



Insolve Capital Australia  
PTY LTD

## **INTERNAL DISPUTE RESOLUTION POLICY**

## TABLE OF CONTENTS

1	EXECUTIVE SUMMARY .....	1
2	PURPOSE .....	1
3	SCOPE .....	1
4	IDENTIFYING CONSUMER COMPLAINTS .....	1
4.1	What is a Consumer Complaint? .....	1
4.2	What is Not a Consumer Complaint? .....	2
5	RESOLVING COMPLAINTS .....	2
5.1	Escalation of Consumer Complaints .....	2
5.1.1	Complaint Categories .....	3
5.1.2	Complaint Escalation Protocol.....	3
5.2	Communication .....	3
5.3	Prompt Resolution .....	4
5.4	Investigation .....	4
5.5	Corrective Action .....	5
5.6	Recording.....	6
6	MONITORING .....	6
6.1	Methodology .....	6
6.2	Reporting and Corrective Action .....	7
7	VENDOR COMPLAINTS .....	7
8	TRAINING REQUIREMENTS .....	7
9	ASSESSMENT OF CONSUMER COMPLAINT MANAGEMENT PROCESS .....	7
10	POLICY ADHEREANCE .....	7
11	POLICY ADMINISTRATION .....	8

## 1 EXECUTIVE SUMMARY

Insolve Capital Australia Pty, Ltd. (“Insolve”) believes that complaints should be treated in a responsible and professional manner and used to correct adverse effects of business activity when appropriate. Accordingly, Insolve has established this Policy for Managing and Resolving Consumer Complaints (the “Policy”) that sets forth the standards and processes that govern the treatment of consumer complaints.

## 2 PURPOSE

Insolve has created this Policy to ensure that consumer complaints are appropriately addressed and resolved promptly. This Policy also establishes standards that allow consumer complaints to serve as an effective tool to proactively identify business activities and/or compliance controls that require enhancement or correction to mitigate the risk of consumer harm and enhance business practices.

## 3 SCOPE

This Policy shall apply to consumer complaints relating to any aspect of Insolve’s business. Insolve is the master servicer of its servicing portfolio and uses subservicer(s) to service accounts on its behalf (“Subservicer”). Accordingly, this Policy applies to consumer complaints received by a Subservicer and Insolve itself.

Given that Insolve is not expected to maintain any direct correspondence with consumers or undertake in any consumer-facing servicing activity, it is expected that consumer complaints impacting Insolve and the servicing activity performed by its Subservicer will be received by the Subservicer directly. However, if Insolve does receive a complaint directly from a consumer it shall address, resolve, and track the complaint in accordance with the standards set forth in this Policy.

## 4 IDENTIFYING CONSUMER COMPLAINTS

### 4.1 What is a Consumer Complaint?

A customer complaint is any oral or written expression of dissatisfaction made to or about Insolve or any activity undertaken on Insolves’ behalf, 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. A complaint can be received via facsimile, email communications, in person, or through postal mail. While it is anticipated that a majority of consumer complaints will be filed by consumers directly, complaints shall also include those that are forwarded to Insolve or a Subservicer by certain third parties on behalf of consumers.

Written or oral complaints filed by, or forwarded from, the following sources shall be considered consumer complaints:

- Consumer (*i.e.*, both customers and non-customers);
- Authorized designee of a consumer (*e.g.*, attorney, guardian, etc.);
- Trade groups, special interest groups, consumer protection groups (*e.g.*, ASIC);
- Law enforcement agencies; or
- Government agencies

## 4.2 What is Not a Consumer Complaint?

A consumer complaint generally does not include the following:

- Offhand negative remarks that do not assert a specific dissatisfaction with respect to any aspect of the servicing activity undertaken on Insolve’s behalf;
- Routine consumer inquiries (*e.g.*, status of payment history) or service requests;
- Customer requests for information with respect to an existing account transaction that are received in the normal course of business, including a notice of error;
- Explanation of a policy or practice;
- Request for a fee refund that is not made in conjunction with an expression of dissatisfaction or alleged violation of a consumer financial law; or
- Negotiation of the terms and conditions of an existing account or applicable loss mitigation remedy.

