



Transaction Capital
Finance

CUSTOMER CARE POLICY

Version 1.2

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1. Purpose

In keeping with our vision of being 'First Choice for Clients, Customers, and Our People in Receivables Management Solutions', we understand that some of our customers experiencing vulnerability may require specialised care due to their personal circumstances.

We have developed and implemented internal policies, procedures and training to enable our staff to support our vulnerable customers and ensure they are treated with sensitivity, dignity, respect and compassion.

2. Scope

This document applies to all controlled entities within the Recoveries Corporation Holdings Pty Ltd (that include (but are not limited to) Recoveries Corporation Pty Limited, Mason Black Lawyers Pty Ltd, RCL Law Pty Ltd, RCL Services Pte Limited, and Transaction Capital Finance Australia Pty Ltd staff and contractors hereafter referred to as RCHPL in this document.

3. What Can Customers Expect From Us

We are committed to supporting our customers who are experiencing vulnerability, and while we do not provide counselling or support services, we will ensure that your account is appropriately managed within our internal processes.

We encourage our customers who wish to seek external support to refer to the 'External Support for Customers' section of this document for a list of support services.

Should we identify, or if you tell us about your vulnerability, we will work with you to achieve an appropriate outcome. We will:

- 🔗 provide services which are inclusive of all people
- 🔗 work to find a suitable, sustainable, sensitive and compassionate way for us to progress
- 🔗 train our staff to appropriately engage with all customers
- 🔗 be fair, reasonable and ethical
- 🔗 refer you to external support, if necessary and appropriate.

4. Current Support Available

We currently have a wide range of support services available, including:

4.1. Customer Identification

If a customer needs support to meet identification requirements, we will take reasonable measures to support this requirement and subject to our client delegations and acceptance.

Our approach with verification and identification will be flexible and in accordance with AUSTRAC guidance.

4.2. Interpreters and Relay Service

We recognise that some of our customers may experience language barriers in communicating with our office. To ensure you are adequately assisted, we are registered with the Translating and Interpreting Service (TIS), an interpreting service provided by the Department of Home Affairs.

As part of our service to the customer and commitment to assisting vulnerable customers, we will bear the cost of arranging the interpreter service (TIS).

For customers with hearing or speech impairment or disability, you may obtain free assistance through the government initiated National Relay Service (NRS) by contacting 133 677.

4.3. Mental Health

We will treat people with any past or current mental health condition fairly and ensure they are treated accordingly.

Our staff are trained to interact with customers who have, or show signs of having a mental health condition.

4.4. Hardship

We are committed to ensuring that genuine consideration is given to persons who are experiencing hardship as we understand that sometimes in life people can face unexpected changes in their circumstances, and our approach is to treat customers with courtesy and respect at all times.

We will respect and uphold your rights as provided under the Consumer Credit Legislation Amendment (Enhancements) Act 2012, the Banking Code of Practice (BCoP) and the General Insurance Code of Practice (GICoP).

We will work with you to ensure relief is provided for anyone experiencing hardship, and that the principles applied in the determination of hardship are consistent throughout our organisation and as allowed under delegations provided to us by our client.

If you are experiencing hardship, to help us assist you, we ask that you:

- ② contact us as soon as you begin to experience hardship – communication is crucial
- ② keep us informed of any changes in your circumstances, and contact details
- ② acknowledge the debt and the obligation to repay the debt
- ② contact a counsellor or relevant consumer representative if required, to discuss your situation and the options available;
- ② communicate in an open and honest fashion, any information that will assist us to make a decision in relation to your hardship status
- ② supply evidence of hardship if required which may include, but not limited to a statement of position, evidence that you have consulted with or have an appointment to consult a financial counsellor, a statutory declaration from a medical practitioner.

4.5. Elder Abuse

We are committed to ensure that the rights of our Elders are protected. Internal processes are in place to assist with the management of accounts where Elder abuse is identified.

4.6. Family and Domestic Violence

We recognize that some of our customers may be subject to family and domestic violence and may require extra levels of care.

Internal processes are implemented to help minimise the risk of harm in our interactions with vulnerable customers, and to help ensure timely, consistent and targeted assistance is provided to those affected by family violence.

