

SURE CASH FINANCE

Shimtec Pty Ltd ABN 35 001 928 516 | t/as Sure Cash Finance
PO Box 310, Tweed Heads NSW 2485 | Phone: 1300 787 322 | ACL 390591

DISPUTE RESOLUTION POLICY

Version 2 | May 2026

Version	Date	Reviewed By	Summary of Changes
Version 1	July 2021	Compliance Manager	Initial version — drafted under RG 165 in anticipation of RG 271
Version 2	May 2026	Compliance Manager	Updated to operate fully under RG 271. Updated timeframes, added IDR data reporting, vulnerable customer provisions, social media complaints procedure, systemic issues process, expanded complaint form, updated contact details and address.

1. Purpose of Policy

- 1.1** This document sets out the policy and procedures for the handling of complaints received by Shimtec Pty Ltd ACN 001 928 516 trading as Sure Cash Finance ("Sure Cash") and the use of internal and external dispute resolution. It is intended to set out the internal dispute resolution (IDR) procedure in compliance with ASIC requirements.
- 1.2** This document is drawn in accordance with ASIC Regulatory Guide 271 — Internal Dispute Resolution (RG 271), which came into effect on 5 October 2021 and superseded Regulatory Guide 165. All references in this policy are to RG 271 unless otherwise stated. Regulatory Guides are available from the ASIC website at www.asic.gov.au.

2. Board Approval and Review

- 2.1** This policy was first approved by the Board on 1 July 2021 and updated to Version 2 in May 2026. The Board will, no less frequently than annually, review this policy, the Complaints Register, and training procedures, and will determine whether amendments are required based on information provided by the Complaints Officer.
- 2.2** This policy forms part of the Compliance Plan required by the National Consumer Credit Protection Act 2009 and the conditions of Sure Cash's Australian Credit Licence. It also forms part of the general operational requirements of the business.
- 2.3** Any material amendments to this policy must be approved by the Board and communicated to all relevant staff within 5 business days of approval.

3. ASIC Requirements

Section 47 of the National Consumer Credit Protection Act 2009 requires that the dispute resolution system must consist of:

- 3.1** An internal dispute resolution procedure that complies with standards made or approved by ASIC covering disputes in relation to credit activities in which Sure Cash or its representatives are engaged.
- 3.2** Membership of an external dispute resolution (EDR) scheme approved by ASIC.

- 3.3 Sure Cash is a member of the Australian Financial Complaints Authority (AFCA), the ASIC-approved EDR scheme.
- 3.4 Sure Cash is also required under RG 271 to report IDR data to ASIC annually. This obligation is addressed in Section 10 of this policy.

4. Policy Arrangement

This policy is divided into four parts:

- 4.1 Part One — General matters and the operation of the Internal Dispute Resolution process.
- 4.2 Part Two — Information document to be made available to customers.
- 4.3 Part Three — Complaint form to be used by complainants.
- 4.4 Part Four — Disputes Register template.

PART ONE — GENERAL MATTERS AND INTERNAL DISPUTE RESOLUTION PROCESS

5. What Is a Dispute?

- 5.1 The Credit Act refers to the necessity for credit providers to have processes for dealing with disputes. For the purposes of this policy, the words complaint and dispute are used interchangeably.
- 5.2 Sure Cash has adopted the definition of complaint from the Australian Standard ISO 10002-2018, as adopted by RG 271:

An expression of dissatisfaction made to an organisation, related to its products, services, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected.

- 5.3 For the purposes of this document, a dispute is considered to occur when a complaint from a customer has not been resolved to the customer's satisfaction.
- 5.4 In accordance with RG 271, a social media comment made by a consumer who is identifiable and contactable, expressing dissatisfaction with Sure Cash's products or services, will be treated as a complaint and handled in accordance with this policy. See Section 12 for the social media complaints procedure.

6. Commitment

- 6.1 Although Sure Cash aims to provide customers with the highest standards of products and service, there may be occasions when our service does not meet customer expectations. If such an event occurs, we are committed to dealing with any complaint or dispute in an efficient, effective, and fair manner, and ensuring that every complaint is recorded to assist customer service development and staff training.
- 6.2 Records of complaints and disputes will be reviewed regularly by management so that systemic problems can be identified and, where necessary, remedied. See Section 11 for the systemic issues process.

7. Guiding Principles

7.1 Provision of Information

- 7.1.1 Information about making complaints or disputes will be made freely available to consumers and will include: (a) how a complaint or dispute is to be lodged; (b) how the complaint or dispute will be dealt with by us; and (c) details of our external dispute resolution scheme (AFCA).

