



A.P.V.C. Limited ACN 093 228 141
(“Responsible Entity”)

Internal Complaints Handling Policy & Procedure Manual

Issued by: John Osborne, Chief Executive Officer

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Complaints Handling Policy & Procedures Manual Version 6

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COMPLAINTS HANDLING POLICY & PROCEDURES MANUAL

It is a legislative requirement that a company has an acceptable internal dispute resolution (IDR) process and external dispute resolution (EDR) process.

1.1 SUMMARY

Under subparagraph 912A(2)(a)(i) of the Corporations Act and Regulation 7.6.02 of the Corporations Regulations A.P.V.C. Limited is required as an AFS licensee to have internal complaints handling procedures which comply with Australian Standard ISO 10002:2006 Complaints Handling.

1.2 OBJECTIVE OF THIS INTERNAL POLICY

To ensure that Member and general complaints are resolved in an effective and professional manner, both in accordance with our regulatory requirements and to minimise customer dissatisfaction.

The purpose of this policy is to provide assistance to Accor Vacation Club staff in dealing with client complaints in accordance with the Australian Standard as well as informing customers of the procedures taken in complaint resolution.

As outlined in the Australian Standard; our Complaints Handling Policy needs to address the following principles:-

1.2.1 Commitment

We are committed to effective and fair resolution of complaints by people in the organisation at all levels, including top level management. We acknowledge consumers' rights to complain and actively solicit feedback from consumers.

1.2.2 Fairness

We recognise the need to be fair and without bias to both the complainant, and to persons within Accor Vacation Club against whom the complaint is made, or are otherwise directly affected by the outcome of the complaint. Complaints against personnel will be handled by an independent person. The outcome of a complaint will wherever possible be provided in writing with reference to applicable disclosure or legislation.

1.2.3 Resources

We will seek to ensure we have adequate resources for complaints handling with sufficient levels of delegated authority. We further need to ensure that complaints will be reviewed by someone in an independent position (i.e. someone who was not involved in the matter complained about). Where possible we will provide national and international toll free telephone numbers as well as a dedicated email address.

1.2.4 Visibility

Our complaints handling Policy and Procedures will be readily available on request. We aim to ensure information about our processes are generally accessible on request but ultimately by being available on our corporate website (www.accorvacationclub.com.au) for complainants to access, and on our intranet for staff to access. It is currently accessible by request only.

1.2.5 Access

Our complaints handling process ensures that information is readily available on the details of making and resolving complaints. The complaints handling process and supporting information is easy to understand and is in plain language.

1.2.6 Assistance

We will offer assistance to complainants in the formulation and lodgement of complaints where required. Accor Vacation Club provides standard complaint forms in electronic or paper format on request.

1.2.7 Responsiveness

Complaints shall be dealt with quickly in compliance with our statutory requirements. We shall promptly acknowledge receiving a complaint and will endeavour to ensure that a response is sent within 45 days. If this is not possible, once identified we will notify the complainant of the delay. For matters relating to the business of A.P.V.C. Limited, if applicable their option to refer the matter to an EDR shall also be provided.

1.2.8 Charges

There will be no charge to a complainant wishing to lodge a complaint or obtain details of this ICHP.

1.2.9 Remedies

Our Complaints Handling Policy has the capacity to determine and implement remedies to the limit of authority of the individual staff member.

1.2.10 Data Collection

Complaints and outcomes will be recorded in our Complaints Register and will be subject to regular analysis and reporting

1.2.11 Systemic and Recurring Problems

Complaints shall be classified and analysed for the identification and rectification of systemic and recurring problems.

1.2.12 Accountability

We will have appropriate reporting on the operation of the complaints handling process

1.2.13 Reviews

Our Complaints Handling Policy is reviewed at least annually commencing August 2005.

Note date tracking and review dates on the front of this policy document.

1.2.14 Confidentiality

Where possible the identity of a complainant will be kept confidential

2. Defining a Complaint

Enquiry/Concern/Feedback: Any request from a Member or customer of Accor Vacation Club seeking information, providing feedback and/or clarification about any good or service provided by Accor Vacation Club or an action or procedure Accor Vacation Club has undertaken or may reasonably be expected to undertake.

If a matter can be addressed at this stage it is not considered a complaint.

Complaint: Any expression of dissatisfaction that relates to the quality of a product or service provided which the Company should have known was not satisfactory. A Complaint includes an expression of dissatisfaction whether received from a Club Member or any person with whom Accor Vacation Club has had contact. A Complaint can be received directly from the person indicating dissatisfaction or indirectly, as a result of issues referred by a third party, including but not limited to regulatory agencies or consumer tribunals. In the latter case, we will treat a matter as a Complaint as long as we can identify adequate particulars of conduct being alleged against Accor Vacation Club notwithstanding that we may not always be aware of the identity of the Complainant.

Referral of enquiry/feedback or concern to Internal Dispute Resolution: If an adverse decision is communicated to a client, the client should be informed of the IDR process. They should also be advised that if they wish their complaint to be considered under the IDR process, they should put their complaint in writing clearly stating their concerns and what they consider an acceptable resolution. Correspondence should be addressed to the Customer Service and Complaints Department

Dispute: A pursued unsatisfied complaint (as defined in ISO 10002:2006).

Who receives complaints?

- Member Relations department
- Departmental Managers
- Complaints Resolution Officers
- Customer Service staff
- Sales Managers

Who investigates complaints?

