



# **National Storage Financial Services Limited**

## **Client Complaints Handling Procedure**

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## 1. Introduction

- (a) National Storage Financial Services Limited (ACN 600 787 246) as responsible entity for the National Storage Property Trust (ARSN 101 227 712) (AFSL No. 475228) (**National Storage**) recognises the importance of both retail and wholesale investors (**Client**) satisfaction to the success of its business. A well-structured Complaints Handling Procedure can enhance Client satisfaction. National Storage recognises that an effective Complaints Handling Procedure is an essential part of its compliance framework. National Storage is committed to handling all complaints in a fair, efficient, and effective manner. It is committed to resolving all complaints in a positive, timely manner.
- (b) To adhere to its compliance framework and ensure that all Client concerns and complaints are appropriately monitored, analysed, and resolved, National Storage has developed this Complaints Handling Procedure.

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## 2. Key Principles for Complaints Handling

National Storage strives to ensure that due care and utmost diligence is applied in the design of its products and the provision of services to its Clients. We recognise that complaints do arise. Moreover, complaints provide both improvement opportunities and insights into Clients' expectations.

The principles that National Storage will abide by when handling a complaint are as follows:

- (a) National Storage is committed to the efficient and fair resolution of complaints (in this context 'fairness' means fairness to both the complainant and the person complained about).
- (b) National Storage is committed to ensuring its complaints handling process is adequately resourced.
- (c) National Storage appoints a designated Complaints Handling Manager who will have responsibility for logging complaints in the Complaints Register and for managing and resolving complaints.
- (d) Clients are informed of our Complaints Handling Procedure which is made available to them.
- (e) National Storage employees are required to follow this Procedure and will take reasonable steps to ensure employees comply with this Procedure.
- (f) National Storage aims to deal with complaints quickly and courteously.
- (g) The Complaints Handling Manager, in consultation with the National Storage CEO, has the capacity to determine and implement remedies to complaints/disputes. However, where the resolution of a

complaint/dispute has financial implications, the Complaints Handling Manager will consult and seek approval from the National Storage CEO and CFO.

- (h) Complaints data is collected and recorded in a Complaints Register which sets out all the required information to be collected in relation to a complaint.
- (i) Complaints are reviewed by the Group Head of Legal and Governance on a quarterly basis and reported to the Board so that systemic or recurring problems are identified and rectified.
- (j) Any queries about this Procedure should be directed to the Group Head of Legal and Governance.

This Procedure is to be read in conjunction with the National Storage Privacy Policy which also refers to complaints handling procedures regarding privacy matters and data breach incident reporting.

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### 3. Definitions

|           |  |
|-----------|--|
| AFCA      | Australian Financial Complaints Authority  |
| CEO       | Chief Executive Officer  |
| CFO       | Chief Financial Officer  |
| Complaint | <p>National Storage defines a complaint as:</p> <p style="text-align: center;"><i>"any expression of dissatisfaction made to National Storage, related to its services, or the complaints handling process itself, where a response of resolution is explicitly or implicitly expected. Complaints may be oral or in writing."</i></p> <p>A complaint differs to an "enquiry" which tends to be a request for information about a product or service provided by National Storage. An enquiry is a factual request and does not reflect dissatisfaction.</p> <p>Where there is any doubt whether a communication received either verbally or in writing constitutes a complaint, the matter must be reported to the Compliance Officer, who will make further investigations and determine whether it is a complaint or otherwise.</p> <p>Regardless of the nature of the Client's complaint, there should be a positive and respectful attitude and a commitment to having the complaint resolved as soon as practicable.</p> |

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## **4. National Storage's commitment**

- (a) National Storage is committed to handling all complaints in a fair, efficient, and effective manner. The Complaints Handling Procedure has the support of all personnel including senior management.
- (b) National Storage is required to acknowledge receipt of a complaint with 24 hours of it being received. For this reason, all complaints whether written or verbal must be communicated to the Complaints Handling Manager immediately, or as soon as practicable, on receipt of a complaint.
- (c) National Storage aims to resolve complaints within 21 days. If National Storage is unable to resolve the complaint to the Client's satisfaction, National Storage will communicate the following items to the complainant as soon as practicable, no later than 30 days after National Storage received the complaint:
  - (i) the determination in relation to the complaint (either confirmation of actions taken by National Storage to fully resolve the complaint or reasons for rejection or partial rejection of the complaint);
  - (ii) the investor or customer's right to take the complaint to the AFCA; and
  - (iii) contact details for AFCA.