7.2 Accessibility

- 7.2.1** Complaints and disputes may be made in any reasonable manner. Sure Cash accepts complaints made by email, through our website (if any), letter, telephone, fax, or in person.
- 7.2.2** Sure Cash will provide a toll-free local call facility (1300 787 322) for reporting complaints and disputes.

7.3 Assistance

- 7.3.1** Where a complaint or dispute is made orally, the staff member taking the complaint will complete a complaint form on behalf of the complainant.
- 7.3.2** Staff will assist customers wishing to register a complaint or dispute.
- 7.3.3** Sure Cash will, where possible, provide multilingual assistance to customers with non-English-speaking backgrounds, including through the use of a translation service where necessary.
- 7.3.4** Additional assistance will be provided to vulnerable customers in accordance with Section 13 of this policy.

7.4 Response Timeframes

Key timeframes under RG 271:

Acknowledgement	Within 1 business day of receiving the complaint.
Resolution (standard)	Within 30 calendar days of receiving the complaint.
IDR delay notification	If resolution will exceed 30 days, written IDR delay notification must be sent to the complainant before day 30 expires.
Ongoing updates	If unresolved beyond 30 days, written updates must be provided at least monthly.

- 7.4.1** Sure Cash will acknowledge receipt of a complaint verbally or in writing within 1 business day of receiving it.
- 7.4.2** Every endeavour will be made to resolve a complaint immediately upon receipt. Where this is not possible, the complaint will be escalated to a more senior officer.
- 7.4.3** Where the complaint cannot be immediately resolved, Sure Cash will advise the customer in writing within 1 business day that the complaint has been received and the steps which will be undertaken to investigate and handle it.
- 7.4.4** Records of every step taken in response to a complaint or dispute will be maintained and reviewed by senior management regularly to ensure all necessary details are being recorded.
- 7.4.5** The investigating officer must aim to resolve complaints within 21 calendar days of receipt to allow sufficient time for an IDR response to be delivered within the 30-day maximum.
- 7.4.6** If it is not possible to make a decision within 30 calendar days, the investigating officer must send a written IDR delay notification to the complainant before day 30 expires. This notification must include: (a) the reason for the delay; (b) the right of the complainant to refer the matter to AFCA immediately if they are dissatisfied with the delay; and (c) AFCA's contact details.
- 7.4.7** Where a complaint or dispute remains unresolved beyond 30 days, written updates must be provided to the complainant at intervals of no less than monthly until the matter is resolved.
- 7.4.8** The only circumstances which may justify a delay beyond 30 days are: (a) where there has been no reasonable opportunity to provide a response; (b) where the matter is more complex than usual; or (c) circumstances beyond Sure Cash's control.
- 7.4.9** Upon resolution of a complaint or dispute, the investigating officer must ensure that any agreed action is implemented immediately.
- 7.4.10** The investigating officer must provide the complainant with a written IDR response that includes: (a) the outcome of the investigation and the reasons for it, including reference to relevant statutory or other provisions where appropriate; (b) details of any further steps the complainant can take, including AFCA contact details; and (c) where relevant, contact details for the Office of the Australian Information Commissioner (OAIC).

7.5 Fairness and Objectivity

- 7.5.1** All complaints and disputes will be dealt with in an equitable, objective, and unbiased manner. Sure Cash acknowledges the need to weigh the competing interests of the complainant, customers at large, and, where relevant, the staff member against whom the complaint was made.
- 7.5.2** The investigating officer will, wherever possible, be a person who was not involved in the matter giving rise to the complaint and who has sufficient seniority and authority to deal with the matter.

7.6 Charges

- 7.6.1** There will be no charge levied on the complainant for the determination of a complaint or dispute through the IDR process.
- 7.6.2** If there is a request by the complainant for the production or retrieval of documents, and if it is Sure Cash's usual practice to charge for such documents, the complainant may be asked to pay that fee.

7.7 Confidentiality

- 7.7.1** All complaints and disputes must be handled in a confidential manner. Except where necessary for the determination of the dispute, confidential information including personally identifiable information will not be disclosed.

