

## **Complaints Handling Policy**

### **First American Title Insurance Company of Australia Pty Ltd First Mortgage Services Australia Pty Ltd**

This document sets out the policy for handling complaints made against the First American Title Insurance Company of Australia Pty Ltd (“FATICA”), First Mortgage Services Australia Pty Ltd (“FMS”) and their affiliated companies in Australia (“the Group”).

The Group aims to promote the highest standard of service for our insureds, lender clients and ordering parties and to see that any complaints are dealt with genuinely, promptly, fairly, and consistently.

#### **1. Complaints**

A **Complaint** is an expression of dissatisfaction made to or about FATICA, FMS or the Group, 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 may be made to FATICA, FMS or the Group through a variety of channels including verbally, email, letter, through our websites or any other form of communication.

#### **2. Key elements of our complaints handling policy**

- **Commitment**

We acknowledge consumers’ rights to complain about our products, services, staff or the handling of a complaint. We welcome and value complaints as an important source of feedback and learnings.

We will treat complainants with respect and we will seek to resolve complaints through action whenever possible.

Our complaint process is free of charge to complainants.

- **Objectivity and fairness**

Complainants will be afforded fairness throughout the complaint process and all complaints will be treated with courtesy and investigated without prejudice. The complainant has the right to:

- Be heard - everyone has a right to complain.
- Know that the complaint is being reviewed independently where possible.

- Have their complaint considered on its merits.
  - Understand the process, including the avenues for further review, applied by the organisation when dealing with complaints.
  - Be informed of the organisation's decision and the reasons for that decision.
  - Have an opportunity to seek all relevant material used in the assessment of the complaint
- **Visibility and access**

This Policy is available on the FATICA website. A copy will be provided on request to any customer of the Group.

FATICA's complaints handling process is described in the Important Information pack made available to purchasers of FATICA's products.

- **Assistance**

We will offer assistance to complainants in the formulation and lodgement of complaints.

Where a complainant has special needs (for example, limited English skills) our staff will proactively evaluate the need for assistance (for example, an interpreter or use of cross-culturally trained staff or third parties).

Complaints may be made through any communication channel including by letter, email, through our websites (<https://www.firsttitle.com.au/contact>), or by telephone (1300 362 178 for FATICA or 1300 360 757 for FMS).

We will allow a representative authorised by you to lodge and deal with a complaint on your behalf. We will communicate with your representative unless you tell us not to, it is inappropriate that we deal with the representative, or you withdraw your authorisation for them to represent you.

- **Responsiveness**

Complaints will be dealt with promptly. We will not require complainants to go through unnecessary processes in order to lodge a complaint with us.

### **3. Our complaints handling process**

1. On receipt of a complaint, we will acknowledge it promptly so you know that we have received your concerns and will assess your complaint.
2. Where possible, we will seek to resolve your complaint within 5 business days of receiving it. Where appropriate, we will have someone not involved in the

matters the subject of your complaint undertake the assessment of your concerns. We will contact you to explain the outcome of our investigation and explain our response to your concerns.

3. If we cannot resolve the complaint within 5 business days, or if it is appropriate that respond more formally, or if you seek a written response, then we will provide a final Internal Dispute Resolution (“IDR”) response. An IDR assessment of your complaint is an investigation of your complaint by an independent person in the Legal, Risk and Compliance team and preparation of a formal written response to your complaint.
4. A final IDR response will be provided no later than 30 calendar days after receipt of your complaint unless the complaint is particularly complex or our investigation is delayed by circumstances outside our control. We will contact you to explain this if the final IDR response will be provided more than 30 calendar days after receipt of your complaint.
5. You may contact us at any point during our investigation to provide more information, documents or submissions. We will consider all information, documents or submissions that you provide to us when assessing your complaint.

#### **4. External Dispute Resolution Scheme**

The Group is a member of the Australian Financial Complaints Authority (“AFCA”). AFCA provides a free and independent mechanism for investigating and resolving complaints. Time limits may apply to lodging complaints with AFCA and guidance or information should be sought from AFCA.

AFCA may be contacted on any of the following channels:

**Online:** [www.afca.org.au](http://www.afca.org.au)

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

**Phone:** 1800 931 678

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