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COMPLAINTS POLICY - NEW ZEALAND

Superhero Securities Limited (FSP No. 1002150) (NZBN: 9429051299712) and Superhero Markets Pty Ltd (FSP No. 1002149) (NZBN: 9429051299729) (Together 'Superhero') registered as NZ Financial Service Providers ('FSP')

References to "Superhero", "we", "our", or "us" refer to the above entity.

Purpose

This Complaints Handling Policy (Policy) applies to the following entities:

- Superhero Securities Limited (FSP No. 1002150) (NZBN: 9429051299712); and
- Superhero Markets Pty Ltd (FSP No. 1002149) (NZBN: 9429051299729) (Together 'Superhero') registered as NZ Financial Service Providers ('FSP').

The purpose of this Policy is to provide you with key information about how Superhero will manage complaints from clients (you) about the financial products and services we provide. In this Policy, Superhero is also referred to as 'we', 'our' and 'us'. Where we have used a term in this Policy that is defined in the Companies Act 1993 that term will take the meaning given to it in that act unless otherwise stated.

This Policy sets out:

- information about who we are and the products and services we provide;
- our complaints management framework;
- how you may lodge a complaint with us;
- the options available to you if you need additional assistance to lodge a complaint;
- our key steps we follow for dealing with complaints, including acknowledgement, assessment and investigation, and provision of an IDR response;
- our response timeframes; and
- details about accessing the Financial Services Complaints Limited (FSCL) – A Financial Ombudsman Service where a complaint is not resolved within the required timeframe, or to your satisfaction.

This Policy is available in hard copy on request - you can request a copy at hello@superhero.co.nz or on our live chat function on our website: www.superhero.co.nz.

About us

Superhero's entities, Superhero Securities Limited (FSP No. 1002150) (NZBN: 9429051299712) and Superhero Markets Pty Ltd (FSP No. 1002149) (NZBN: 9429051299729) are registered as a New Zealand financial services providers.

Our complaints management framework

This Policy sets out how Superhero handles complaints, including the governance arrangements that apply to complaints handling and the procedures which assist us to respond to complaints quickly and effectively.

How you may lodge a complaint with us

What is a complaint?

A complaint is:

An expression of dissatisfaction made to a participant about their products or services, or the participant's internal complaints process itself, where a response or a resolution is explicitly or implicitly expected.

What does this mean for you?

If you are unhappy with any of our products or services, and you tell us about it, we will generally treat this as a complaint (e.g. where you are eligible to make a complaint and your enquiry meets the definition of a complaint).

If we do not think you are expecting a response from us and we are not otherwise obliged to give you a response, we may treat your enquiry as feedback instead of as a complaint and use it to help us improve our products and services. However, we will only do this if it is reasonably clear that your enquiry does not meet the definition of a 'complaint' set out above.

How do I complain?

You can complain to us at any time, and in any of the following ways. How you contact us is up to you. You can either:

- send us a letter to: Suite 13512, Level 1, 6 Johnsonville Road, Johnsonville, Wellington 6037, New Zealand;
- email us at complaints@superhero.co.nz;
- contact us via our social media sites; or
- use our live chat function on our website at www.superhero.co.nz.

Superhero does not operate a call centre. However, if you would like to be contacted by phone, please advise us of this via email or live chat and we will endeavour to assist you.

Posting on Social Media

We may treat posts on certain social media platforms as complaints. If you post on a platform that we own or control, a Superhero representative will acknowledge your complaint and may request you to provide us with further information via live chat or email, so that we can confirm your information and the details of your complaint in order to appropriately respond to you.

We will always respect your privacy while on social media. We will not ask you to make your personal information public.

What to do if you need assistance to make a complaint?

We know that accessing and understanding financial services can sometimes be difficult. If you think you may need assistance to lodge a complaint, please contact us via live chat or at hello@superhero.co.nz, and we will make arrangements to assist you with lodging your complaint.

What happens when you make a complaint?

This section summarises the key steps we follow when dealing with complaints, including acknowledgement, investigation, and provision of an Internal Dispute Resolution (IDR) response. We have also included our response timeframes in this section. The timeframes set out below will start to run when we receive a complaint that relates wholly or partly to our products or services.

Step One: We will acknowledge your complaint

We will confirm with you that we have received your complaint. Generally, we will acknowledge your complaint in writing, or we may acknowledge your complaint in the same way you contacted us to raise your complaint, unless you tell us otherwise.

We want to ensure that our complaints process is easy to navigate, so you can direct us as to how you want us to contact you about your complaint. Just let us know if you have a communication preference when you lodge your complaint or at any time during the complaints process.

Timeframe

We will acknowledge your complaint within 2 business days of receiving it, or as soon as practicable.

Step Two: We will investigate your complaint

We will make every effort to respond to you as quickly as we can and if possible, we will resolve your complaint on the spot. Where necessary, we will investigate any issues you have raised in your complaint and provide you with a formal IDR response. As part of our investigation we may contact you to request more information about your complaint or supporting materials.

Timeframes

For general complaints, we will respond to your complaint within 20 working days of the date the complaint was made.

Delays

We will always try to respond within the timeframes set out above. However, if your complaint is complex, or delayed by circumstances beyond our control, we may contact you within 20 working days to notify you that we will not be able to respond within the timeframe set out above.

If we contact you about a delay, we will also provide:

- the reasons for the delay;
- information about your right to complain to the Financial Services Complaints Limited (FSCL) – A Financial Ombudsman Service, if you are dissatisfied; and
- the contact details for FSCL.

Where a delay occurs we will respond to your complaint within 40 working days of the date the complaint was made.

Step Three: We will respond to your complaint.

When we respond to your complaint, we will generally provide you with a formal IDR response in writing. If we provide you with an IDR response it will include:

- the final outcome of your complaint at IDR;
- either:
 - confirmation of actions we have taken to fully resolve the complaint; or
 - our reasons for rejecting or partially rejecting your complaint;
- any additional information or context necessary for you to understand our IDR decision;
- information about your right to take your complaint to FSCL if you are not satisfied with our IDR response; and
- the contact details for FSCL.

Other Important Information

What does a complaint cost?

The entire Superhero IDR complaints process is free of charge.

Financial Services Complaints Limited (FSCL) – A Financial Ombudsman Service

If you are not satisfied with our IDR response, or we have not resolved your complaint within one of the required timeframes, you can lodge a complaint with FSCL. FSCL provides fair and independent external dispute resolution that is free to consumers.

If we have not had an opportunity to resolve your complaint first, FSCL may ask us to work with you to investigate and respond to your complaint before they commence their process.

FSCL's contact details are below:

Website: completing the on-line complaint form on FSCL's website www.fscl.org.nz

Telephone: 0800 347 257

Email: info@fscl.org.nz

In writing to: Financial Services Complaints Limited, PO Box 5967, Wellington 6140

Time limits apply to complain to FSCL so you should act promptly or otherwise consult the FSCL website to find out if or when the time limit relevant to your circumstances expires.

We're here to help

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For more information or help in relation to the above, feel free to contact us at hello@superhero.co.nz and we will endeavour to assist you in a timely manner.

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