8. Staff

- 8.1** A Complaints Officer will be appointed. The Complaints Officer is responsible for ensuring all complaints and disputes are handled in accordance with this policy. Current contact details for the Complaints Officer are:

Name	Paul Shimmins
Title	Responsible Manager
Phone	1300 787 322
Email	complaints@surecash.com.au
Address	PO Box 310, Tweed Heads NSW 2485

- 8.2** Each staff member has the responsibility of attempting to resolve all complaints or disputes as soon as they are made or registered.
- 8.3** All complaints or disputes, whether resolved or not, must be reviewed by the manager of the staff member who originally dealt with the matter. The manager will determine whether the matter should be referred to the Complaints Officer.
- 8.4** The Complaints Officer will report to the Board no less frequently than twice in each calendar year on the handling and progress of complaints and disputes, including any systemic issues identified.
- 8.5** All staff will be provided with a copy of, or access to, this policy. Awareness of the dispute resolution policy is a condition of commencement of employment. Staff will be trained in completing the complaint form and recognising matters requiring priority handling.

8.6 Authority to Settle

- 8.6.1** All staff have the authority to resolve any complaint or dispute that does not involve an alteration to the amount owing by a customer. Examples include: providing an apology; agreeing to send a document or letter; or escalating a matter to senior management.
- 8.6.2** Other than the Complaints Officer, a director, or the general manager (or a person specifically authorised by them), no staff member has the authority to resolve any complaint or dispute that involves an adjustment to a customer's loan account or a payment to a customer.
- 8.6.3** The Complaints Officer has authority to resolve complaints involving payment by account adjustment up to \$1,000.
- 8.6.4** Settlement of complaints involving an amount greater than \$1,000, or where a cash refund is required, must be approved by a director or the general manager.

9. Disputes Register

- 9.1 A Disputes Register will be maintained by Sure Cash to record and track all complaints and disputes not resolved to the customer's satisfaction within 24 hours of lodging.
- 9.2 The Complaints Officer is responsible for ensuring the Disputes Register is properly maintained.
- 9.3 The Register must contain the following information for each complaint or dispute:

Index Number	Unique identifier for the complaint.
Date Received	The date the complaint was notified to Sure Cash.
Complainant Name	Full name of the complainant.
Account / Loan Number	Relevant account or loan number.
Complaint Details	Description of the complaint or dispute.
Category	Category of the complaint (see Section 11).
Date Acknowledged	Date the complaint was acknowledged to the customer.
Responsible Officer	Person responsible for managing the complaint.
Action Taken	Steps taken to investigate and resolve the complaint.
IDR Delay Notification	Whether an IDR delay notification was sent and the date.
Resolution / Terms	Terms of resolution if resolved.
Date Resolved	Date the complaint was resolved.
AFCA Referral	Whether the matter was referred to AFCA.

- 9.4 The Disputes Register will be reviewed by the Board no less frequently than twice in each calendar year.
- 9.5 The Complaints Officer will ensure all complaints are categorised correctly to enable identification of systemic issues.
- 9.6 The Register will be made available to members of the Board, senior management, and, where authorised or required by law, ASIC and other relevant regulatory authorities.
- 9.7 The Complaints Officer will ensure that sufficient documentation is retained to enable adequate review. All records must be retained for a minimum of 7 years.
- 9.8 All information on the Register must be maintained in strict confidence and not disclosed to others except to AFCA, ASIC, or other regulatory authorities as required.

10. ASIC IDR Data Reporting

- 10.1 Under RG 271, Sure Cash is required to report IDR data to ASIC annually via the ASIC Regulatory Portal. This obligation applies to all complaints received on or after 5 October 2021.
- 10.2 The Complaints Officer is responsible for compiling and submitting IDR data to ASIC within the timeframes specified by ASIC from time to time.
- 10.3 IDR data reported to ASIC must include at a minimum:
 - Total number of complaints received during the reporting period.
 - Number of complaints resolved within 30 calendar days.
 - Number of complaints exceeding 30 calendar days.
 - Number of IDR delay notifications issued.
 - Categories of complaints received.
 - Number of complaints referred to AFCA.

- 10.4 The Complaints Officer must ensure all data recorded in the Disputes Register is accurate and sufficient to meet ASIC IDR reporting requirements.
- 10.5 ASIC IDR reporting obligations and deadlines will be monitored by the Compliance Manager and reported to the Board annually.