We encourage customers to tell us about their circumstances so that we can work with them to arrange support, otherwise, there is a risk that we may not identify this need.

We do not require evidence of an intervention order to trigger the requirements. Instead, a customer will be treated as per this policy if:

- ② the customer self-identifies to the staff member as being affected by family violence or
- ② the staff member identifies that the customer may be affected by family violence.

4.7. Joint Facilities and Family Violence

Customers may enter into loans or other facilities jointly with one or more other borrowers which at times, can have problems arise. This will commonly occur where there is a relationship breakdown or other factors such as family violence and financial abuse. When dealing with issues arising from joint facilities we are expected to follow some general principles when engaging with customers in this situation:

- understand that these customers are likely to be experiencing considerable stress
- be willing to work with the customers individually
- be flexible in our approach
- be mindful of any safety concerns.

Some of the complaints that could commonly occur from joint facilities include:

- one borrower is pressured to enter into a loan which is not for their benefit, or they are unaware that a loan has been taken out in their name.
- a guarantee is signed under duress, or else the guarantor was misled and did not understand what they were signing.
- One borrower wants to split or sever a joint loan following a relationship breakdown, so that they become responsible for the none or only part of the debt, but the other borrower does not agree.
- One borrower is experiencing financial difficulty and requires hardship assistance, while the other borrower refuses to engage in any hardship discussions.
- co-borrowers disagree about how a joint debt should be repaid.
- one account holder makes withdrawals or other transactions without the other account holder's knowledge or consent.
- a customer's privacy is breached which may have serious consequences if family violence is involved.
- one borrower's actions result in credit reporting and default listing of both co-borrowers.

It is important that we do not share current information about one borrower with the other borrower in the event a borrower is experiencing family violence as this may put the customer at further risk.

We must not require a customer to contact a co borrower to obtain information or consent in relation to a request for assistance. Where there is a co-borrower who is not involved in the request for assistance and who is not contributing to the loan, then it would be inappropriate for us to ask for information about that co-borrower's financial circumstances.

Solutions offered to the borrower seeking assistance will depend on that borrower's individual circumstances. Options for assistance may include:

- reducing or waiving repayment amounts, interest and/or fees for a period of time.
- agreeing not to pursue one borrower for the loan.
- waving part or all of the debt

We may need to seek our client's instructions to initiate any of the above actions.

4.7.1. What Can Customers Expect From Us

We will engage with customers affected with family violence with sensitivity, dignity, respect and compassion. We will:

- be aware of the prevalence and practical effects of family violence
- attempt to identify if a customer is experiencing violence and sometimes the perpetrator of those affected by family violence
- engage with the customers in a supportive manner
- have careful and sensitive conversations with a customer affected by family violence – without disclosing to the perpetrator of such violence that the staff member is aware of the family violence
- understand that perpetrators of family violence may attempt to convince our staff member to disbelieve or dismiss someone affected by family violence

- 🕒 understand the strict confidentiality and privacy in relation to a customer affected by family violence - protect private, confidential and personal information of customers
- 🕒 have controls to protect particular information, such as the customer’s physical address, to ensure there is no risk of deliberate or inadvertent disclosure
- 🕒 ensure the customers physical address is securely protected with a password requirement within our systems and is only available to staff that require such access
- 🕒 ensure family violence information is not disclosed to any perpetrator and is accessible only to authorized staff members
- 🕒 protect the right to privacy of customers who have notified us of their need for additional support from someone else (for example, a lawyer, consumer representative, interpreter or friend)
- 🕒 ensure that any protection put in place applies across all accounts that RCHPL holds for the customer where we are aware multiple accounts exist
- 🕒 give the customer control over how their personal information is shared with other parties where possible
- 🕒 discuss safe ways to communicate with the customer and make a record in the file (ie, good time to talk or if it is safe to leave a phone message, send a text message or send an email)
- 🕒 understand the need for flexible arrangements and handle collection arrangements sensitively
- 🕒 keep in mind that a customer affected by family violence may prefer to speak to a person of the same gender
- 🕒 minimise the number of times a customer affected by family violence needs to disclose information about family violence because doing so can have a traumatising effect or they may not always be in a position to talk about their circumstances
- 🕒 make it simple for the customer to appoint an agent or representative and work with the customer’s representative
- 🕒 refer the customer to a qualified, independent interpreter to assist with communication
- 🕒 escalate any issues to a leader where required
- 🕒 refer customers to specialist family violence services, where appropriate
- 🕒 cases of family and domestic violence to be removed from all collection activity via a flagging system and reported to the Customer Care Team weekly to ensure clients are notified.

