

PUBLIC COMPLAINTS POLICY

04 September 2025

Overview

This Complaints Policy explains how you can make a complaint, how Prime Years will manage and respond to your complaint, the timeframes we must meet, and the steps you can take if you are not satisfied with the outcome. Its purpose is to ensure that all complaints are handled fairly, promptly, and in accordance with enforceable Internal Dispute Resolution (IDR) requirements.

Prime Years is committed to client-focused, effective, and efficient complaint handling. We aim to address all complaints genuinely, consistently, and without bias, and to use them as an opportunity to improve our services.

The purpose of this Complaints Policy is to outline the information that must be contained in a complaints policy under the *ASIC Corporations, Credit and Superannuation (Internal Dispute Resolution) Instrument 2020/98* (“the Instrument”). The Instrument is a legislative instrument made by the Australian Securities and Investments Commission (ASIC).

In addition, the Prime Years Complaints Policy incorporates enforceable IDR requirements and best practices from the Association of Superannuation Funds of Australia’s (ASFA) summary of ASIC’s RG 271 (Regulatory Guide 271), as outlined in the *ASFA Enforceable IDR requirements* guidance.

We adopted the current version of this Complaints Policy on 4 September 2025.

What is a “complaint”?

A complaint is “any expression of dissatisfaction made to or about us, relating to our products, services, staff, or the handling of a previous complaint, where a response or resolution is expected or legally required.”

How to make a complaint

You can lodge a complaint with Prime Years in any of the following ways:

Telephone	1300 568 932
Email	hub@pyfp.com.au
Post	430 Little Collins St, Melbourne VIC, 3000

Social Media	Facebook: https://www.facebook.com/primeyearsau/ Instagram: https://www.instagram.com/primeyearsau/
In Person	430 Little Collins St, Melbourne VIC, 3000

When making a complaint, please provide:

- Your name and contact details
- How you would like us to contact you (for example, by phone, email, or post)
- A clear description of your concerns
- The outcome you are seeking

If you need help to make a complaint

If you require assistance in lodging a complaint, you may nominate a representative (for example, a family member, trusted associate, or professional adviser) to act on your behalf. Subject to your written authority, we will communicate directly with your nominated representative.

How we will deal with your complaint

Acknowledgement

We will acknowledge receipt of your complaint promptly and in accordance with your preferred method of communication:

- Verbal complaints: acknowledged immediately where practicable and confirmed in writing within one business day, or as soon as reasonably practicable.
- Written complaints: acknowledged in writing within one business day of receipt, or as soon as reasonably practicable thereafter.

We will also have regard to any communication preferences you have advised.

Investigation

Where your complaint cannot be resolved immediately, it will be subject to a thorough and impartial investigation. This process may include a review of relevant records, consultation with staff members involved, and a request for additional information from you where necessary. Our objective is to ensure that every complaint is considered fairly, consistently, and without bias.

Internal Dispute Resolution (IDR) Response

Where your complaint is not finalised within 5 business days, or you have requested a written reply, we will issue you with a formal Internal Dispute Resolution (IDR) Response. This written

response will be provided within 30 calendar days of our receipt of your complaint, except where extended timeframes apply to superannuation trustee matters or death benefit distribution objections.

Our IDR Response will:

- Explain the outcome of our assessment of your complaint and the reasons supporting our decision, expressed in plain and clear language.
- Summarise the key facts and evidence considered in reaching our decision, with reference to relevant supporting information.
- Provide sufficient detail to ensure you understand how the decision was reached and to enable you to decide whether to pursue the matter further.
- Advise you of your right to refer the complaint to the Australian Financial Complaints Authority (AFCA). AFCA offers a free, impartial, and independent dispute resolution service available to individuals and small businesses.

Where we reject your complaint, either wholly or in part, the IDR Response will:

- Directly address the issues you have raised;
- Clearly identify our findings on the material questions of fact, supported by reference to the information relied upon; and
- Offer adequate explanation to enable you to determine whether escalation to AFCA or another forum is appropriate.

We are not obliged to provide a written IDR Response if:

- The complaint has been resolved to your complete satisfaction within 5 business days and you have not specifically requested a written response; or
- Within 5 business days of receiving your complaint, we have provided you with an explanation and/or apology in circumstances where no further reasonable action can be taken.

Timeframes for IDR Responses

We are required to provide you with an IDR Response within the following maximum timeframes:

- 30 calendar days for most complaints, and
- 45 calendar days for complaints concerning superannuation trustee decisions or objections to death benefit distributions (following the mandatory 28-day objection period).

Delay in Providing an IDR Response

If, due to the complexity of the issues raised or circumstances beyond our control, we are unable to provide you with an IDR Response within the required timeframe, we will notify you in writing before the expiry of the timeframe. This notification will:

- explain the reasons for the delay,
- specify the expected timeframe for providing our response, and
- advise you of your right to escalate your complaint to AFCA, including AFCA's contact details.

Escalating your complaint

If you are not satisfied with our response, or if your complaint has not been resolved within the required timeframe, you may escalate your complaint to the Australian Financial Complaints Authority (AFCA).

You can contact AFCA using the following details:

- Phone: 1800 931 678 (+61 1800 931 678 if calling from overseas)
- Email: info@afca.org.au
- Online: www.afca.org.au
- Mail: GPO Box 3, Melbourne VIC 3001

AFCA provides a free, independent, and impartial dispute resolution service for consumers and small businesses.