11. Systemic Issues

- 11.1 The Complaints Officer must monitor the Disputes Register for patterns of complaints that may indicate a systemic issue with Sure Cash's products, services, or processes.
- 11.2 A systemic issue is considered to exist where:
 - Three or more complaints of a similar nature are received within any rolling 3-month period.
 - A single complaint reveals a process failure or deficiency that is likely to have affected or may affect other customers.
 - A complaint reveals a potential breach of Sure Cash's credit licence obligations or applicable legislation.
- 11.3 Upon identification of a potential systemic issue, the Complaints Officer must:
 - Immediately escalate the matter to the Compliance Manager and a director.
 - Document the issue and the steps being taken to investigate and remedy it.
 - Report the matter to the Board at the next available Board meeting, or immediately if the issue is material.
- 11.4 Where a systemic issue is confirmed, Sure Cash must consider whether affected customers who did not complain should be proactively contacted and offered a remedy.
- 11.5 All systemic issues identified and the steps taken to resolve them must be documented and retained for a minimum of 7 years.
- 11.6 The Complaints Officer will include a summary of systemic issues identified in the twice-yearly Board report.

12. Social Media Complaints

- 12.1 In accordance with RG 271, Sure Cash treats any social media comment made by an identifiable and contactable consumer expressing dissatisfaction with Sure Cash's products or services as a complaint.
- 12.2 The following procedure applies to social media complaints:

Monitoring	A nominated staff member is responsible for monitoring Sure Cash's social media accounts (if any) for complaints on each business day.
Identification	Where a comment is identified that constitutes a complaint, the staff member must record it in the Disputes Register within 1 business day of identification.
Initial Response	A public acknowledgement must be posted within 1 business day advising the complainant that Sure Cash has noted their concern and will be in contact directly.
Private Channel	The complaint must then be moved to a private communication channel (email, phone, or direct message) as soon as possible to allow for proper investigation and resolution.
Resolution	The complaint is then handled in accordance with the standard IDR process including all timeframes in Section 7.4.
Responsible Officer	The Complaints Officer is responsible for oversight of all social media complaints.

- 12.3** Staff must not make any public statement on social media regarding the substance of a complaint, any admission of liability, or any details of a proposed resolution without prior approval from the Complaints Officer or a director.
- 12.4** All social media complaints must be captured in the Disputes Register and included in ASIC IDR data reporting.

13. Vulnerable Customers

- 13.1** Sure Cash recognises that some customers may face additional barriers to making or pursuing a complaint due to personal vulnerability. This section applies additional care to customers who may be experiencing:
 - Domestic and family violence.
 - Mental health difficulties.
 - Elder financial abuse.
 - Cognitive impairment or disability.
 - Literacy or language barriers.
 - Grief or bereavement.
- 13.2** Staff must treat all customers with sensitivity and must not require a vulnerable customer to repeatedly explain their circumstances where doing so may cause distress.
- 13.3** Where vulnerability is identified or disclosed, staff must:
 - Offer flexible communication options (e.g. allowing a support person to assist).
 - Allow additional time for the customer to provide information or respond.
 - Prioritise the complaint where the customer's circumstances indicate urgency.
 - Refer the customer to appropriate support services where relevant.
- 13.4** A vulnerable customer may nominate an authorised representative (such as a financial counsellor, legal aid representative, or family member) to act on their behalf in relation to a complaint. Sure Cash will accept instructions from such a representative once appropriate authority is confirmed.
- 13.5** Where domestic or family violence is disclosed or suspected, staff must not contact the customer through any channel that may be monitored by a third party without the customer's explicit permission.
- 13.6** Relevant referral services include:

National Debt Helpline	1800 007 007 www.ndh.org.au
1800RESPECT	1800 737 732 www.1800respect.org.au
MoneySmart (ASIC)	www.moneysmart.gov.au
Legal Aid	Contact relevant state Legal Aid commission
Lifeline	13 11 14 www.lifeline.org.au

14. Remedies to be Considered

- 14.1** All complaints or disputes will be determined on the facts. Relevant staff must consider the following possible remedies, or any combination of them:
 - Apology (verbal, written, or both).
 - Refund.
 - Compensation (by credit to account, refund, or other agreed remedy).
 - Waiver of fees or charges.
 - Correcting inaccurate information.

- Staff training.
- Review and amendment of internal procedures.

14.2 Where the remedy involves staff training or review of internal procedures, the Complaints Officer will ensure that appropriate action is taken and documented.

