

TRANSFIELD SERVICES INFRASTRUCTURE FUND

COMPLAINTS HANDLING POLICY



1. BACKGROUND

Transfield Services Infrastructure Fund (**TSI Fund**) is a public entity, listed on the Australian Securities Exchange (**ASX**). TSI Fund is committed to responsible corporate governance and accordingly, has endorsed this Complaints Handling Policy as part of its corporate governance framework. References in this policy to TSI Fund include its related entities.

TSI Fund is a triple stapled structure whereby a unit in Transfield Services Infrastructure Trust (**Trust**) is stapled to one share in Transfield Services Infrastructure Limited and one share in TSI International Limited so that none of the securities (unit and shares) can be dealt with separately.

2. PURPOSE OF THIS POLICY

The purpose of this policy is to provide guidance to securityholders in TSI Fund as to how they can make a complaint and how that complaint will be dealt with by TSI Fund.

This policy is prepared in response to the legal obligations of Infrastructure Fund Management Limited (**IFML**) as trustee and responsible entity of the Trust. However, because of the triple stapled structure, it is appropriate and beneficial for this policy to also apply to Transfield Services Infrastructure Limited and TSI International Limited, collectively known as TSI Fund.

3. SOURCES OF LEGAL OBLIGATIONS

The sources of legal obligations behind this policy include the:

- (a) Obligations of IFML as a holder of an Australian Financial Services Licence (**AFSL**);
- (b) Trust's Constitution;
- (c) Trust's Compliance Plan;
- (d) *Corporations Act 2001(Cth)*;
- (e) *Privacy Act 1988 (Cth)* (**Privacy Act**); and

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- (f) The guidelines set out in Australian Standard ISO 10002 2006: Customer Satisfaction – Guidelines for Complaints Handling in Organisations (formerly Australian Standard AS4269-1995).

4. THE MEANING OF COMPLAINT

In this policy, “*complaint*” refers to any expression of dissatisfaction made to a stapled entity of TSI Fund, related to TSI Fund or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected.

A complaint may include but not be limited to, matters such as:

- (a) A securityholder not being satisfied with the level of their investment's performance;
- (b) Not receiving a distribution cheque on time;
- (c) Not having their change of contact details recorded correctly;
- (d) A securityholder continuing to receive marketing material when a request was made to not receive marketing material in the future, or for their details to be removed from any mailing list; or
- (e) A securityholder not being satisfied with the way their personal information is being handled.

5. COMPLAINTS OFFICER

The Company Secretary of TSI Fund is the Complaints Officer.

6. DEALING WITH COMPLAINTS

A complaint can be reported verbally (by telephone or in person) or in writing (by letter, facsimile or by email) to the Company Secretary of TSI Fund or TSI Fund's registry services provider, Computershare Investor Services Pty Ltd (Computershare).

Given that it is likely a securityholder with a complaint will contact Computershare in the first instance, TSI Fund has requested Computershare to provide details of any complaints and contact details of the securityholder to the Company Secretary of TSI Fund.

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All complaints received whether verbal or written, should be:

- (a) Referred to the Company Secretary as soon as it is received; and
- (b) Recorded in the Complaints Register by the Company Secretary.

TSI Fund must provide a securityholder with all reasonable assistance and information that a securityholder may reasonably require for the purpose of making a complaint and understanding the complaints handling procedures of TSI Fund.

Verbal complaints

When dealing with a verbal complaint it is important to:

- (a) Record and confirm the securityholder's details (i.e. name of securityholder, contact number, securityholder's SRN/HIN, number of securities held, name in which the investment is held etc.);
- (b) Understand and confirm the nature and details of the complaint. If the nature of the complaint is complex, the securityholder should be asked to submit their complaint in writing. A securityholder is encouraged to provide such information and assistance required to enable TSI Fund to understand the nature of the complaint and the extent to which the securityholder's rights have been adversely affected;
- (c) Resolve the complaint if possible or commit to a course of action; and
- (d) Outline the process that will be taken to review the complaint if it cannot be resolved at the time.

If the complaint cannot be dealt with satisfactorily over the phone, the securityholder will be requested to put the complaint in writing.