## 5 RESOLVING COMPLAINTS

Insolve requires that all consumer complaints be taken seriously and addressed in a responsible and professional manner with the best interests of the consumer in mind. To achieve this objective Insolve requires the following standards to be adhered to when resolving consumer complaints:

- Ensure that complaints are escalated to the appropriate functional group;
- Ensure that updates regarding the status of the complaint are provided throughout all aspects of the complaint management process;
- Ensure that all relevant allegations identified in complaints are subject to an appropriate investigation capable of determining the root cause of the activity or practice at issue;
- Ensure that consumer complaints are responded to promptly;
- Ensure that prompt corrective action is taken —when appropriate—to correct or mitigate harm incurred by the consumer as a result of (i) incident involving fraudulent or abusive conduct by Insolve or a Subservicer, (ii) violation of any enumerated federal consumer financial law or any other relevant federal or territory laws, regulations, guidance, agency guidelines (collectively “Legal Requirements”); and
- Ensure that all relevant aspects of consumer complaints and the actions undertaken by Insolve or a Subservicer to resolve them is recorded.

### 5.1 Escalation of Consumer Complaints

The level of potential regulatory, reputational, and monetary risk posed to Insolve by a consumer complaint shall determine how the complaint is managed and resolved.

### 5.1.1 Complaint Categories

#### Category 1 Complaints

Category 1 Complaints include any alleged adverse customer service incidents relating to any servicing practice, loss mitigation remedy, or any conduct of an employee of Insolve or Subservicer. Examples of Category 1 Complaints include allegations that a Subservicer has not provided a borrower with a timely response to her or his inquiry or that Insolve or Subservicer continues to request that a borrower provide information or documentation that has already been submitted.

#### Category 2 Complaints

Category 2 Complaints generally involve an alleged violation of Legal Requirements or when the consumer is experiencing domestic or financial abuse, the consumer has a serious or terminal illness, or when a delay in addressing could adversely affect the consumer's basic living conditions. Consumer Complaints filed by, or forwarded from, law enforcement agencies, government agencies, and regulators regardless of their nature should be considered Category 2 Complaints.

### 5.1.2 Complaint Escalation Protocol

Upon receiving or discovering a consumer complaint, employees of Insolve or Subservicer are required to immediately report the complaint and provide any relevant documentation or information to the appropriate functional group responsible for managing and resolving the complaint. All complaints, whether submitted to Insolve or a Subservicer, should be forwarded to the appropriate function group within Insolve. Specifically, Category 1 Complaints should be forwarded to Insolve's Customer Relations Group ("Customer Relations"). Category 2 Complaints should be immediately forwarded to Insolve's Compliance Department ("Compliance").

Employees of Insolve and a Subservicer that receive or discover a consumer complaint are expected to act in a professional manner, follow the escalation protocol at all times, and avoid confronting the consumer regarding the merits of any allegation made in the complaint. Further, employees of Insolve and a Subservicer that receive or discover a consumer complaint are prohibited from responding to inquiries or additional requests for documentation or information made by the attorney, law enforcement agency, or government agency that filed or forwarded the complaint. Any inquiry or additional requests for documentation or information made in connection with a consumer complaint should be escalated to Customer Relations or Compliance in accordance with the protocol described in the preceding paragraph.

## 5.2 Communication

Upon being notified of a consumer complaint, Customer Relations or Compliance (as appropriate) must contact the consumer, agency, attorney, or other applicable third party that filed or forwarded the complaint (collectively "Complainant") within one (1) business days or as soon as practicable. When determining the appropriate method of communication, consideration should be given to the method used by the complainant to lodge their complaint and any preferences they may have expressed about communication methods. During this initial communication personnel from Customer Relations or Compliance (as appropriate) shall:

- Acknowledge the receipt of the complaint; and

- Inform the consumer, agency, or applicable third party that (i) a written response to their complaint and (ii) any appropriate corrective action needed to cure any confirmed consumer harm shall be provided after an appropriate review of the allegations made in the complaint has been completed.

After this initial contact it is expected that Customer Relations or Compliance (as appropriate) shall keep Complainants informed of the status of their complaint, and when possible, set a reasonable expectation as to when a response and any appropriate corrective action shall be provided. However, if after reviewing the consumer complaint and any other relevant material it is determined that additional documentation or information is needed to complete their investigation as to the validity of the complainant's allegations, Customer Relations or Compliance (as appropriate) shall promptly provide the Complainant with a written notice that:

- Identifies the specific documentation or information needed to complete its investigation;
- Identifies the Complainant of the reasonable time period in which such must be provided; and
- Informs the Complainant that if the requested documentation or information is not provided within the timeframe specified Insolve shall treat the complaint as withdrawn.