4.8. Complaints

We will ensure we treat all complaints seriously with dedicated staff and systems in place to manage complaints. We adhere to all quality assurance requirements in accordance with our Quality Management Systems certification ISO 9001.

If you wish to lodge a complaint, please contact us on 1300 663 060 (between the office hours of 8:30 AM and 5:00 PM AEST). Please have your recoveriescorp reference number when calling to allow us to promptly assist you.

Recoveries Corporation Pty Ltd is a member of the external dispute resolution scheme administered by the Australian Financial Complaints Authority (AFCA). If you are dissatisfied with the outcome of our Internal Dispute Resolution process, you may contact AFCA via telephone (free call within Australia) at 1800 931 678 9:00am–5:00pm AEST/AEDT weekdays, email at info@afca.org.au, fax at (03) 9613 6399 or mail at GPO Box 3 Melbourne, VIC 3001.

4.9. External Support for Customers

| Agency | Contact Information |
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| <i>Immediate danger</i> | If someone is in immediate danger, call 000 |

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| <i>National Debt Help Line</i> | <p>National Debt Helpline is a not-for-profit service that helps people tackle their debt problems. The professional financial counsellors offer a free, independent and confidential service.</p> <p>Call 1800 007 007</p> |
| <i>Elder abuse</i> | <p>1800 ELDERHelp line - The Elder Abuse Help Line directs you to your state or territory service. It's a free information and support service. Operating hours vary.</p> <p>Call 1800 353 374 or use the Service Finder to find help in your area.</p> |
| <i>Family Relationship Advice</i> | <p>The Family Relationship Advice Line can help you with family issues and separation. They can also refer you to local services for more help.</p> <p>Call 1800 050 321</p> |
| <i>Kids Helpline</i> | <p>Kids Helpline is a free service for young people aged 5 to 25.</p> <p>Call 1800 551 800 at any time or go to the Kids Helpline website kidshelpline.com.au</p> |
| <i>Lifeline</i> | <p>Lifeline offers personal crisis support services if you're affected by family and domestic violence.</p> <p>Call 131 114 at any time</p> |
| <i>MensLine Australia</i> | <p>MensLine Australia is a phone and online support service. They provide specialist help to people affected by family and domestic violence. They also offer support to people using violence.</p> <p>Call 1300 789 978 at any time or go to the website mensline.org.au</p> |
| <i>MoneySmart</i> | <p>MoneySmart can help you manage your money. They have information about urgent money help and divorce and separation. Visit their website moneysmart.gov.au</p> |
| <i>Family violence</i> | <p>The National Sexual Assault Domestic Violence Counselling service, offers confidential online and telephone counselling, information and referral services.</p> <p>Visit www.1800respect.org.au or you can call 1800 737 732 at any time</p> |
| <i>Kildonan UnitingCare</i> | <p>Kildonan UnitingCare is an innovative and trusted community service organisation</p> <p>Call 1800 002 992</p> |
| <i>National Legal Aid</i> | <p>National Legal Aid can help you find the legal aid commission in your state or territory.</p> |