- Customer Service Manager
- Legal & Compliance Coordinators
- Member Relations Department
- Other Members of the Legal & Compliance team from time to time

Types of Complaints:

- | | |
|-------------------------------------|--|
| - Dissatisfaction with the Club | - a related company acting as third party service provider to the RE |
| - Misrepresentation by any employee | |
| - Lack of service | - Vacation Plus Holiday packages |
| - Privacy Issues | - Call Centre concerns |
| - Qualification Concerns | - Treatment by sales staff concerns |
| - Escape Voucher Redemption | - financial loss as a result of a failure on the part of Accor Vacation Club |
| - Availability concerns | |

3. Receiving a Complaint

Complaints defined under item 2 above are to be recorded as outlined in this Policy.

It is preferable that complaints of this nature are received in writing (including email, facsimile and letter). Verbal complaints will be accepted under this policy.

As a general rule, all complaints / grievances should be dealt with in a manner using the following acronym as a procedural guide:

- A** Answer each call in a positive way
- L** Listen to what the client is saying
- E** Empathise with what they are saying (but do not admit liability)
- R** Repeat / reinforce your understanding of the situation
- R** Resolution (attempt to offer a resolution to the situation BUT within guidelines)
- T** Terminate the call in a positive manner

3.1 Written Complaints

Template complaint forms are available on request

The written complaint should clearly state:

- The exact dissatisfaction with the product / service; and
- Any financial loss incurred.
- The corrective action required to resolve the matter

This letter should be addressed to complaintresolution@accorvacationclub.com.au or;

Customer Service & Complaints
Accor Vacation Club
P.O. Box 3755
Robina Town Centre QLD 4230

3.2 Verbal Complaints

Where possible it is desirable that complaints are submitted in writing by the complainant. Should the complainant not wish to comply with this request, then the Complainant should be advised that Accor Vacation Club seeks to follow a formal prescribed complaints resolution procedure whereby a designated Complaint investigator is required to record and attempt resolution of the Complaint.

The Complainant needs to be advised of the identity and contact particulars for the Complaints Department. A telephone note needs to be taken (preferably by internal e-mail and forwarded to complaintresolution@accorvacationclub.com.au documenting the date and time of the contact with the Complainant and recording that the Complainant was referred to the Complaints Department.

Notwithstanding the manner in which a complaint is received, the appointed investigator should apply the following procedure when dealing with verbal complaints:-

- Identify oneself, listen, record details and determine what the complainant wants.
- Confirm the details received.
- Attempt to empathise with the complainant in a courteous manner.

- Explain the courses of action available.
- Do not admit liability.
- Do not attempt to lay blame or to be defensive.
- Attempt to resolve the complaint if possible within authorised limits.
- Ensure that the complainant is informed the complaint is receiving attention, without creating false expectations.
- Always compile a file note of the conversation recording date, time and particulars of the conversation.
- Check whether the complainant is satisfied with the proposed action and, if not, advise alternative courses of action.

4. Recording a Complaint

- 4.1. It is the responsibility of any staff member who receives a complaint to forward the complaint to the Customer Service and Complaints Department who must enter the complaint into the Complaints Register.

The Complaints Register tracks the status of all complaints. The Complaints Register is located within g:\complaints\secure\data\members (year) and g:\complaints\secure\data\non members (year). The complaints register records the following information:

- Internal Complaint Number
 - Date of receipt of complaint
 - Name of complainant
 - Confirmation that a complaint is acknowledged
 - Brief description of Complaint
 - Details relevant to identifying the complainant on company records
 - Accor Vacation Club staff involved (if sales related attempt to identify sales executive)
 - Details of internal and external communication
 - Action taken: *(Including remedies / determinations / result)*
 - When applicable confirmation that details of the ECR company was provided
 - Date of finalisation of complaint
- 4.2. Original documentation must be kept on file by the appointed Complaints Resolution Officer.
- 4.3. The appointed Complaints investigator must send a written acknowledgement of receipt of promptly but no later than 5 business days from receipt. Complaints forwarded to the email box complaintresolution@accorvacationclub.com.au will receive an automatically generated reply confirming the receipt of the complaint as well as the timeframe with which to expect a reply.

5. Complaints Department

5.1 Responsibilities of Complaint Officers

The appointed Complaints officer must promptly send a letter to the complainant assuring earliest attention, and that an investigation is underway.

5.2 The complaint aims to be resolved within 45 calendar days.

5.3 Where the complaint is unlikely to be resolved within 45 calendar days, the Complaints officer must promptly contact the complainant to request additional time and explain the delay. In any event, the complaint must be resolved no later than 90 days from the date of receipt of the complaint.

5.4 The complainant must be informed of the criteria and process, including the avenues for further review, applied by Accor Vacation Club in dealing with complaints. Explain their rights to them and be patient and courteous.

5.5. Ensure that the complainant is familiar with the complaints procedure. The complainant is entitled to receive a copy of our complaints handling procedure should they request it or if they are unfamiliar with the process.

5.6 The complainant must be advised that they have a right to be heard and supply material in support of their complaint, if they desire.

5.7 A complaint file must be opened for each complaint received and must contain at least the following information:

- A summary of the complaint extracted from the complaints register;
- Copies of background data eg, application for membership, member's acknowledgment, record of Club usage or attempted usage all correspondence and transaction listings;
- File notes of telephone discussions with the complainant or interviews with relevant staff;
- Copies of all correspondence sent to the client in relation to the complaint; and
- Action plan to resolve the complaint.