### **5.3 Prompt Resolution**

Insolve generally requires Complaints to be resolved within twenty (21) business days. These time frames shall commence on the date the consumer complaint is received by Customer Relations or Compliance and shall end on the date Insolve or Subservicer (if requested by Insolve) provides written notice of (i) the disposition of all allegations raised in the complaint; (ii) findings on material questions of fact and supporting information thereof; (iii) if appropriate, any corrective action Insolve shall undertake to correct the harm incurred by the consumer; (iv) the consumer's right to take the complaint to AFCA if they are not satisfied with the IDR response; and (v) contact details for AFCA. When appropriate the designated time frame for resolving Category 2 Complaints will be adjusted to facilitate compliance with time limits of a specific Legal Requirement.

If for any reason the consumer complaint cannot be resolved within the applicable time frame due to complexity or circumstances beyond control Customer Relations, Compliance, and/or the Subservicer (as appropriate) shall document the reasons for the delay and update the Complainant regarding the status of the complaint including written notice of (i) the reason for the delay; (ii) consumer's right to complaint to AFCA if dissatisfied; and (iii) contact details for AFCA.

### **5.4 Investigation**

To determine the validity of any allegation contained within consumer complaints, Customer Relations or Compliance, in conjunction with relevant personnel from the applicable Subservicer, shall subject each allegation to a comprehensive investigation.

The investigation of Category 1 Complaints may include, among other things, the following:

- Interviewing the person(s) or reviewing the product, service, or practice that was the focus of the alleged customer service incident;

- Reviewing all correspondence with the applicable consumer—to the extent such correspondence can be accessed at a reasonable cost; and
- Reviewing all documentation and information provided by the Complainant.

In performing its investigation of Category 2 Complaints, Compliance, in conjunction with relevant personnel from the applicable Subservicer, and when appropriate: (i) Insolve’s Legal Department (“Legal”); and/or (ii) any third party compliance firm, consultant, or law firm engaged by Insolve, shall do the following, among other things:

- Interview the person(s) and/or review the product, service, or practice that was the focus of the alleged violation of Legal Requirements;
- Review all correspondence with the applicable consumer;
- Review all documentation and information provided by the Complainant;
- Review the account file and all documentation and data contained within the relevant account systems and databases in connection with the account that was the focus of the alleged violation of Legal Requirements;
- Investigate any interested party to an account transaction in connection with an allegation of fraudulent conduct; and
- Research the requirements and/or restrictions associated with the specific Legal Requirement alleged to have been violated.

In ensuring that an adequate investigation is completed, Insolve expects the relevant Subservicer to fully cooperate in the investigation, complete any reasonable investigative initiatives requested by Insolve, and provide Insolve with all information in its possession that pertains to the allegations made by the Complainant. Further, if requested, the Subservicer shall respond to a complaint in accordance with the standards set forth within this Policy.

## 5.5 Corrective Action

If after concluding its investigation, Customer Relations or Compliance, determines that corrective action is needed to offset any harm caused to a consumer as a result of a customer service incident or violation of Legal Requirements, the appropriate corrective action must be identified and approved before any written response is provided to the Complainant concerning its disposition of the complaint. The appropriate corrective action that shall be offered in connection with Category 1 Complaints shall be determined by Insolve’s Customer Relations team. However, if the corrective action identified involves a monetary remedy or deviation to the existing servicing guidelines/standards the consent of Insolve’s Compliance Officer must be obtained before either may be offered to the Complainant.

For Category 2 Complaints, the appropriate corrective action shall be determined by Insolve’s Compliance Officer. However, corrective action identified to cure the effects of any: (i) discrimination; (ii) unfair, deceptive, or abusive act or practice; (iii) improper loss mitigation practices; or (iv) alleged fraud, including unauthorized account transactions, must be approved by Legal before being offered to the Complainant.

## 5.6 Recording

Customer Relations, Compliance, or Subservicer (as appropriate) shall record relevant information regarding consumer complaints within a Consumer Complaint Log. This complaint log shall be updated throughout all phases of the complaint management process, and include, among other things, the following information:

- The name of the consumer;
- Name of party that filed or forwarded complaint;
- Date complaint received or discovered;
- Name of person or functional group that received or discovered complaint;
- Date complaint escalated to Customer Relations or Compliance (as appropriate);
- Complaint category ("1" or "2");
- Personnel assigned to resolve complaint;
- The Complainant's allegations;
- Dates and summary of key correspondence with Complainant
- Findings from the investigation conducted by Customer Relations or Compliance (as appropriate);
- Date written response provided to Complainant;
- Corrective action (as appropriate)
- The root cause of the of the activity or practice at issue

Further, key consumer complaint-related documentation, including, but not limited to, (i) the written complaint filed by, or forwarded from, the Complainant, (ii) documents used to assess the validity of the Complainant's allegations, and (iii) the written response to a Complainant shall be uploaded into a secure Consumer Complaint Sharefile on an ongoing basis by Customer Relations, Compliance, or Subservicer (as appropriate).