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| | www.nationallegalaid.org/contact/ |
| Australian Capital Territory | <p>The Legal Aid Commission (ACT) is an independent statutory authority established under the Legal Aid Act 1977. The Commission's function is to provide legal assistance in the Australian Capital Territory. Legal assistance includes legal information and advice, duty lawyer services, and grants of financial assistance.</p> <p>Legal Aid information helpline: 1300 654 314</p> <p>Tenancy Advice Service: 1300 402 512</p> <p>Older Persons ACT Legal Service (OPALS): (02) 6243 3436</p> <p>Youth Law Centre: (02) 6173 5410</p> |
| New South wales | <p>NSW Health Education Centre Against Violence (ECAV)</p> <p>The NSW Health Education Centre Against Violence (ECAV), is a state-wide unit responsible for workforce development in the specialist areas of prevention and response to violence, abuse and neglect, including a specific focus on Aboriginal and Cultural and Linguistically Diverse Communities</p> <p>Call 02 9840-3735</p> <p>Email: wslhd-ecav@health.nsw.gov.au</p> <p>www.ecav.health.nsw.gov.au</p> <p>Women's Domestic Violence Court Advocacy Services</p> <p>WDVCASs service 117 local courts across NSW and provide women and their children who have experienced domestic and family violence with information, advocacy and referrals.</p> <p>Call 1800 938 227</p> <p>The Gendered Violence Research Network (GVRN)</p> <p>The GVRN unites the significant domestic and international research expertise of UNSW to respond, prevent and eliminate gendered violence in Australia and beyond.</p> <p>Ask LOIS (Women's Legal Service NSW)</p> <p>Provides specialist legal services relating to domestic violence, sexual assault, family law, discrimination, victims support, child protection, human rights and access to justice.</p> <p>Call 02 8745 6900 or email asklois@wlsnsw.org.au</p> <p>LawAccess NSW</p> |

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| | <p>LawAccess NSW is a free government telephone service that provides legal information, referrals and in some cases, advice for people who have a legal problem in NSW.</p> <p>Call 1300 888 529</p> <p>National Relay Service (NRS) - Ask for LawAccess NSW on 1300 888 529.</p> <p>Call Translating and Interpreting Service (TIS) on 131 450 and ask for LawAccess NSW</p> <p>Legal Aid NSW</p> <p>Legal Aid NSW provides legal services to disadvantaged clients across NSW in most areas of criminal, family and civil law.</p> <p>Call 1300 888 529</p> |
| Northern Territory | <p>Northern Territory Legal Aid Commission</p> <p>Services include helpline, legal advice, legal representation, duty lawyer, family dispute resolution, Community Legal Education and policy and law reform.</p> <p>Call 1800 019 343.</p> |
| Queensland | <p>Queensland Centre for Domestic and Family Violence Research (QCDFVR)</p> <p>QCDFVR is supported by CQUniversity to be a resource for the domestic and family violence sector and the sexual assault sector.</p> <p>Call 07 4940 3320</p> <p>Legal Aid Queensland</p> <p>Provides legal help to financially disadvantaged people about criminal, family and civil law matters.</p> <p>Call 1300 65 11 88</p> |
| South Australia | <p>Legal Service Commission South Australia</p> <p>The Legal Services Commission provides legal assistance to South Australians.</p> <p>Call 1300 366 424</p> |
| Tasmania | <p>Legal Aid Commission of Tasmania</p> <p>Provides preventative services such as information about the law through our website and through community legal education sessions. Delivers early intervention services, face- to-face consultations, duty lawyer services, minor assistance, and mediation services, legal representation in court delivered through grants of aid to private lawyers and to in-house lawyers.</p> <p>Call 1300 366 611</p> |

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| <p>Victoria</p> | <p>Domestic Violence Resource Centre Victoria</p> <p>The core is building the capability of those who prevent and respond to violence against women in Victoria.</p> <p>Call (03) 8346 5200 or (03) 8346 5266 (Training enquiries)</p> <p>Victoria Legal Aid</p> <p>Helps people with their legal problems and focus on protecting the rights of Victorians and representing those who need it the most.</p> <p>Call 1300 792 387</p> |
| <p>Western Australia</p> | <p>Women’s Council for Domestic and Family Violence Services</p> <p>The role is to provide a voice on domestic and family violence issues that facilitates and promotes policy, legislative and programmatic responses relevant to women and children who have experienced domestic and family violence.</p> <p>Call 08 9420 7264</p> <p>Legal Aid WA</p> <p>Legal Aid WA aims to promote access to legal services and information for all West Australians in civil law, criminal law, family law and community legal education.</p> <p>Call 1300 650 579</p> |