15. Correction of Personal Information

- 15.1** Sure Cash acknowledges its obligation under the Privacy Act 1988 (Cth) to deal with requests for correction of personal information (including credit information) made by individuals.
- 15.2** Where an individual requests correction of personal information held by Sure Cash, Sure Cash will consider the request. If the information is determined to be inaccurate, out of date, incomplete, irrelevant, or misleading, Sure Cash will take such reasonable steps as are necessary to correct the information within 30 days of the request (or such longer period as is agreed in writing with the individual).
- 15.3** If an extension beyond 30 days is required, Sure Cash must notify the individual in writing before the 30-day period expires, setting out the reason for the extension and the expected completion date.
- 15.4** Where the information is held by a third party (such as a credit reporting body or another credit provider), the request for correction must be brought to the attention of that body.
- 15.5** If information is corrected, a written notice of the correction will be given within a reasonable time to: (a) the individual; (b) any entity consulted in the correction process; and (c) any entity to which the incorrect information was previously provided.
- 15.6** No charge will be made for dealing with correction requests.

16. Policy Review

- 16.1** This policy will be reviewed at least annually by the Compliance Manager who will report to the Board on any recommended changes arising from changes to legislation or ASIC guidance, AFCA determinations, internal compliance monitoring, or changes to Sure Cash's business.
- 16.2** Any material amendments must be approved by the Board and communicated to all relevant staff within 5 business days.

PART TWO — INFORMATION FOR CUSTOMERS

COMPLAINTS AND DISPUTE RESOLUTION — INFORMATION FOR CUSTOMERS

Although we aim to provide you with the highest standards of products and service, there may be occasions when our service does not meet your expectations. If such an event occurs, we are committed to dealing with any complaint or dispute efficiently, effectively, and fairly — at no cost to you.

This document explains how to make a complaint and what will happen next.

Step 1 — Contact Us

Tell us about your complaint as soon as possible. You can contact us by:

- Phone: 1300 787 322
- Email: complaints@surecash.com.au
- Post: PO Box 310, Tweed Heads NSW 2485
- In person at our office
- Social media (a message on our social media page will be treated as a complaint)

We will try to resolve your complaint immediately. If we cannot, we will refer it to a more senior person.

Step 2 — We Will Acknowledge Your Complaint

We will acknowledge your complaint within 1 business day of receiving it. We will also let you know how we intend to investigate it.

Step 3 — We Will Investigate

Your complaint will be investigated by our Complaints Officer who can be contacted as follows:

Name	Paul Shimmins
Phone	1300 787 322
Email	complaints@surecash.com.au
Post	PO Box 310, Tweed Heads NSW 2485

We aim to resolve all complaints within 30 calendar days. If we need more time, we will write to you before day 30 to explain the reason for the delay and advise you of your right to contact AFCA if you are dissatisfied.

Step 4 — We Will Give You an Outcome

We will provide you with a written response setting out the outcome and the reasons for our decision. If you are not satisfied with our response, you can take the matter further.

Step 5 — External Dispute Resolution

If you are not satisfied with our response, you can refer your complaint to the Australian Financial Complaints Authority (AFCA) — a free and independent dispute resolution service approved by ASIC.

AFCA Phone	1800 931 678 (free call)
AFCA Email	info@afca.org.au
AFCA Website	www.afca.org.au
AFCA Post	GPO Box 3, Melbourne VIC 3001
Online Form	www.afca.org.au/make-a-complaint

If your complaint relates to privacy, you may also contact the Office of the Australian Information Commissioner (OAIC):

OAIC Phone	1300 363 992
OAIC Email	enquiries@oaic.gov.au
OAIC Website	www.oaic.gov.au
OAIC Post	GPO Box 5218, Sydney NSW 2001

There is no charge to you for lodging a complaint with us, AFCA, or the OAIC.

PART THREE — COMPLAINT FORM

SURE CASH FINANCE — COMPLAINT FORM

Shimtec Pty Ltd t/as Sure Cash Finance | PO Box 310, Tweed Heads NSW 2485 | Phone: 1300 787 322

Supporting Documents Attached:

Yes — please list: _____ No

_____ *Complainant Signature*

_____ *Date*

Your rights:

You have the right to refer this complaint to the Australian Financial Complaints Authority (AFCA) — a free and independent service — if you are not satisfied with our response. AFCA: 1800 931 678 | www.afca.org.au

OFFICE USE ONLY

Complaint Index Number	
Date Received	
Received By	
Date Acknowledged	
Investigating Officer	
Target Resolution Date	
Date Resolved	
Outcome	

PART FOUR — DISPUTES REGISTER TEMPLATE

The Disputes Register must be maintained in this format (or equivalent). All fields must be completed for each complaint.

Index No.	Date Received	Complainant	Loan No.	Category	Date Resolved	Outcome / AFCA Referral
001						
002						
003						

Complaint Categories: Fees/Charges | Loan Terms | Customer Service | Privacy | Hardship | Credit Reporting | Delay | Other

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