5.8 The appointed Complaints officer must contact the relevant employees or their supervisor, and discuss and request a report from each one in relation to the subject matter of the complaint.

5.9 Where possible, complaints should be reviewed by someone in an independent position (eg. someone who was not involved in the matter complained about). Ideally, if the complaint indicates a concern that relates to the legal compliance by A.P.V.C. Limited with its Australian Financial Services License or its Compliance Plan, the person to independently review the complaint should be the Customer Service Manager (or Manager – Member Relations), due to the technical nature of the advice provided.

5.10 When providing a written response to the complainant, the appointed Complaints officer must include the following information:

- A summary of issues raised in the initial complaint;

- Reason for the decision; and
 - Advise the client that if they are not satisfied with the outcome of their complaint, they may readdress the issues with Accor Vacation Club and request a further review or consideration;
 - For applicable complaints, information on a complainant's right to refer their complaint to the EDRS, currently operated by the Financial Ombudsman Service of which A.P.V.C. Limited is a member.
- 5.11 It is the responsibility of the Complaints Officer to report the dispute to the Customer Service Manager (or Manager – Member Relations) if appropriate due to any likelihood that the complaint relates to issues of compliance by A.P.V.C. Limited with its Australian Financial Services License or its Compliance Plan.
- 5.12. It is the responsibility of the Customer Service Manager to ensure that the membership of the external dispute resolution scheme is maintained and current.
- 5.13 The Customer Service Manager (& Manager – Member Relations) will review the Complaints Register regularly for the purpose of providing analysis to the Compliance Manager, and top management on systemic and recurring problems. This analysis will assist the company in determining the cause of complaints and whether remedial action is warranted. As stated in ISO 10002:2006 (Clause 3.2) the aggregated data can be used to:
- (a) Redesign products and services
 - (b) Change organisational practices and procedures
 - (c) Retrain staff on product and service delivery
 - (d) Re-assess consumer information needs; eg labelling / instructions
 - (e) Assess the performance of after-sales service
 - (f) Give early warning about potential product and service defects.

6. Complaints Register

The Complaints Officers are responsible for logging a complaint into the Complaints Register.

6.1 Maintenance

The Complaints investigator must maintain the Complaints Register.

Complaints must be kept on the register for 7 years. Every Complaint must be recorded in the Complaints Register.

6.2 Information to be recorded in the Complaints Register

The following information must be recorded:

- Name of the Complainant;
- Date complaint received and manner in which complaint was received
- Confirmation that the complaint has been acknowledged
- Details necessary to locate the complainant on company records
- Brief summary of material aspects of the complaint;

- Adviser/department involved;
- Details of the internal and external communication
- Proposed / final course of action.
- Resolution achieved
- Date the complaint was finalised
- When applicable, confirmation that details of the EDRS were provided

7. Remedies for Resolving Disputes

Possible remedies for resolving disputes include:

- Apology;
- Refunds
- Compensation
- Provision of free services;
- Disciplinary action against staff member; and
- Technical Assistance
- Additional information
- Goodwill gift or token
- Financial compensation including total or partial refund of monies paid;
- Other assistance

The Complaints officer is authorised to resolve complaints by approving remedies not to exceed the expenditure of AUD\$250 in value.

To obtain authorisation for resolution outside this limit, the Complaints officer must first determine a recommended outcome and seek the approval the Customer Service Manager (or Manager – Member Relations).

For amounts exceeding \$3,000, the Customer Service Manager (or Manager – Member Relations) must first determine a recommended outcome and seek to obtain the written approval from the General Counsel, Chief Financial Officer (CFO) or Chief Executive Officer (CEO) before proceeding further to notify the complainant of the proposed outcome.

8. External Dispute Resolution Scheme

A.P.V.C. Limited currently holds membership number C-3390 with the Financial Ombudsman Service (“FOS”) an external complaints resolution scheme approved by ASIC under ASIC Policy Statement 139 to handle complaints arising out of the AFS licensed activities of A.P.V.C. Limited.

The commencement date of that membership was 24 March 2003. Unless Accor Vacation Club obtains membership of an alternative similarly approved external complaints resolution scheme, the Customer Service Manager (or Manager – Member Relations) must ensure that annual renewal of FOS membership on or before the 24th day of March each year.

COMPLAINTS HANDLING POLICY & PROCEDURES MANUAL
Appendix I - Complaints Entry Form



MEMBERS
INDIVIDUAL COMPLAINT SUMMARY

Complainant
Complaint No.
Complaint Issues:

Member Number:
Date Received:
Acknowledged: Yes/No
Member Status:
Represented by:

Details of Complaint

Sales Date
Sales Deck

Sales Executive:
Assistant Sales Manager:
Owner Relations Manager:

