

Complaints and Disputes Handling Policy

RC Platform Pty Ltd

ACN 679 306 622

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1. Purpose

- 1.1. This Policy sets out **RC Platform Pty Ltd.**'s ("**Company**", "**IPLiving**", "**we**", "**us**") commitment to fostering a culture of transparency, accountability, and responsiveness in the management of complaints and disputes.
- 1.2. This Policy ensures that all residents, their families, employees, contractors, and other stakeholders have access to a clear, fair, and confidential process for raising concerns.
- 1.3. This Policy complements IPLiving's **Whistleblower Policy**, which applies to serious disclosures of misconduct and illegal behaviour, by providing a structured approach to resolving everyday concerns, service complaints, and disputes.
- 1.4. This Policy outlines a transparent, and timely process for receiving, managing, and resolving complaints, in accordance with applicable State and Territory retirement village legislation (including the Retirement Villages Act 1986 (Vic) and the Retirement Villages Act 1999 (NSW)), and good practice standards.

2. Our Mission and Values

- 2.1. This Policy supports the Company's commitment to fostering safe, respectful, and inclusive communities, consistent with our mission and values.
- 2.2. Our mission is to enhance the quality of life and wellbeing of residents, employees, and stakeholders by ensuring concerns are heard, addressed fairly, and resolved in a timely and transparent way.
- 2.3. Our approach to complaints and disputes is guided by the following core values, which shape our decision-making and culture of respect and accountability:
 - **Customer (Resident) First Mentality** – We prioritise the needs, wellbeing, and rights of residents and their families in every decision and action, ensuring concerns are heard, respected, and addressed promptly.
 - **Act with Integrity and Respect** – We foster trust, fairness, and transparency by treating all parties with dignity and ensuring every complaint or dispute is managed professionally, confidentially, and without bias.
 - **Responsible for Long-Term Sustainability** – We resolve issues constructively to protect relationships, enhance community cohesion, and support the long-term sustainability and resilience of our villages.
 - **Embrace Continuous Improvement** – We learn from complaints, feedback, and disputes to strengthen our services, governance practices, and resident experience.
 - **Strive to be the Preferred Choice** – We aim to be recognised as a fair, responsible, and trusted operator by consistently demonstrating excellence in how we respond to concerns and support our communities.
- 2.4. This Policy affirms that complaints and disputes are not obstacles, but opportunities to improve services, strengthen relationships, and support safe, thriving communities.

3. Scope and Application

- 3.1. This Policy applies to all residents, family members, visitors, employees, contractors, and volunteers across IPLiving-operated communities.
- 3.2. It covers:
 - **Resident-to-resident disputes** (e.g., conduct affecting another’s use/enjoyment of the community).
 - **Management complaints** (e.g., services, operations, or decisions impacting residents).
 - **Other stakeholder complaints** (employees, contractors, community).
- 3.3. This Policy **does not** apply to:
 - employee grievances that are dealt with under IPLiving’s human resources policies;
 - complaints or disputes already being considered by an external body such as a court, tribunal, Ombudsman, or State/Territory fair trading/consumer authority;
 - complaints that have already been resolved under this Policy, unless new and material information becomes available;
 - matters outside IPLiving’s control or legal authority to resolve;
 - anonymous complaints where insufficient information is provided to allow any meaningful assessment or investigation (these may still be logged and monitored for thematic risks).
- 3.4. Nothing in this Policy limits or restricts the right of any resident or stakeholder to seek assistance or resolution from a State/Territory consumer affairs body, Ombudsman, or tribunal (for example, Consumer Affairs Victoria, NSW Fair Trading, the Victorian Civil and Administrative Tribunal (VCAT), or the NSW Civil and Administrative Tribunal (NCAT)), at any time.

4. Responsibilities

- 4.1. **All Employees** – Actively listen, record, and report complaints promptly.
- 4.2. **Community Managers** – First point of resolution; responsible for investigating complaints at the local level.
- 4.3. **General Manager Operations** – Escalation points for unresolved complaints or disputes; responsible for ensuring systemic issues are addressed.
- 4.4. **Board** – Oversight of trends, systemic issues, and disputes with material risk exposure.

