



Internal Dispute Resolution Policy

Current as at 24 March 2026

1. Purpose

This Policy establishes Incolink's internal dispute resolution (IDR) framework to ensure that Complaints are managed in a manner that is fair, timely, efficient and transparent. The Policy also supports improved member outcomes, strengthens stakeholder confidence, and ensures that Complaint handling contributes to continuous improvement and risk management.

2. Scope

This Policy applies to all Complaints received by Incolink, regardless of how they are made, and applies to all employees, officers, contractors and representatives involved in the handling of Complaints.

3. Definitions

3.1 The following definitions apply to terms used in this Policy:

- (a) **Business Day** means a day that is not a Saturday, Sunday or any national public holiday in Australia.
- (b) **Complaint** means an expression of dissatisfaction made to or about Incolink, relating to its products, services, staff or the handling of a Complaint, where a response or resolution is explicitly or implicitly expected or legally required. It does not need to be in writing, does not need to use the word 'complaint', and must not be reclassified as feedback or an enquiry to avoid IDR obligations.

4. Complainants

Incolink's IDR process is accessible to a broad range of complainants, including members, former members, beneficiaries, employers, small businesses and other stakeholders interacting with the Fund. The scope of complainants is interpreted broadly to ensure accessibility and fairness.

5. IDR Standards

Incolink maintains a complaint management framework that reflects the IDR standards set out in RG 271. This includes a strong organisational commitment to Complaint handling, ensuring Complaints are valued as a source of insight, and embedding a culture that supports fairness and responsiveness.

Incolink ensures Complaints are easy to lodge, adequately resourced, handled objectively, and supported by appropriate systems, training and governance. Incolink requires staff to take a proactive approach in identifying Complaints, including where dissatisfaction is implied. Complaint data is collected and analysed to identify trends and systemic issues, and is used to drive continuous improvement across the organisation.

6. Complaint Handling Process

Incolink will acknowledge Complaints promptly, generally within one Business Day or as soon as practicable. Each Complaint will be assessed to determine its nature, complexity and risk, and assigned to an appropriate decision-maker. Investigations will be conducted in a fair, objective and thorough manner, taking into account all relevant information. Where possible, Complaints will be resolved at first contact. Where this is not possible, a formal IDR response will be provided.

7. IDR Response Requirements

Where a written IDR response is required, it must clearly set out the outcome of the Complaint, including any actions taken by Incolink. If the Complaint is rejected or only partially upheld, the response must include clear reasons for the decision, findings on material questions of fact, and reference to the information relied upon. The response must provide sufficient detail to enable the complainant to understand the basis of the decision.

8. Timeframes and Exceptions

Incolink will make every reasonable effort to resolve Complaints within 30 Business Days of receipt. Where a Complaint is resolved within five Business Days, a written response may not be required unless requested or otherwise required.

Exceptions to Standard Timeframes:

In limited circumstances, a longer timeframe may be required where there is no reasonable opportunity to respond within 30 Business Days due to complexity or circumstances beyond Incolink's control. A Complaint may be considered complex where it involves historical reconstruction, multiple stakeholders, or detailed technical or legal issues. Circumstances beyond control may include delays in obtaining third-party information or where the complainant is unable to provide necessary information. Where a delay occurs, Incolink must notify the complainant before the expiry of the timeframe, explain the reasons for the delay, and provide an expected response timeframe. Incolink will continue to actively progress the Complaint and minimise delay. All delays will be monitored and reported to the Finance, Audit and Risk Management Committee through the General Counsel.

9. Systemic Issues

Incolink will identify Complaints that indicate systemic issues and escalate these to the Finance, Audit and Risk Management Committee. Systemic issues include recurring Complaints, process failures,

control weaknesses or potential regulatory breaches. Where identified, root cause analysis will be undertaken and remediation actions implemented.

10. Governance and Oversight

Management is responsible for implementing this Policy and ensuring effective Complaint handling. The Board and the Finance Audit and Risk Management Committee will receive regular reporting on Complaint volumes, trends, delays and systemic issues to support oversight and assurance.

11. Reporting

Incolink maintains a central Complaints Register and records all Complaints and relevant data. Complaint data will be analysed and reported regularly to Finance, Audit and Risk Management Committee and Board.