Investigation Notes

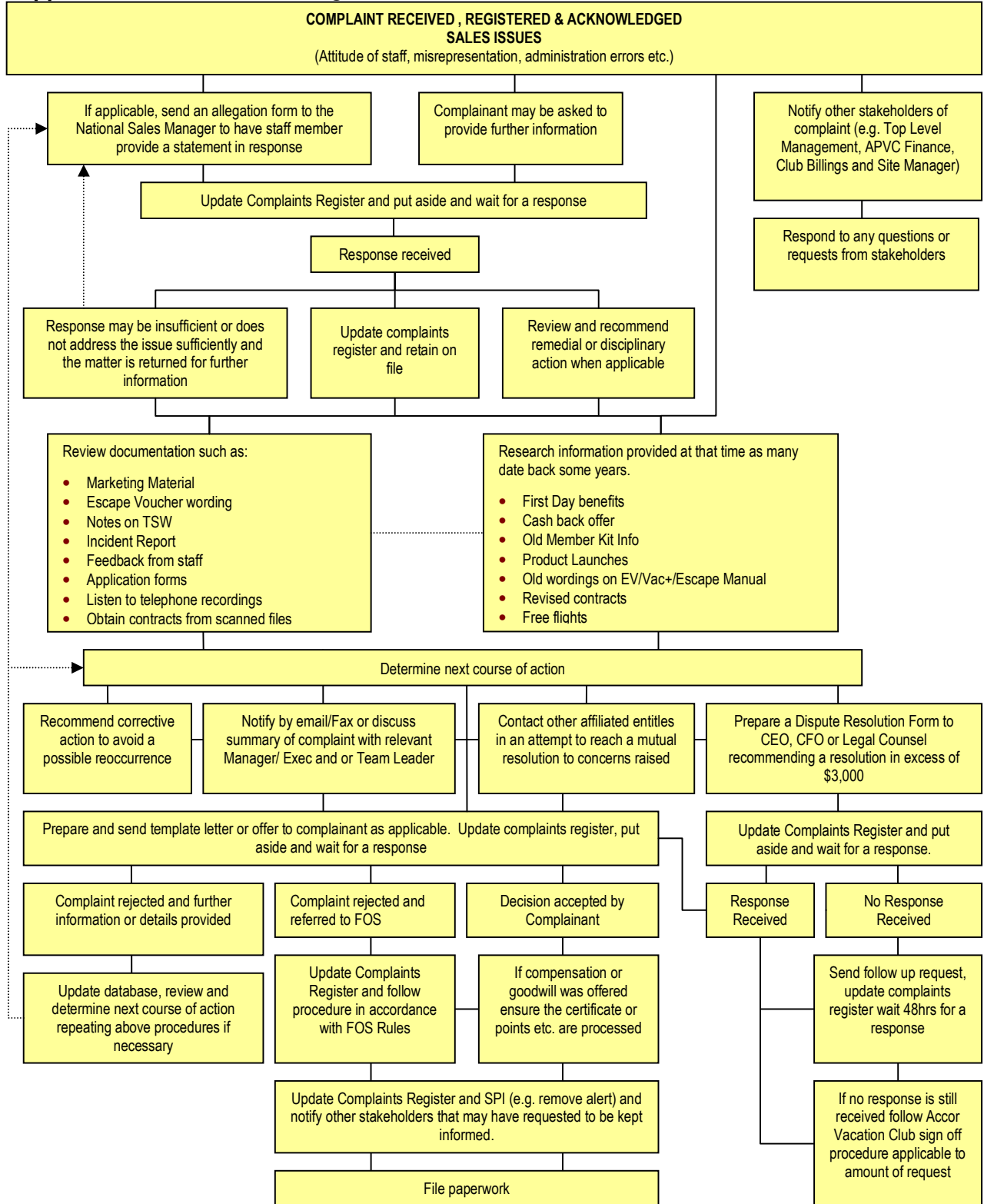
Resolution:

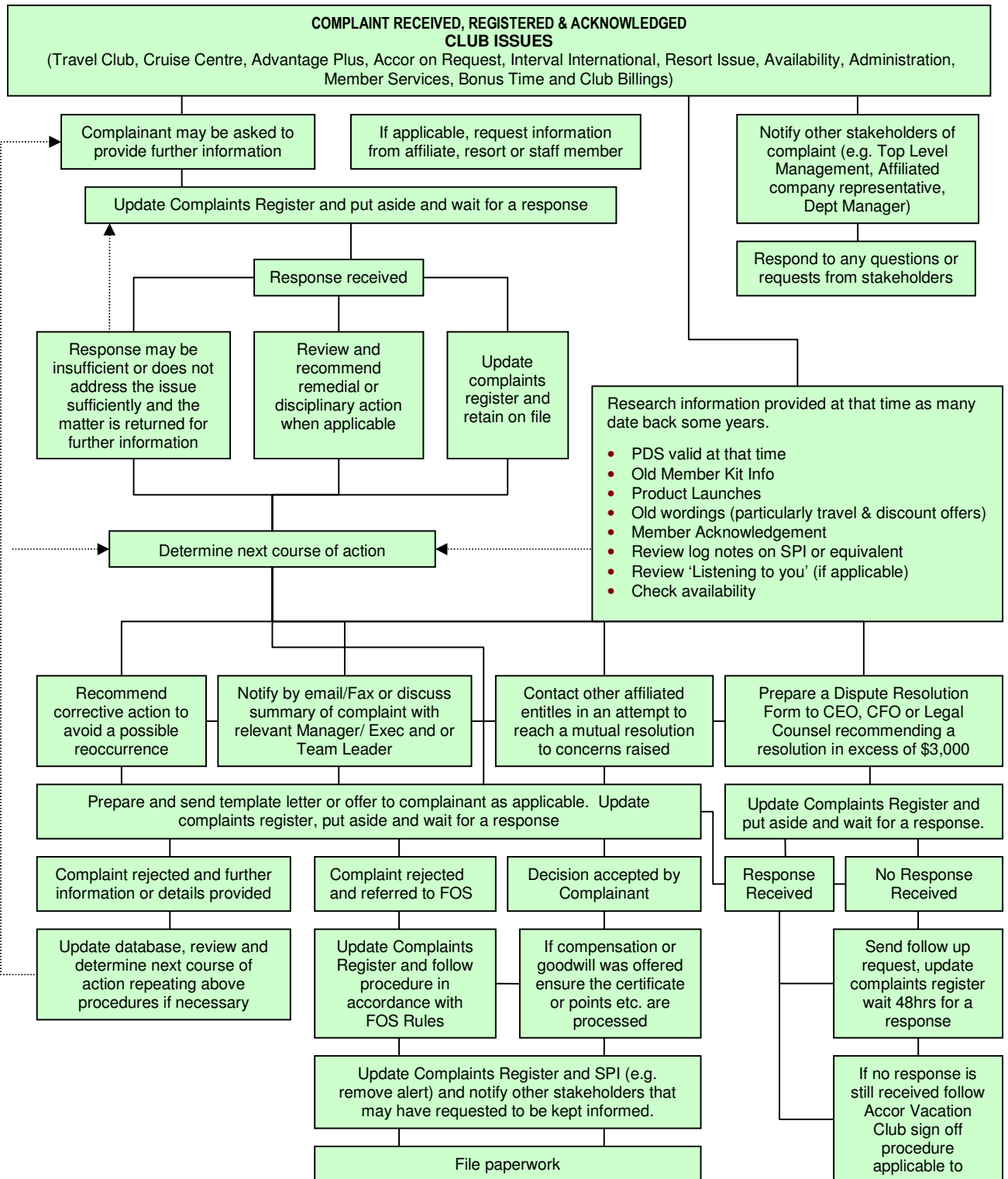
Complaint Status
Follow up date
(if applicable)

