



Vanguard[®]

Complaints Handling Policy

External

Vanguard Investments Australia Ltd

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1. Background

1.1 Overview and Purpose of the Policy

“Our core purpose is to take a stand for all investors, to treat them fairly, and to give them the best chance for investment success”.

Vanguard Investments Australia Ltd is driven by its core philosophy of always putting the interests of investors first and “doing the right thing”. We are committed to delivering exceptional client service and care to you, including the resolution of Complaints in a fair, equitable and timely manner. We take all Complaints seriously. We handle your concerns confidentially, respectfully and with professionalism.

This Complaints Handling Policy (Policy) sets out our approach to resolving Complaints in line with our investor focus, culture and values.

This Policy has been developed having regard to legislative and regulatory obligations and guidelines, and industry best practice.

1.2 Availability of Policy

The Policy is available on our website and in hard copy upon request.

Information about our Internal Dispute Resolution (IDR) process is also available in a range of Vanguard Australia disclosure documents including the Vanguard Financial Services Guide, Product Disclosure Statements, Personal Investor Guide and Periodic Statements (including exit statements).

You can also find out more information about our IDR process by contacting our Client Services team on 1300 655 101.

2. Making a Complaint

We are here to help. If you have a Complaint, we want to try and resolve it with you in a fair, respectful, and transparent manner.

2.1 Definition of a Complaint

A “Complaint” is:

an expression of dissatisfaction made to or about Vanguard Investments Australia, 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.

2.2 What is not a Complaint

We cannot deal with the following issues under this Policy:

- Employee/employment related complaints or grievances or work-related problems raised by staff
- Simple requests for information
- Comments made about us where a response is not required such as feedback provided in a survey
- Complaints commenced by litigation
- Whistle-blower incidents

2.3 Who can make a Complaint?

You can lodge a Complaint if you are a consumer (retail clients) or small business.

2.4 How can a Complaint be made?

If you have a Complaint, you should contact our Client Services team and tell us about your Complaint so that we can work together towards a resolution.

Online: www.vanguard.com.au

Email: clientservices@vanguard.com.au

Phone: 1300 655 101

Secure message: via Vanguard Online Secure Message Portal

Mail: Vanguard Investments Australia

GPO Box 1837

Melbourne VIC 3001

You can also lodge a Complaint related to our Exchange Traded Funds (ETFs) through Computershare, the share registry for our ETF products.

2.5 Do you need assistance to lodge a Complaint?

We are committed to helping you resolve your Complaint as quickly as possible and are flexible in how we receive, consider and deal with Complaints. We are happy to accept Complaints made by representative(s) on behalf of you where you have authorised the representative(s) to act on your behalf.

If you require any assistance to lodge a Complaint or during the resolution process, please contact our Client Services team on 1300 655 101.

There are also a range of accessibility options on our website. This Policy is available in large print and in other languages. Our website is designed to be accessible.

2.6 What information do you need to provide with your Complaint?

When you lodge your Complaint, please provide us with:

- your full name and contact details
- your Vanguard Australia investor or account number (if available)
- details of your Complaint, and where possible, provide a timeline of events
- copies of any supporting documents in relation to your Complaint
- your suggestions for how you would like us to resolve your Complaint
- your preferred method of communication

Providing us with as much supporting information as you can, will help us resolve your Complaint as quickly as possible.

3. Internal Dispute Resolution (IDR)

3.1 Acknowledgment of Complaint

When you lodge your Complaint, we will endeavour to acknowledge it within one business day, or as soon as practicable.

Acknowledgment may be verbally or in writing. We understand your time is valuable, so we are keen to act promptly and respond as soon as possible.

3.2 Investigation and Assessment

Our Client Services team will try to resolve your Complaint at the initial point of contact with you. However, we know that this is not always possible. Where it is not possible, our complaints team will undertake a comprehensive investigation. We will keep you informed of the progress.

3.3 Providing you with the outcome (IDR response)

We will provide you with a written “IDR response” setting out the final outcome of your Complaint and advise you of your right to take the Complaint to AFCA if you are not satisfied with the outcome, along with the contact details of AFCA.

If any part of your Complaint is rejected, we will give you the reasons for our decision.

We may not provide you with a written IDR response if your Complaint is resolved within 5 business days.

There are a broad range of possible remedies that may be available to address your Complaint.

3.4 Timing of our IDR response

We aim to resolve your Complaint as quickly as possible and will usually provide you with your “IDR response” within 30 calendar days after receiving your Complaint.

3.5 If there is a delay - IDR delay notice

Some Complaints are very complex. In limited circumstances, we may not be able to send your IDR response within the 30-day timeframe above.

This may occur if:

- resolution of the Complaint is particularly complex; and/or
- circumstances beyond our control are causing Complaint management delays.

If there is going to be a delay, we will give you an “IDR delay notification” that informs you about the reasons for the delay, your right to make a Complaint to AFCA if you are dissatisfied and the contact details of AFCA. We will keep you up to date and remain in contact with you until we have an outcome for you.

4. External Dispute Resolution

If you are not satisfied with the outcome of your Complaint, or if you have not received a response within the above timeframes, you may take your Complaint to the Australian Financial Complaints Authority (AFCA).

AFCA is an independent external body, whose role is to assist consumers and small businesses to reach agreements with financial firms about how to resolve their Complaints. If a Complaint does not resolve between the parties, AFCA will decide an appropriate outcome. AFCA provides a free service. You can make a Complaint to AFCA online, by letter, email or by phone.

It is important to note that time limits apply to some types of Complaints lodged with the AFCA.

AFCA’s contact details are:

Website: www.afca.org.au

Email: info@afca.org.au

Phone: 1800 931 678 (free call)

Mail: Australian Financial Complaints Authority

GPO Box 3 Melbourne

VIC 3001

If you lodge your Complaint directly with AFCA before you have raised it with us, AFCA will generally refer your Complaint to us to consider within timeframes specified by AFCA.