NB: The 30-day timeframe to provide a final response does not recommence where new information is provided in respect of the complaint.

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## **5. Resources and skills**

### **5.1 Complaints Handling Manager**

National Storage will ensure that a suitable officer of the company is appointed as the Complaints Handling Manager. The Complaints Handling Manager is currently Claire Fidler, who is also the Compliance Officer, an Executive Director and Company Secretary.

### **5.2 Employee training and selection**

The Legal and Governance Department shall, having regard to the requirements of this Procedure, select the necessary staff to administer this Procedure and assist the Complaints Handling Manager.

The employees, where selected, shall undergo such training as is necessary to discharge the specific duties assigned to them relating to complaints handling.

## 6. Client access to the Complaints Handling Procedure

- (a) National Storage will ensure that information about how and where to complain is publicised to Clients, personnel, and other interested parties. National Storage will communicate the following information:
  - (i) Where complaints can be made;
  - (ii) How complaints can be made;
  - (iii) Information to be provided by the complainant;
  - (iv) Process for handling complaints;
  - (v) Time periods for handling complaints;
  - (vi) Remedies; and
  - (vii) Feedback on status of complaint.
- (b) This information will be available via the company website.
- (c) National Storage will ensure that the Complaints Handling Procedure is also easily accessible to all complainants on the company website.

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## 7. The Complaints Handling Procedure

### 7.1 Receipt of complaint

When a complaint is received National Storage will record it. This record will identify information necessary for the effective handling of the complaint. All Complaints must be immediately referred to the Complaints Handling Manager for recording, analysis, and monitoring.

### 7.2 Tracking of complaint

National Storage will ensure the complaint is tracked from the initial receipt through the entire process until the complainant is satisfied. National Storage will provide an up-to-date status report to the complainant upon request, and at regular intervals where a complaint cannot be resolved quickly.

Ultimately, the Complaints Handling Manager is responsible for tracking the complaint.

### 7.3 Dealing with a Complaint

All complaints whether written or verbal must be communicated to the Complaints Handling Manager immediately, or as soon as practicable, on receipt of a complaint.

If a National Storage employee or representative receives a complaint from a customer or investor:

- (a) they must record all relevant details and immediately escalate the complaint to the Complaints Handling Manager;
- (b) the Complaints Handling Officer must record details of the complaint in the Complaints Register;

- (c) the Complaints Handling Officer must acknowledge receipt of the complaint either via a return phone call, email, or letter;
- (d) the Complaints Handling Officer must ensure the complaint receives proper consideration; and
- (e) the Complaints Handling Officer must use reasonable endeavours to deal with and resolve the complaint.

Responsibility for acknowledging complaints in the first instance rests with the Complaints Handling Officer. All complaints (whether verbally or in writing) will be acknowledged within 24 hours of receipt of the complaint in accordance with the requirements of Australian Securities and Investments Commission Regulatory Guide 271.

Subject to the nature of the complaint, National Storage will try to resolve the complaint to the Client's satisfaction as soon as possible. While most matters can be resolved quickly, more complex issues may take longer.

National Storage aims to resolve complaints within 21 days. If National Storage is unable to resolve the complaint to the Client's satisfaction, National Storage will communicate the following items to the complainant as soon as practicable, no later than 30 days after National Storage received the complaint:

- (i) the determination in relation to the complaint (either confirmation of actions taken by National Storage to fully resolve the complaint or reasons for rejection or partial rejection of the complaint);
- (ii) the Client's right to take the complaint to AFCA; and
- (iii) contact details for AFCA.