5. Lodging a Complaint or Dispute

5.1. Ways to Lodge a Complaint or Dispute

5.1.1. Complaints may be raised:

- Verbally (in person or phone)
- In writing (letter, email, online form- **IPLiving Feedback and Complaint Form**)
- Through an advocate or representative

- Anonymously (noting anonymous disputes will be treated as complaints unless sufficient detail is provided to progress a dispute)

5.1.2. To assist prompt and fair resolution, complainants are encouraged (but not required) to provide:

- a brief description of the issue, including relevant dates, times and locations;
- the names of any persons involved, where known;
- steps already taken to try to resolve the matter;
- any supporting documents (letters, emails, photos, notes); and
- their preferred outcome or resolution.

5.1.3. Support services (translation, interpreters, cultural liaisons) will be provided as needed.

5.2. Third Parties acting on behalf of residents

5.2.1. At times, a resident’s family member, friend, or representative may raise a complaint or dispute on their behalf.

5.2.2. IPLiving will always protect residents’ privacy and only share personal information with third parties if we are satisfied, they are legally entitled to act for the resident.

5.2.3. Before we can respond directly to a third party, we may ask for evidence such as:

- A certified copy of a valid power of attorney or enduring power of attorney;
- Evidence that the conditions of a power of attorney have been met (e.g. medical evidence if it starts when the resident loses capacity);
- A certified copy of guardianship or administration orders issued by a Tribunal or Court; or
- If the resident has passed away, a certified copy of probate or letters of administration.

5.2.4. Until verification of authority is provided, IPLiving will only communicate directly with the resident to avoid breaching our Privacy Policy and legal obligations.

5.2.5. For clarity, all rights and obligations of the resident also apply to their lawfully appointed representative.

5.2.6. Where a resident has declined to authorise a third party, IPLiving will respond directly to the resident and not disclose personal information.

6. Complaints and Disputes Handling Process

6.1. Complaints and Disputes Handling Process

Stage	Action	Obligation/ Timeframe
1- Lodgement	Complaint or dispute raised with the Community Manager (first point of contact). If raised with IPLiving Management, it may be referred back to the Community Manager to manage.	If unresolved within 72 hours , it must be recorded.

Stage	Action	Obligation/ Timeframe
2- Acknowledgement	Complaint acknowledged by the Community Manager or IPLiving Team.	Acknowledge within 2 business days (verbal or written).
3- Initial Resolution (≤72 hrs)	Attempt to resolve complaint locally and informally.	If resolved, record outcome. If not, move to formal process.
4- Formal Investigation	If unresolved, Community Manager develops a resolution plan and informs parties of process and timelines. May involve seeking specialist, technical, or legal input.	Mandatory record; placed on complaint file.
5- Ongoing Action	Manager carries out agreed actions, communicates progress to parties, and documents each step	Provide updates every 14 business days if resolution not achieved within 14 business days .
6- Resolution/ Closure	Parties informed of outcome. If resolved, file is closed with full documentation. If unresolved, parties advised of right to escalate to Consumer Affairs Victoria or other external bodies.	Outcome must be recorded. Internal process must be completed within 45 days .

6.2. Closure of Complaints and Disputes

6.2.1. A complaint or dispute will be considered closed when:

- the complainant confirms they are satisfied with the outcome; or
- the complainant withdraws the complaint; or
- IPLiving has taken all reasonable steps to address the matter, communicated a final position in writing, and advised the complainant of any further internal or external avenues; or
- the matter has been referred to an external body (e.g. CAV, Fair Trading, DSCV, VCAT, NCAT) and is under active consideration.

6.2.2. IPLiving may discontinue the internal process where the complainant refuses to engage, does not provide information reasonably required to progress the matter, or behaves in a way that is abusive, threatening, or otherwise unsafe (see clause 10.5).

6.3. Record Keeping

6.3.1 Once a complaint or dispute moves beyond informal resolution, the Community Manager must open a case in the Complaints and Disputes Log and ensure all key documents and information (including date received, parties involved, summary of issue(s), category (e.g. service, interpersonal, safety), action(s) taken, outcome, and follow-up are attached to the case file.

6.3.2 All records must be accurate, secure, and compliant with privacy obligations and relevant legislation. Records of complaints and disputes will be retained for at least seven (7) years, or longer where required by law.