Written complaints

Any written complaints received:

- (a) Will be acknowledged in writing by TSI Fund, within seven days;

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- (b) If possible the written acknowledgment by TSI Fund will also commit to a course of action. For example, if the complaint is relating to the provision of information readily available then the complaint should be resolved immediately. If the complaint needs further investigation or the course of action is unknown, advise the securityholder that further investigation is required and specify a time frame in which they will be contacted about their complaint; and
- (c) Will be dealt with appropriately and within a reasonable time frame having regard to the nature of the complaint.

7. THE IMPORTANCE OF COMPLAINTS

Complaints are important because:

- (a) They highlight problems and errors, and may even identify cases where there is a perception about TSI Fund that may not be correct;
- (b) TSI Fund perceives a complaint as an opportunity for TSI Fund to examine its procedures and processes, evaluate their effectiveness and if necessary refine or improve those procedures and processes; and
- (c) They provide TSI Fund with an opportunity to turn a negative situation into one with a positive outcome.

8. THE COMPLAINTS PROCESS

The complaints process of TSI Fund is as follows:

- (a) The initial response (being the first contact made with the securityholder after the complaint is received) for a written or verbal complaint should be, as far as practicable, within seven days;
- (b) Where possible all complaints should be resolved within 30 days of being received. Any complaint not resolved within 30 days of being received should be referred to the Chief Executive Officer or Chief Financial Officer of TSI Fund;

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- (c) Once resolution of a complaint has been determined a second letter should be sent to the securityholder outlining the decision made in relation to the complaint and any further remedies (if any) available to the securityholder if the securityholder is not satisfied with the outcome;
- (d) In respect of IFML, if a complaint cannot be resolved within 45 days or the securityholder is dissatisfied with the decision, the securityholder may have the right to complain to the Financial Ombudsman Service (**FOS**) or the Privacy Commissioner;
- (e) All complaints answered in writing will contain the following paragraph:

Infrastructure Fund Management Limited is a member of an independent dispute resolution scheme, the Financial Ombudsman Service (FOS). If you feel your complaint remains unresolved or you wish FOS to further investigate your complaint, you can contact FOS as detailed below:

By telephone: 1300 78 08 08

In writing: Financial Ombudsman Service - GPO Box 3, MELBOURNE VIC 3001

By email: info@fos.org.au

- (f) If a privacy complaint is not resolved satisfactorily within 45 days of being received the complaint should be referred to the Privacy Commissioner pursuant to section 36 of the Privacy Act. Further information about the Privacy Commission can be obtained from its website: www.privacy.gov.au. The contact details for the Privacy Commission are:

By telephone: 1300 363 992 (local call anywhere in Australia)

In writing: Office of Privacy - Commissioner, GPO Box 5218, SYDNEY NSW 2001

By email: privacy@privacy.gov.au

9. THE COMPLAINTS REGISTER

The Company Secretary maintains the Complaints Register. The Complaints Register records whom the complaint was from, their SRN/HIN (if applicable), the nature of the complaint and the action taken to resolve the complaint. The Complaints Register should be updated regularly to enable the status of a complaint to be readily ascertained at any point in time. Ultimately the Complaints Register will record all action taken in respect of the complaint received and when it has been resolved.

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Monitoring the Complaints Register

The Compliance Officer will review the Complaints Register quarterly and report to the Board (or its delegated Board Committee) quarterly on:

- (a) The level of complaints received; and
- (b) Resolution of complaints in accordance with this policy, the Trust's Constitution and the Trust's Compliance Plan.

Escalation of complaints will occur if resolution of the complaint does not proceed in accordance with this policy, as determined by the Compliance Officer.

If the Compliance Officer identifies a complaint of a recurring nature, it will be investigated and if possible appropriate action will be taken to prevent the cause of the complaint from occurring in future.

10. CHARGES ASSOCIATED WITH HANDLING COMPLAINTS

Subject to any statutory requirements, complaints handling will be conducted at no charge to the securityholder making the complaint.

11. ACCESSING THIS POLICY

A copy of this policy is located on TSI Fund's website and will be made available to securityholders on request free of charge.

12. REVIEW OF THIS POLICY

The Company Secretary of TSI Fund will be responsible for keeping this policy under review and for liaising with management to ensure it is updated as circumstances warrant, such as a change in the legal obligations of IFML. A formal review of this policy will take place annually.

Any proposed material changes to this policy will be submitted for review by the Risk, Audit and Compliance Committee who will make recommendations to the Board of TSI Fund. The Board of TSI Fund will be responsible for approving this policy and any material changes.