NB: The 30-day timeframe to provide a final response does not recommence where new information is provided in respect of the complaint.

All complaints must be recorded in the Complaints Register, which will capture, as a minimum the following information:

- (i) Date when the complaint was received
- (ii) Complainant's name
- (iii) Recipient of the complaint
- (iv) Fund Name/product to which the complaint relates
- (v) Nature of the complaint
- (vi) Summary of the complaint, including method of receipt
- (vii) Summary of the final response
- (viii) Outcome, including dates
- (ix) Date complaint closed

Refer to section 8 for what happens if we are unable to resolve the complaint.

## 7.4 Acknowledgement of complaint

National Storage is required to acknowledge receipt of a complaint to a Client within 24 hours of being received:

- (a) If the complaint is a written receipt, the Client will be provided with an acknowledgement of receipt slip.
- (b) If the complaint is received by e-mail, the Client will receive an acknowledgement reply e-mail.
- (c) If the complaint is made by phone, the Client will receive confirmation by the operator that the complaint has been entered into the complaints handling system.
- (d) If the complaint is made personally at the Head Office, the complaint will be acknowledged in person and confirmed in writing by an acknowledgement of receipt slip or email to the address provided by the Client.

## **7.5 Initial assessment of complaint**

The complaint will be initially assessed against criteria as determined by the Complaints Handling Manager from time to time having regard to the complaint and action categories.

The following are the initial complaint categories, i.e., where it is possible that:

- (a) Poor service: - a Client complains that poor service was provided to them or the service provided did not meet their expectations;
- (b) General concerns – concerns of a broader or general nature. These following are the initial action categories:
  - (i) Immediate: the complaint is immediately assessed and investigated, and resolved within a maximum of 5 business days;
  - (ii) Urgent: assessment and investigation of the complaint is given urgent priority, and resolved within a maximum of 30 days; and
  - (iii) Follow up: the complaint is dealt with in the ordinary course and resolved within a maximum of 30 days.

## **7.6 Investigation of complaint**

National Storage will make every reasonable effort to investigate all the relevant circumstances and information surrounding a complaint. The Complaints Handling Manager will adopt an objective, equitable and unbiased manner when investigating the complaint. The level of investigation undertaken will be dependent on the seriousness, frequency or occurrence and severity of the complaint.

Where a more substantial inquiry into a complaint is required, the following procedure will be followed:

- (a) Contact the complainant to clarify the complaint, the outcome sought and to explain the investigation procedure;
- (b) Brief yourself on the relevant background to the complaint;

- (c) Assess whether the Complaints Handling Procedure is the most appropriate way of handling this complaint. If not, discuss alternatives with the complainant;
- (d) Consider whether the complaint can be resolved without further investigation;
- (e) Obtain all relevant documents. Get copies of those that you need;
- (f) Establish the relevant sequence of events from the files and the names of officers/members most directly involved in the complaint;
- (g) Prepare a line of questioning for each person to be interviewed:
  - (i) Use open not leading questions;
  - (ii) Do not express opinions in words or by your body language;
  - (iii) Ask single not multiple questions;
- (h) Arrange the order of interviews that will facilitate the collection of as much information and facts so that the issue can be clearly understood and investigated. This may include other staff not directly involved in the complaint and end with the employees most directly involved with the complaint.

### **7.7 Communicating the decision**

National Storage will communicate the decision or any action to be taken regarding the complaint, which is relevant to the complainant or personnel involved, as soon as the decision is made, or the action taken.

### **7.8 Closing the complaint**

If the complainant accepts the proposed decision or action, then National Storage will carry out the decision or action and record it.