6.4. Escalation

6.4.1 If resolution cannot be achieved at the Community Manager level, the complaint may be escalated to:

- General Manager – Operations
 - Executive Leadership Team
 - Board
- 6.4.2 Residents retain the right to seek independent dispute resolution (State/Territory Consumer Affairs or Ombudsman, Retirement Village Dispute Resolution Scheme (where applicable)) at any time.
- 6.4.3 IPLiving will act in good faith and will not delay, prevent, or discourage external escalation.

7. Resident to Residents Disputes

- 7.1. Residents are encouraged to raise concerns respectfully. To resolve a resident-to-resident dispute, the Company:
- request for residents to speak directly, in a respectful manner to resolve their concerns;
 - if direct resolution is not suitable, the Community Manager will offer a supported discussion or mediation. Participation in mediation is voluntary, except where formal legislative procedures apply;
 - where mediation is declined, and risk to safety or wellbeing exists, reasonable management measures may be enacted (e.g. behaviour agreements, facility access adjustments), subject to approval by the General Manager – Operations or Group General Counsel;
 - residents will be reminded of their obligations under Community Rules and relevant Acts.
- 7.2. Mediation
- Mediation may be informal (facilitated by the Community Manager or GM-Operations) or formal (involving an independent mediator).
 - All parties will be given reasonable notice of any formal mediation, including the purpose, process, and possible outcomes.
 - All participants must behave respectfully and in accordance with the IPLiving Code of Conduct and retirement community rules. Mediation may be paused or terminated if conduct becomes abusive, threatening, or otherwise unsafe.

8. Disputes between IPLiving and Resident

- 8.1. Occasionally, disputes may arise between IPLiving and a resident. These usually happen when one party believes the other has not met their obligations under the residence contract or the retirement villages legislation.
- 8.2. If a dispute occurs, IPLiving will invite the resident to meet with a representative, such as the Community Manager, or where appropriate, the General Manager- Operations.
- 8.3. The purpose of this meeting is to confirm IPLiving's understanding of the dispute and discuss the steps both parties consider necessary to resolve the issue.
- 8.4. Where the Community Manager is involved in the dispute or there is a conflict of interest, an alternative representative (GM- Operations or Group Legal Counsel) will handle the matter.

9. Advocacy and Support

- 9.1. If the internal dispute resolution process is unable to satisfactorily resolve the concerns, residents may choose to follow the external dispute resolution process.
- 9.2. The Community Manager will ensure that residents are able to access contact information regarding external dispute resolution, depending on the State or Territory in which the retirement community is located, this may include (for example):
 - Consumer Affairs Victoria (CAV) 1300 558 181 | www.consumer.vic.gov.au
 - Dispute Settlement Centre of Victoria (DSCV) 1300 372 888 | www.justice.vic.gov.au/disputes
 - Residents of Retirement Villages Victoria (RRVV) 1800 220 950 | www.rrvv.org.au
 - Victorian Civil and Administrative Tribunal (VCAT) – www.vcat.vic.gov.au
 - NSW Fair Trading – www.fairtrading.nsw.gov.au
 - NSW Civil and Administrative Tribunal (NCAT) – www.ncat.nsw.gov.au
- 9.3. Equivalent State/Territory bodies will be communicated to residents in each community.

10. Confidentiality and Privacy

- 10.1. All complaints and disputes are handled confidentially and in accordance with the Australian Privacy Laws, and any information disclosed to third parties will be strictly limited to what is necessary for dispute resolution.
- 10.2. Complainants are protected from victimisation or retaliation (aligned with IPLiving's **Whistleblower Policy**).
- 10.3. Information disclosed only as necessary to investigate or as required by law.
- 10.4. IPLiving is committed to ensuring that complaints and disputes are managed in a safe and respectful environment.
- 10.5. Where conduct becomes unreasonable, for example, repeated aggressive language, threats, harassment of employees or residents, or excessive and unreasonable demands, IPLiving may:
 - limit the channels or frequency of communication;
 - nominate a single point of contact;
 - temporarily pause the complaint process; or
 - close the matter where it is no longer possible to progress it fairly or safely.
- 10.6. Serious threats or abusive conduct may be referred to the police or other appropriate authorities.

11. Advocacy and Support

- 11.1. Residents may seek help from:
 - Family, friends, or representatives.
 - Professional advocates (Legal Aid, Seniors Rights, RRVV).
 - Interpreters or cultural support (arranged by IPLiving).