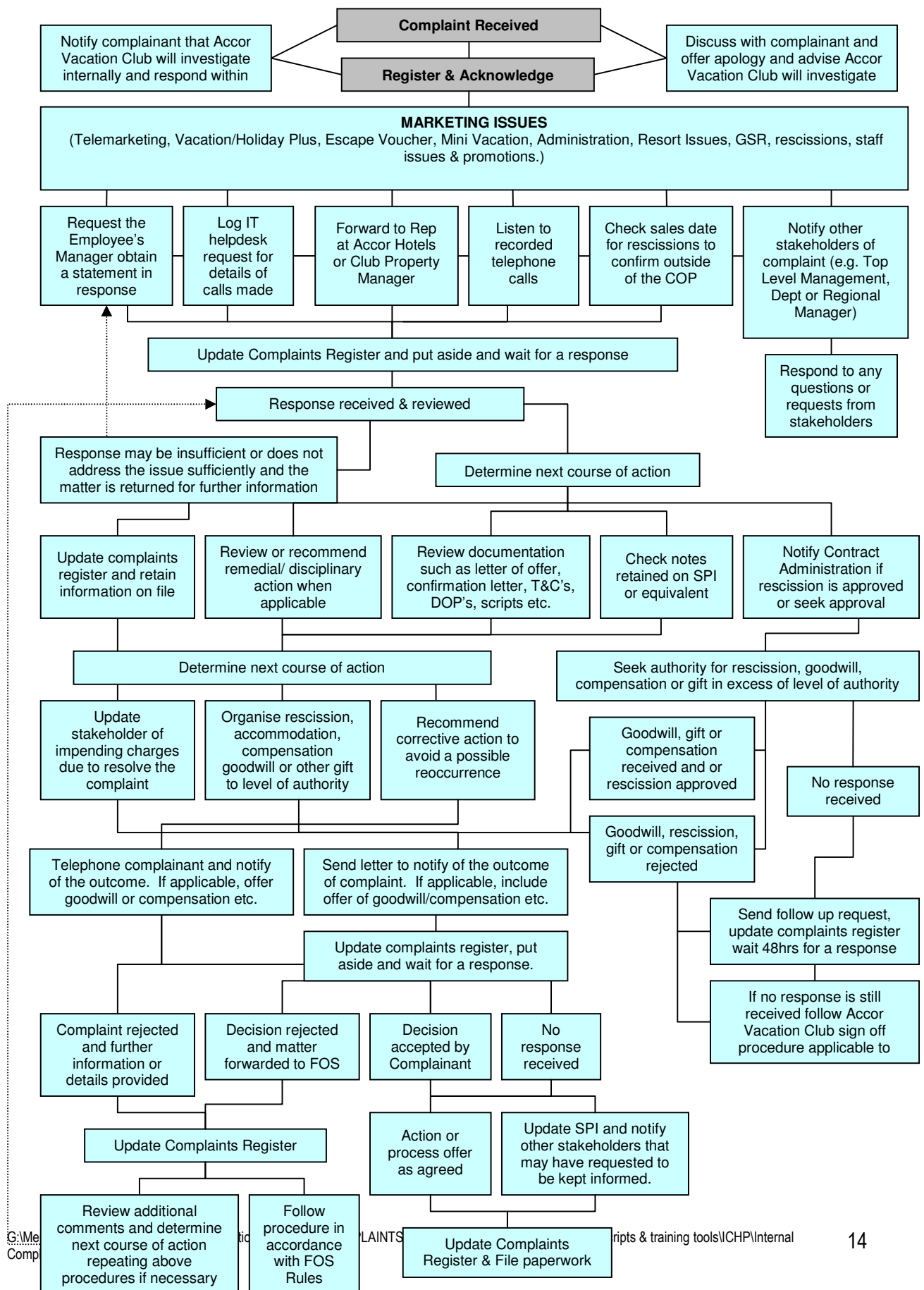
OFFICE USE ONLY

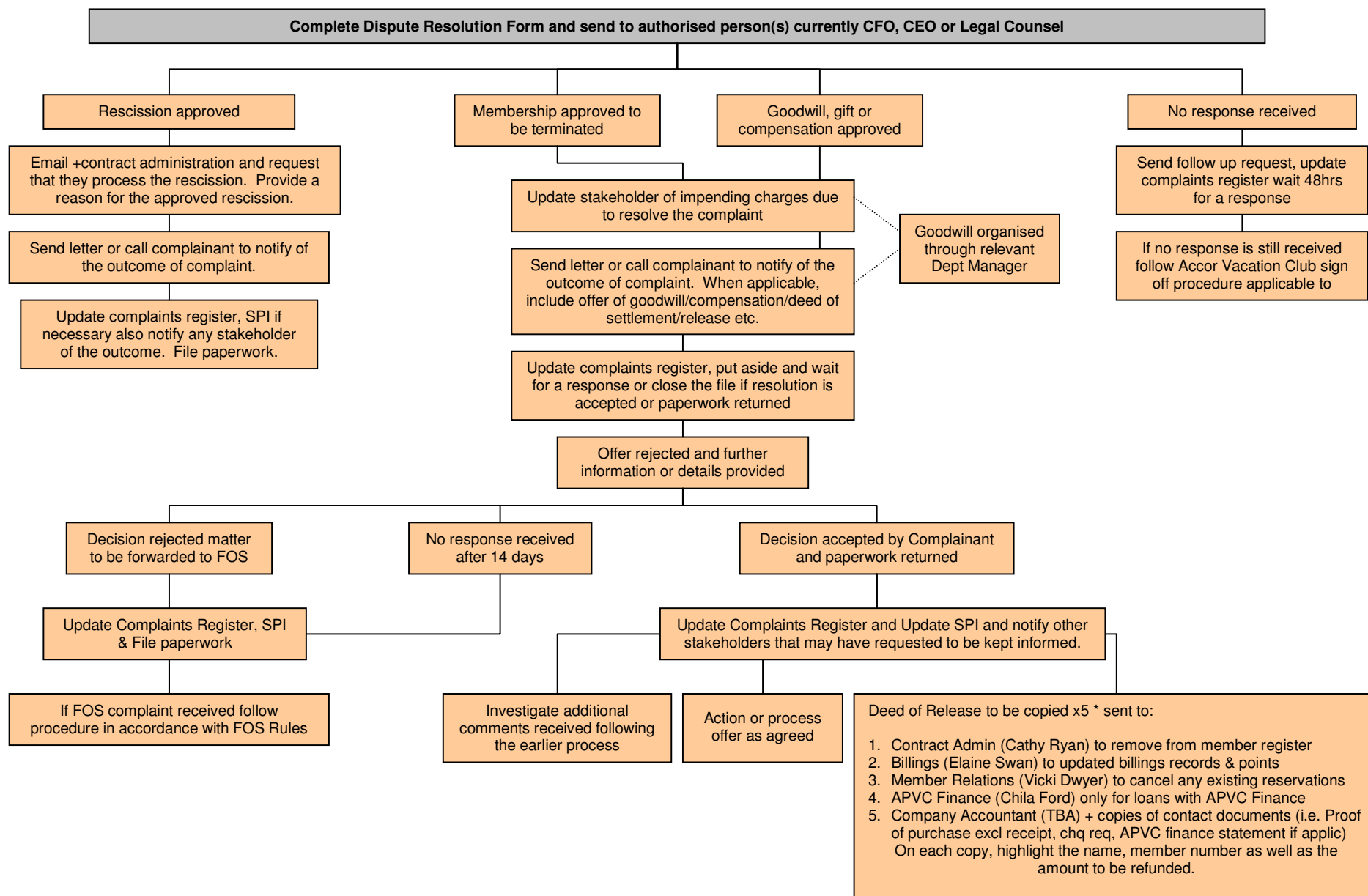
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Appendix II- Process Flow Diagrams









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ACCOR VACATION CLUB INTERNAL COMPLAINTS INVESTIGATION WORKSHEET

1. Make an initial assessment of issue raised for severity, safety implication, complexity, impact and the need/possibility of immediate action.
2. Assess whether the ICHP is the most appropriate way of handling this complaint. If not, discuss alternatives with the complainant.
3. Consider whether the complaint can be resolved without further investigation.
4. If the complaint is about proposed action by your organisation consider whether the action should be deferred while the complaint is investigated

Complainants			
Member Number		Complaint Number	

5. Check to see if there are any previous complaints from this person or about the issue concerned
6. Contact the complainant to:
 - a. Clarify the complaint
 - b. Clarify the outcome sought
 - c. Check whether they need support of any kind, whether they have poor sight, hearing or language difficulty, comprehension limitations and what they need to understand the discussion properly
 - d. Explain the investigation procedure
7. Brief yourself on the relevant background to the complaint

REGISTRATION DETAILS

Complaint Acknowledged	Verbally	In writing	Not Acknowledged
Log note recorded on SPI	Yes	No	
A.P.V.C. Finance Notified	Yes	No	Not under finance
Key staff or Dept Manager Notified	Yes	No	

Obtain all relevant documents (ensuring that you see originals, not copies). Get copies of all relevant documents you need.

