



# Internal Dispute Resolution Policy

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*Reviewed 1 October 2021*

## 1. Objective of this policy

This policy is intended to ensure that complaints are handled fairly, efficiently, and effectively.

Our internal dispute resolution policy is intended to:

- enable us to respond to issues raised by people expressing dissatisfaction in a timely manner.
- provide information that can be used by Mozo to deliver improvements to the quality of our service, staff and complaints handling.
- ensure that those wishing to raise concerns are aware of the avenues open to them.

This policy provides guidance to Mozo staff on the steps that should be followed when an expression of dissatisfaction is received, as well as detailing the avenues available to anyone wanting to make a complaint. All staff should follow the processes in this document whenever an expression of dissatisfaction or complaint about Mozo's services is received.

ASIC has issued RG271 which provides detail on how complaints should be handled along with some minimum regulatory requirements.

## 2. What is a complaint?

A complaint is any expression of dissatisfaction with, or dispute about, a service provided by us. Complaints may be raised by consumers or small businesses (defined as a business with up to 100 employees).

ASIC expects us to take a proactive approach toward identifying complaints. We must respond to complaints no matter the channel (including social media) used by the person raising the concerns (the complainant) has chosen to use.

## 3. How a complaint can be made

Complaints can be received through a variety of channels, including:

- email (nothappy@mozo.com.au)
- phone (02 9037 4366)
- letter (P.O. Box 1179, Queen Victoria Building, NSW, 1230)
- website form (<https://mozo.com.au/contact>)
- social media accounts controlled by Mozo.

## 4. What information we will need

To allow us to address complaints quickly and efficiently some information will be gathered and recorded in our Complaints Register.

- The name and contact details of the person lodging the complaint.
- The issue raised and any desired outcomes.
- Copies of any documents or screen shots relevant to the complaint.
- Any steps already taken to resolve the complaint.

Mozo staff will ensure that this information is handled in accordance with Mozo's [Privacy Policy](#) and any applicable privacy laws.

## 5. Acknowledging complaints

We will acknowledge each complaint promptly, within one business day of the complaint being made, or as soon as practicable.

Consideration will be given to the most appropriate medium (e.g. email, phone call, letter) for communicating with the person making the complaint. We will take into account any preference expressed by the complainant about communication methods.

Care must be taken to protect consumer privacy, and particularly when the complaint has been made via social media. Only share the personal details of the complainant with those involved at Mozo who are handling the complaint or the Compliance team.

If we become aware of someone wishing to make a complaint but needing additional assistance (such as people with disabilities or language difficulties) we will help them to lodge their complaint in any way we can. Staff should seek advice from Compliance or Management if they are unsure what to do.

## 6. Assessing and addressing complaints

After acknowledging receipt of the complaint we will assess whether the issue raised is within our control. We will also consider the outcome/s sought by the complainant and, where there is more than one issue raised, determine whether each issue needs to be separately addressed.

When determining how a complaint will be managed, we will consider:

- How serious, complicated or urgent the complaint is
- How the person making the complaint is being affected
- The risks involved if resolution of the complaint is delayed, and
- Whether a resolution requires the involvement of other organisations.

After assessing the complaint, we will consider how to manage and prioritise it. To manage a complaint we may:

- Give the person making a complaint information or an explanation
- Gather information from the product, person or area that the complaint is about, or
- Investigate the claims made in the complaint.

We will keep the person making the complaint up to date on our progress, particularly if there are any delays (see Response Times below).

## 7. Responding to the complaint

Following consideration of the complaint and any investigation into the issues raised, we will contact the person making the complaint provide them with an IDR Response which includes the following information:

- the outcome of the complaint and any action we took;
- the reason for our decision in detail;
- if we are rejecting or partially rejecting the complaint we need to set out our findings on material questions of fact, referring to the information that supports our finding;
- the remedy or resolution that we have proposed or put in place; and
- their right to take their complaint to AFCA if they are not satisfied with our response, including AFCA contact details.

A template for IDR Responses has been made available to the appropriate

Mozo staff. If responding via email or other method of communication the structure provided in the template should be followed. Responses must be sent to Compliance for review before sending.

An IDR Response is not required if the complaint has been closed within 5 business days of receipt because we have either resolved the complaint to the complainant's satisfaction, or we have given the complainant an apology because we cannot take further action to reasonably address their complaint. However, if for some reason you believe we cannot take further action, please first consult with Compliance.

When determining whether a complaint has been resolved to the complainant's satisfaction we will consider whether the complainant has confirmed they are satisfied (either verbally or in writing) and they do not wish to take the matter further, or we reasonably believe that the complaint has been resolved to their satisfaction.

Even if the above conditions have been met, if the complainant requests a written response we must provide one.

## **8. Response times**

As set out above, the complaint should be acknowledged within one business day of receipt.

Complaints should be resolved no more than 30 days from receipt.

If we are unable to resolve the complaint within 30 days, the complainant must receive an 'IDR delay notification' that informs them of:

- the reasons for the delay;
- their right to complain to AFCA if they are dissatisfied;
- the contact details for AFCA.

IDR Delay Notifications must not be used as a way to simply delay having to take action or provide a response to a complaint. It must be used in certain circumstances only. This includes that there is no reasonable opportunity to provide IDR response within relevant time frames above because:

- the resolution or complaint is particularly complex;
- there are circumstances beyond Mozo's control causing complaint management delay.

If for some reason staff believe they will be unable to respond to a complaint within the required response time, please contact Compliance as soon as possible.

A template for IDR Delay Notifications has been made available to the appropriate Mozo staff. Once an IDR Delay Notification has been prepared it

must be sent to Compliance for review before sending.

## 9. Record keeping and review

We will keep a summary of:

- How we managed the complaint
- The outcome of the complaint (including whether it or any aspect of it was substantiated, any recommendations made to address problems identified and any decisions made on those recommendations, and any remedies or compensation paid), and
- Any outstanding actions that need to be followed up.

We will ensure that outcomes are properly implemented, monitored and reported to the relevant senior management.

Mozo maintains a Complaints Register which is available to the appropriate staff handling complaints.

It is critical that Mozo staff who are handling a complaint ensure that they are accurately recording **complete** details of complaints in the Complaints Register per the details specified above and **must** ensure that **all** complaints have been appropriately responded to per this policy and appropriate and complete details have noted before the complaint is closed in the Complaints Register. We also rely on our representatives to provide complete details of the complaint.

## 10. Unreasonable Complaints

Please contact Compliance if you receive a complaint from a complainant who exhibits unreasonable or challenging behaviour.

## 11. Mozo representatives

This process applies to all Representatives appointed under Mozo's ACL and AFSL. Representatives are required to advise Mozo of any complaints received about their financial services or about any products/providers arising from the Mozo comparison tables displayed by them. Representatives must advise us as soon as they receive a complaint.

Our representatives must also adhere to Mozo's [Privacy Policy](#) and any applicable privacy laws with respect to such complaints.

## **12. Continuous improvement**

The information compiled in the Complaints Register will be analysed regularly to identify any trends or systemic issues to enable action to be taken to address those issues.

## **13. Systemic issues or complainant trends**

If staff become aware of a complaint that may indicate a systemic issue or complainant trends, please alert the compliance team who will investigate further. Some examples of systemic issues are an incorrect calculation being performed on site, incorrect or misleading advertising, or a problem with the way we show product data.

## **14. Reporting internally about complaints**

Mozo Compliance will report complaints internally as appropriate to senior management and the firm's board as necessary.

If staff identify a complaint/s which they think should be brought to the attention of Compliance and the senior management or Mozo's board, please contact the Compliance team to discuss further.