12. Reporting & Transparency

- 12.1. To demonstrate accountability, meet legislative obligations, and support continuous improvement, IPLiving will ensure robust reporting and oversight of complaints and disputes handling in line with applicable State and Territory retirement villages legislation and other applicable regulations.
- All complaints will be recorded in a secure **Complaints and Disputes Log**.
 - Monthly reports on complaints and disputes will be provided to the GM- Operations and IPLiving Executive Team.
 - Quarterly summaries of complaints and disputes data, including themes and trends, will be provided to the Board for governance oversight.
 - An annual de-identified report of complaints and disputes data will be prepared for each community and shared with residents and committees at annual meetings. This will summarise key issues, themes, outcomes, and actions taken to improve services.
- 12.2. Residents may request a summary of disputes and outcomes relevant to their community, subject to privacy obligations.

13. Training and Awareness

13.1. Training

- 13.1.1. IPLiving will ensure that all Community Managers and employees involved in the internal complaints and disputes resolution framework are appropriately trained. Training will cover:
- The internal complaints and dispute resolution process, including employees' roles and responsibilities;
 - Expected timeframes for acknowledgement, response, and resolution; and
 - Possible outcomes and further avenues available if a matter is not satisfactorily resolved.

13.2. Resident Feedback and Surveys

- 13.2.1. IPLiving will actively seek resident views and feedback through regular resident surveys.
- 13.2.2. These surveys will invite residents to share their experiences and satisfaction with services, including their views on how complaints and disputes are managed.
- 13.2.3. Feedback will be used to drive continuous improvement and ensure services remain responsive, respectful, and of high quality.
- 13.2.4. Results of the surveys will be shared with the IPLiving Executive Team and the Board.

13.3. Policy Access

- 13.3.1. This Policy and process will be published on the IPLiving website.
- 13.3.2. Copies will be included in employee handbooks and reinforced through ongoing training programs.
- 13.3.3. Residents will have access to the process through:
- posting on community noticeboards;
 - inclusion in resident handbooks and orientation programs; and

- availability on request from the Community Manager.

14. Contact Information

General Manager – Operations

Name: Nathan Broad

Phone: 0447 923 881

Email: nbroad@ipliving.com.au

15. Policy Review

- 15.1. This Policy will be reviewed by the CEO at least once **every two years, in consultation with the GM-Operations and GGC**, to ensure it remains effective and meets the best practice, and the Company’s needs.
- 15.2. The GM- Operations is responsible for monitoring implementation and reporting.

16. Definitions

Type	Definition
Complaint	An expression of dissatisfaction made to IPLiving about services, decisions, actions or inactions that requires a response or resolution.
Dispute	A disagreement between a resident (or residents) and IPLiving, or between residents, usually relating to rights or obligations under residence contracts, community rules, or applicable legislation.
General Feedback Request /	A comment, suggestion, compliment, or request (for example, maintenance or information) that does not require a formal complaints or dispute process.
Serious Complaint	A complaint involving allegations of misconduct, breaches of law, unsafe practices, financial impropriety, systemic failure, or issues that may present significant health, safety, regulatory, or reputational risk.

Approved by the CEO on: 19 January 2026

Next Review Date: 19 January 2028

Policy Owner: General Manager Operations

17. Annexure 1- IPLiving Feedback & Complaint Form

Tell Us About It

At IPLiving, your feedback is important. Whether you want to share your appreciation, raise a concern, or lodge a formal complaint or dispute, your feedback helps us maintain a community where respect, wellbeing, and quality of life thrive — in line with the IPLiving Code of Conduct.

Your Details

Name: _____

Unit/Villa Number: _____

Phone Number: _____

Email: _____

Preferred Contact Method: Phone Email In writing

Are you submitting this on behalf of someone else? Yes No

If yes, what is your relationship to them? _____

Type of Feedback (Please tick one)

Compliment Complaint/Dispute Suggestion

Details of the Compliment or Complaint

Please provide a clear description, including relevant dates, people involved, and the outcome you are seeking:

Confidentiality - We will treat your feedback confidentially and in accordance with our privacy obligations. If you have any concerns about confidentiality, please speak to the Community Manager

Signature and Date

Signature: _____ | Date: _____

Office Use Only (To be completed by the Community Operator)

Date Received: _____ Team Member Name: _____

Date Entered in to Register: _____