## 6 MONITORING

On an ongoing basis, consumer complaints—whether relating to a Subservicer or Insolve—shall be reviewed to drive adjustments to Insolve's business and/or a Subservicer's servicing practices and control framework. The findings from these reviews will be shared with the Compliance Officer, and when appropriate, Executive Management. These findings will also be shared with appropriate management personnel of a Subservicer when necessary.

### 6.1 Methodology

These reviews will be performed by Compliance on an annual basis and consist of a trend-tracking analysis designed to proactively identify (i) systemic compliance deficiencies at Insolve or Subservicer level, (ii) commonalities in problematic customer service incidents, and/or (iii) servicing practices or programs that are most often alleged by Complainant's as the cause of consumer harm. To complete its trend-tracking analysis, Compliance shall use the data contained in the Consumer Complaint Log and, when necessary, the documentation maintained within the Consumer Complaint Sharefile. The findings resulting from Compliance's periodic trend-tracking analysis will be documented in reports developed by Compliance.



## **6.2 Reporting and Corrective Action**

The reports containing the findings from the periodic trend-tracking analysis of consumer complaints performed by Compliance shall be presented to the Compliance Officer on an ongoing basis. Any findings of confirmed consumer harm resulting from: (i) discrimination; (ii) an unfair, deceptive, or abusive act or practice; (iii) a violation of a Legal Requirement; or (iv) alleged fraud shall also be presented to Executive Management promptly after Compliance Officer has reviewed such findings. The Compliance Officer and /or Executive Management shall review the findings resulting from the ongoing trend-tacking analysis of consumer complaints to determine what adjustments or enhancements are needed to Insolve’s business activity and/or the servicing practices of the appropriate Subservicer. Thereafter, Compliance Officer shall work with all relevant functional groups at Insolve and/or Subservicer to ensure that any approved adjustment or enhancement is tracked through completion.

## **7 VENDOR COMPLAINTS**

Consumer complaints received by Vendors other than Subservicers that relate to any action or inaction by the Vendor with respect to a service or deliverable requested by Insolve shall be resolved in accordance with the Vendor’s internal consumer complaint management process and/or any standards set forth within the contractual agreement or statement of work (or equivalent document) between the parties.

Insolve requires Vendors to escalate consumer complaints involving any alleged (i) discrimination; (ii) unfair, deceptive, or abusive act or practice; (iii) violation of a Legal Requirement; or (iv) alleged fraud by the Vendor in connection with any services or deliverable requested by Insolve. Vendors shall be required to submit their proposed written response to such complaints, along with any planned corrective action to cure the harm incurred by a consumer, to Legal for its review and approval. When necessary, Legal will also review any supporting documentation and/or information used by the Vendor to assess the validity of any allegation made by the Complainant. Upon receiving the written approval of Legal, the Vendor will promptly deliver its written response to the Complainant and initiate the appropriate correction action (when appropriate).

## **8 TRAINING REQUIREMENTS**

To facilitate compliance with this Policy Insolve will provide ongoing training to appropriate staff and Subservicers on the standards, processes, and restrictions set forth within this Policy.

## **9 ASSESSMENT OF CONSUMER COMPLAINT MANAGEMENT PROCESS**

Executive Management shall ensure that Insolve’s proper execution of the consumer complaint standards and processes set forth within this Policy are subject to an annual review by Insolve’s audit group, and when appropriate, any third party compliance firm, consultant, and/or law firm engaged by Executive Management (collectively “Audit”). This review shall be conducted independently, without any involvement from the functional groups assigned specific fulfillment functions within this Policy.

## **10 POLICY ADHEREANCE**

Staff, Subservicers, and Vendors are expected to adhere to this Policy. Failure to comply with this Policy may result in a range of disciplinary actions, up to and including termination.

## **11 POLICY ADMINISTRATION**

This Policy shall be reviewed at least annually under the direction of the Compliance Officer to determine whether any enhancements are necessary.