

Complaints Policy

AUSTRALIA



INVESTOR SERVICES

COMPLAINTS POLICY

Purpose and scope of this Policy

This policy has been written so it aligns itself with the complaints handling framework prescribed by the Constitutions of the Trusts managed by ING Management Limited ('Responsible Entity'), the Corporations Act 2001 and the guidelines set out in the Australian Standard AS4269-1995 Complaints Handling.

In all cases, the Responsible Entity will endeavour to resolve any complaint received within 48 hours. In the event that this standard is not achieved an explanation will be placed on file explaining why this standard cannot be achieved and the Unitholder will be fully informed as to the status of the complaint and expected timeframe for resolution.

Definition of a Complaint

Australian Standard Complaints Handling defines a complaint as "any expression of dissatisfaction with a product or service offered or provided". Common examples of complaints that may be received by the Responsible Entity include:

- not receiving a distribution cheque on time;
- not being notified of suspension of distribution or distribution reinvestment plan appropriately;
- not having a change of investor details recorded correctly

Principal procedures for making a complaint

Unitholders wishing to complain must direct their complaint in the first instance to the Investor Services Manager of the Responsible Entity, who has been appointed as the principal point of contact for dealing with Investor Complaints and may be contactable as follows:

Investor Services Manager

C/- ING Management Limited
Level 6, 345 George Street
Sydney NSW 2000
Phone: (02) 9033 1035
Email: realestate@ingrealestate.com

The Responsible Entity has also appointed Link Market Services Limited ("Registry") to provide registry services to the Trusts or Schemes managed by the Responsible Entity and to act as the main point of contact for investors to make inquiries in respect of the Trusts managed by the Responsible Entity. Any complaints received via the Registry will be forwarded to the Investor Services Officer for resolution.

GUIDELINES FOR DEALING WITH COMPLAINTS

The Responsible Entity has put in place the following guidelines for dealing with complaints from Unitholder.

Further details regarding these guidelines are provided below:

1. The Responsible Entity may receive a complaint from Unitholder in a variety of different forms including telephone, facsimile, in writing or by email. The Responsible Entity will attempt to resolve all complaints within 48 hours of the Complaint being received.
2. In the event, the Unit holder's complaint is not resolved within 48 hours, the Responsible Entity will:
 - a) acknowledge receipt of the complaint within 48 hours;
 - b) advise the Unitholder why this complaint will not be able to be resolved within 48 hours and in doing so, provide details of steps that need to be taken to resolve the complaint; and
 - c) inform the Unitholder on an expected timeframe for resolution and keep the Unitholder updated on developments relating to the complaint at all times
3. In responding to the unit holder's complaint, the Responsible Entity will need to make reference to the steps taken to resolve the complaint and if the Unitholder is not satisfied with the action taken, provide them with details of a further avenue or remedies that they may take to resolve the complaint.

That is, in accordance with 3 above, all responses to complaints in writing must contain the following paragraph:

“ING Management Limited (Responsible Entity for several listed and unlisted Funds) is required by law to be a member of an independent resolution scheme, namely the Financial Ombudsman Service (“FOS”). If you feel your complaint remains unresolved or you wish FOS to further investigate your complaint, you can contact FOS as detailed below.

By telephone: 1300 78 08 08

In writing: Financial Ombudsman Service
GPO Box 3Melbourne VIC 3007

By email: info@fos.org.au

Website: www.fos.org.au

4. The Responsible Entity will maintain a register of all complaints received. This register will provide details of:

- date the complaint was received and ultimately resolved;
- who the complaint was from (including HIN & SRN details);
- nature of complaint; and
- action taken to resolve the complaint

It is the responsibility of the Investor Services Manager to maintain this register and forward a copy of the register to the Compliance Manager monthly.