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## **8. External Dispute Resolution**

If you have a complaint about the service provided by National Storage, you should contact National Storage's Complaints Handling Officer:

- Via our website: [www.nationalstorageinvest.com.au/investor-feedback/](http://www.nationalstorageinvest.com.au/investor-feedback/)
- By email: [invest@nationalstorage.com.au](mailto:invest@nationalstorage.com.au)
- By phone: (07) 3218 8100
- Or by writing:

Complaints Handling Manager  
 National Storage Financial Services Limited  
 GPO Box 3239  
 Brisbane QLD 4000.

If an issue has not been resolved to your satisfaction, you can lodge a complaint with the AFCA of which we are a member. AFCA provides fair and independent financial services complaint resolution that is free to consumers.

AFCA has authority to hear certain complaints. Contact AFCA to confirm if they can assist you.

Time limits may apply to complain to AFCA and so you should act promptly or otherwise consult the AFCA website to find out if or when the time limit relevant to your circumstances expires.

You can contact AFCA:

- By phone: 1800 931 678 (free call)
- By email: [info@afca.org.au](mailto:info@afca.org.au)
- By writing: Australian Financial Complaints Authority,  
GPO Box 3, Melbourne VIC 3001
- By visiting: [www.afca.org.au](http://www.afca.org.au)

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## 9. Recording and analysing complaints

### 9.1 Recording complaints and responses

- (a) If the complaint is resolved to the complainant's complete satisfaction by the end of the 5th business day after the complaint was received, National Storage will formally record the dispute as being resolved including a summary of the action and outcome implemented.
- (b) The recording of complaints and disputes is a useful tool to review weaknesses, converting them into opportunities to determine appropriate remedial action to be taken to enhance Client satisfaction and retain Clients.
- (c) All complaints will be classified (as set out above) and analysed to identify recurring problems, and to help eliminate the underlying causes of complaints.
- (d) Management will meet on a periodic basis to review any trends identified to facilitate 9.1(b) above. Specifically, the Complaints Handling Manager will regularly undertake trend analysis on the:
  - (i) type of complainants;
  - (ii) subject of complaints;
  - (iii) outcome of complaints; and
  - (iv) timeliness of responses,and will then report to the Board on a regular basis (at least quarterly) on these trends.

### 9.2 Storage of Information

It is vitally important that the recorded complaint and all correspondence, both to and from a complainant, is securely stored for future reference. The process for storing correspondence is outlined below:

- (a) Electronic materials will be stored and managed on the National Storage database.

- (b) Manual or physical documentation generated through the procedure will be stored in dedicated complaints folders segmented for each complaint and in the sole custody of the Complaints Handling Manager.
- (c) Seven (7) years after a complaint is filed, National Storage will securely destroy the physical documentation relating to the complaint.

### **9.3 Disclosure of Information**

Personally identifiable information concerning the complaint will not be disclosed to third parties unless the complainant gives their consent or if National Storage is required to disclose it by any law, order of any Government agency or the rules of any stock or securities exchange.

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## **10. Maintenance and Improvement of procedures**

### **10.1 Monitoring**

National Storage will monitor the Complaints Handling Procedure regularly. The Complaints Handling Manager will receive monthly reports on complaints and will consider the Complaints Handling Procedure's effectiveness and any improvements that have been suggested or that issue from the reports. This will be in addition to the bi-annual review noted below.

### **10.2 Review**

The Complaints Handling Procedure will be formally reviewed by the Complaints Handling Manager, at least annually and any necessary changes implemented.

## **11. Procedure Owner, Review and Version Control**

This Procedure should be reviewed annually, or at a minimum every 2 years by the Compliance Officer who must also ensure the Procedure requirements are well communicated to staff.

Any material amendments proposed to this Procedure will need to be approved by the National Storage Financial Services Limited Board.

Non-material amendments (i.e., changes in role titles, formatting, etc.) made be made by the Compliance Officer who has authority to make those non- material amendments.

**Adopted by the NSFSL Board on 24 July 2019**

**Reviewed by the NSFSL Board on 22 June 2022**