8. Investigate and consider all of the relevant circumstances and information surrounding the complaint

REVIEW CONTRACT FILE

'Listening to you' printed	
'Member Acknowledgement' Printed	
Holiday Planner reviewed	

MISCELLANEOUS CHECKS

What tour gift did they receive	
If EV, has it been utilised?	
Have they provided any referrals?	
Have they upgraded?	
Print log notes from SPI	

FINANCE CHECKS

Are they cashed out or finance	Cashed out	Financed	Other
Are their payments up to date			
Have they paid their Club Fees			
If not, when was last payment made			

MEMBER SERVICES HISTORY

Any previous bookings or pending bookings	
Have they attempted to use	
If so, how many times	
Have they been to a workshop	
Have they been on a Club tour/event	
Have they had any contact with II?	

RESORT COMPLAINTS

Which resort is the complaint about	
-------------------------------------	--

9. Establish the relevant sequence of events from the files and also the names of officers/members most directly involved in the complaint
10. Prepare a line of questioning for each person to be interviewed:
 - a. Use open not leading questions
 - b. Do not express opinions in words or by your body language
 - c. Ask single, not multiple questions.

11. Arrange the order of interviews so that where you need to establish normal procedures, you do this first from more senior officers and end with the officers most directly involved with the complaint.
12. Inform those to be interviewed that a friend or other assistant can accompany them, provided that the friend is not in a supervisory position over the interviewee. Explain the complaint clearly to them. Where a complaint is about an officer, the Human Resources Manager should be informed.
13. Consider whether you need a witness if you are expecting a particularly difficult interview.
14. Interviews should be conducted in an informal and relaxed manner, but persist in your questions if necessary. Don't be afraid to ask the same question twice. Make notes of each answer.
15. Try to separate hearsay evidence from fact by asking interviewees how they know a particular fact,
16. Deal with conflicts of evidence by seeking corroborative evidence. If this is not available, then as an exceptional measure, consideration can be given to organising a confrontation between the conflicting witnesses.
17. At the end of the interview, summarise the main points made by the interviewee and ask if he or she has anything to add.
18. Make a formal record of interview from the written notes as soon as possible after the interview while your memory is fresh. Never leave it longer than the next day.
19. If appropriate, visit the establishment complained about unannounced to check normal practices.
20. Draft a report setting out the evidence obtained, preferably without including your own opinions and circulate this for comment to all those interviewed, including the complainant, unless there are special reasons not to do so.
21. Consider comments and amend the report as necessary, adding conclusions and if appropriate, a suggested remedy for the complainant

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Appendix IV – Accor Vacation Club Complaints Resolution Statement

Accor Vacation Club Complaints Resolution Statement

This Complaints Resolution Statement sets out the policy of A.P.V.C. Ltd as Responsible Entity for the Accor Vacation Club ARSN 094 718 108 in dealing with and responding with member complaints. We are committed to the standards contained within the Australian Standard (ISO 10002:2006) on Complaints Handling and ASIC Policy Statement 165 on Internal and External Dispute Resolution.

Accor Vacation Club Principles of Complaint Resolution

- You have the right to complain or comment, and you will be treated with courtesy, respect and confidentiality;
- We are committed to the efficient and fair resolution of complaints;
- Our dispute resolution (complaints handling) process is accessible to all;
- Complaints shall be dealt with as quickly and efficiently as possible;
- There will be no fee charged to complainants for our dispute resolution process; and
- You will be promptly informed of our decision and reason.

What is a complaint?

- A complaint is any expression of dissatisfaction with a product or service provided or offered by us.
- A complaint may be written or verbal and may be delivered in person, by mail, by telephone, by facsimile or by e-mail.
- A complaint can be made to any staff member of Accor Vacation Club, and will be referred immediately to an internally designated Complaints Resolutions Officer.

Our Complaint Resolution/Complaints Handling Process

Upon receipt of a complaint, our internal complaints handling procedure will be activated. You will promptly receive an acknowledgement to your written complaint. This will be immediately generated for emails forwarded to complaintresolution@accorvacationclub.com.au. An internal review will be undertaken by a Complaints Officer, and we shall endeavour to provide you with a written response within 45 days.

A number of remedies are available in response to complaints/disputes to ensure we resolve complaints in an appropriate manner.

Complaints received are recorded on an internal Complaints Register, are escalated to senior management as appropriate, and are reviewed quarterly by our Compliance Committee (principally comprising external members).

Periodic analysis of complaints received is also undertaken to enable identification and resolution of any systemic trends or issues, and implement focussed enhancements to our processes and systems.

What can you do if you remain unsatisfied by our resolution of your complaint?

We are a member of the Financial Ombudsman Service (FOS), an ASIC approved external dispute resolution scheme, established to provide free advice and assistance to you as members of a registered managed investments scheme. You have the right to pursue resolution of your complaint with FOS if you are not satisfied with our response. FOS can be contacted by telephone on 1300 780 808 or by email at www.fos.org.au and info@fos.org.au.

What should you do if you wish to obtain further information or lodge a complaint?

