

GARDA

COMPLAINTS POLICY

GARDA PROPERTY GROUP

GARDA Holdings Limited (ACN 636 329 774) (**Company**) and GARDA Capital Limited (ACN 095 039 366) (**Responsible Entity**) as responsible entity for the GARDA Diversified Property Fund (ARSN 104 391 273) (**Fund**) and their respective controlled entities (together **GARDA**).

Adopted by the board of directors of the Company and by the board of directors of the Responsible Entity as responsible entity for the Fund (**Board**)

TABLE OF CONTENTS

1. BACKGROUND.....	1
2. INTRODUCTION.....	1
2.1 Commitment to resolving complaints	1
2.2 Purpose of this policy	1
2.3 Application of this policy	1
3. HOW A COMPLAINT IS DEALT WITH BY GARDA.....	1
3.1 What is a complaint?	1
3.2 How you can make a complaint	2
3.3 Options for assistance	2
3.4 Steps for dealing with a complaint.....	3
4. YOUR RIGHT TO GO TO AFCA	3
5. REVIEW AND PUBLICATION OF THIS POLICY	3

1. BACKGROUND

GARDA Property Group is a stapled group comprising the Company and the Fund (and their respective controlled entities). The Responsible Entity is a wholly-owned subsidiary of the Company and responsible entity for the Fund.

Shares in the Company and units in the Fund are stapled together to form a single class of stapled securities (**Securities**). The Securities are listed on the Australian Securities Exchange (**ASX**).

This policy applies to those companies within the GARDA Property Group who hold:

- a) an Australian financial services licence, which enables it to act as the responsible entity of one or more funds; and
- b) an Australian credit licence, which enables it to provide credit services to retail customers.

2. INTRODUCTION

2.1 Commitment to resolving complaints

GARDA is committed to recording, investigating and resolving complaints received from customers and securityholders by:

- a) complying with the internal and external dispute resolution obligations imposed by law;
- b) ensuring that complaints can be made in a way which suits the complainant;
- c) ensuring that complaints are dealt with fairly, effectively and efficiently;
- d) communicating the result of the internal dispute resolution process within 30 days;
- e) identifying and participating in the statutory external dispute resolution process; and
- f) seeking to identify areas for improvement.

2.2 Purpose of this policy

This Policy is to inform customers and securityholders about:

- their right to make a complaint about the licensed activities of GARDA;
- how GARDA will deal with a complaint; and
- where they may go if the complaint is either not resolved, or not resolved to their satisfaction.

2.3 Application of this policy

This Policy applies to all GARDA directors, officers and employees.

3. HOW A COMPLAINT IS DEALT WITH BY GARDA

3.1 What is a complaint?

A complaint is an expression of dissatisfaction made to or about GARDA, 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.

Other objections which do not fall in this definition will not be treated as complaints. For example dissatisfaction with financial performance of GARDA securities, market performance outside the control of GARDA, or missing payments are not complaints, unless a systemic problem is discovered.

A complaint can be made under this policy by a 'retail client'. A retail client is broadly a customer or securityholder, or one acting through a representative.

GARDA will use a similar process for other complaints but is not bound to the process or timeframes outlined in this Policy.

3.2 How you can make a complaint

You can make a complaint verbally or in writing. It does not cost you anything to make a complaint.

You can:

- call GARDA on 07 3002 5300, or 1300 889 100
- email complaints@gardaproperty.com.au; or
- write to us:

Dispute Resolution Officer
GARDA Property Group
GPO Box 5270
Brisbane QLD 4001

You should mark it 'complaint' and include all details and documents you believe to be relevant. You should also include what you would like done about it, for example, should GARDA:

- provide an apology;
- take steps to remedy an error; or
- provide compensation.

The more information you can provide us at the outset, the more effectively we will be able to deal with your complaint.

3.3 Options for assistance

GARDA understands it is stressful to make a complaint and that certain people may need additional assistance to make a complaint. GARDA will provide reasonable assistance by:

- a) taking complaints or giving responses over the telephone; and
- b) arranging for translation if required.

If you need assistance, please let us know.

3.4 Steps for dealing with a complaint

GARDA aims to provide a response from our internal dispute resolution process (**IDR Response**) within 30 days of receipt of a complaint. The key steps and timeframes are:

Step or action	Timeframe
Acknowledge receipt of the complaint	Within 1 business day.
Investigate the complaint, using our internal dispute resolution process. This may result in:	
<ul style="list-style-type: none"> ▪ closure without an IDR where an apology is sufficient, or you are otherwise satisfied with our response. 	Within 5 business days.
<ul style="list-style-type: none"> ▪ an IDR Response where the complaint relates to a default notice or a hardship claim. 	Within 21 days.
<ul style="list-style-type: none"> ▪ an IDR Response for standard complaints (the usual timeframe). 	Within 30 days.

GARDA may take longer than 30 days where it is not reasonable to provide the IDR Response within that timeframe, such as for complex matters (e.g. requiring reconstruction of historic financial records), or where third parties are causing delays beyond our control. We must however notify you within 30 days of the delay, if we do need more time.

4. YOUR RIGHT TO GO TO AFCA

The relevant GARDA licensees are members of the Australian Financial Complaints Authority (**AFCA**), which is a statutory external dispute resolution service.

If GARDA does not resolve your complaint within the required timeframe, or if you are dissatisfied with the IDR Response you receive, you may have rights to file a claim with AFCA¹.

AFCA may be contacted on:

Australian Financial Complaints Authority Limited
 GPO Box 3
 Melbourne VIC 3001
 phone: +61 1800 931 678 (free call within Australia)
 Email: info@afca.org.au
 Website: www.afca.org.au

5. REVIEW AND PUBLICATION OF THIS POLICY

The Chief Operating Officer will review this Complaints Policy from time to time to check it is operating effectively and report to the Board any changes that should be made. This Policy may be amended by resolution of the Board.

This Policy is available on GARDA's website.

Approved and ratified by the Board on 17 November 2021.

¹ Making a claim with AFCA is also free, but you have to cover your legal or other costs unless GARDA is determined by AFCA to be at fault.