

Pitcher Partners Investment Services Pty. Ltd. ABN 24 052 941 036 AFS LICENCE NO. 229887

Pitcher Partners is an association of independent firms. Liability limited by a scheme approved under Professional Standards Legislation. Pitcher Partners is a member of the global network of Baker Tilly International Limited, the members of which are separate and independent legal entities.



[pitcher.com.au](https://pitcher.com.au)

PublicCompliantsMgtPolicy 210802