Complaints can be lodged with, and enquiries directed to:

Customer Service and Complaints
Accor Vacation Club
P.O Box 3755
Robina Town Centre QLD 4226

or by email at complaintresolution@accorvacationclub.com.au or by telephone on 1300 761 218 (toll free)
or from New Zealand 0800 761 218 (toll free)

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Appendix V– Sample Complaint Form

Member Complaint Form

Member Details:

Member Number:	Member Level:
Surname:	Given Name:
Surname:	Given Name:
Postal Address:	

My/our complaint relates to (Please tick):

Accor On Request		Administration	
Bonus Time		Interval International	
Availability		Member Services/Relations	
Advantage Plus		Accor Vacation Club Cruise & Travel	
Home Club Property		Property Name	
Workshop		Consumer Finance	
Sales Staff		If your complaint relates to a staff member please provide their name:	
Sales Process		Referrals	
Upgrades			
Other			

Details of Complaint:

Please provide the full details of your complaint and include as much information as possible to help us fully address your concerns. (Use as much space as necessary and additional pages if necessary)

My/our desired outcome is:

Your complaint will be promptly acknowledged and your complaint will then be actioned in accordance with our Internal Complaints Handling Procedure. We will endeavour to ensure that it is resolved within 45 days. If you have any questions you may contact us on AUS 1300 761 218 or 0800 761 218 for New Zealand residents

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Appendix VI – Sample Correspondence

Example Member Acknowledgement Letter – M001a (via mail)

Our Ref:

[Date]

[name & address]

Dear

Re: Accor Vacation Club (the “Club”)- Membership

We acknowledge receipt of your [redacted] of received [redacted] where you have raised concerns regarding your membership in the Accor Vacation Club.

Thank you for taking the time to put your concerns in writing.

The Accor Vacation Club is a Managed Investment Scheme registered under Chapter 5C of the Corporations Act. Under the Act, A.P.V.C. Limited as the Responsible Entity (RE) of the Scheme is subject to trust obligations and notably express statutory obligations.

If a member has an issue of complaint, the Club’s Responsible Entity is bound to record that complaint and attempt to achieve some form of resolution with the member. However, where the member seeks some form of redress that requires the Responsible Entity to agree to cancel or modify a person’s membership, the Responsible Entity cannot do so without first undertaking a full investigation of the member’s assertions and ultimately satisfying itself to a reasonable level of certainty that the assertions can be substantiated.

The Club’s Complaint Resolution procedure has been established in compliance with our regulatory obligations and the Australian Standard for complaints handling.

Accordingly, our process when investigating a complaint may involve us obtaining further, more specific details from you regarding matters of concern and for us to check our records, obtain statements from the relevant people and determine the most appropriate response in the circumstances.

We advise that every attempt will be made to resolve your concerns within 45days. In extraordinary circumstances we may request an extension up to 90 days however; we will seek your permission should this be necessary. We will notify you of the outcome of your concerns once our investigation is complete.

Until you receive our formal response or at any time during our investigation period should you have any additional comments or concerns to those already raised please do not hesitate to contact me on 1300 761 218 or via email to complaintresolution@accorvacationclub.com.au.

Yours faithfully
Accor Vacation Club

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Example Member Acknowledgement Letter – M001c (automatic email reply)

THIS IS AN AUTOMATIC RESPONSE.

We acknowledge receipt of your email and we thank you for taking the time to put your concerns in writing.

We advise that a representative will investigate your comments in accordance with our Internal Complaints Handling Procedure. This procedure is established in compliance with our regulatory obligations and the Australian Standard.

Our process when investigating your complaint may involve us obtaining further, more specific details from you regarding your matters of concern and for us to, where applicable, check our records, obtain statements, and determine the most appropriate response in the circumstances.

Accordingly we advise that every attempt will be made to resolve your concerns within 7 to 45 days depending on the nature of your concerns and the extent of investigation that will be required. In exceptional circumstances some issues may take up to 90 days however we will promptly advise you if we may require the additional time.

Once our investigation is complete, we will notify you of the outcome of your concerns. Until you receive our formal response or at any time during our investigation period should you have any additional comments or concerns to those already raised please do not hesitate to contact me on our office on 1300 761 218, via email at complaintresolution@accorvacationclub.com.au or facsimile on 07 55623166.

Yours faithfully
Accor Vacation Club

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Sample Complaints Process Information Document – M000b

Our Ref:

[Date]

[Name & Address]

Dear First name/Sir or Madam]

A.P.V.C. Limited (“Responsible Entity”)
Accor Vacation Club (the “Club”) Membership No:

We reply to of , and thank you for taking the time to to us concerning .

It is Accor Vacation Club's policy to seek to have satisfied members. For that reason, we seek to deal with complaints according to the Australian Standard on Complaints Handling, i.e. to deal with them effectively and fairly. Our process when investigating a complaint may involve us obtaining further, more specific details from you regarding matters of concern and for us to check our records, obtain statements and determine the most appropriate response in the circumstances.

If the complaint cannot be resolved to your satisfaction, you have the right to further refer the complaint to the External Complaints Resolution Organisation. A brochure detailing their services will be included in our response to the concerns raised.

Until you receive our formal response or at any time during our investigation period should you have any additional comments or concerns to those already raised please do not hesitate to contact me on 1300 761 218 or via email to complaintresolution@accorvacationclub.com.au.

Yours faithfully,
Accor Vacation Club

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Example Rejection Letter- M012 - Members seeking reversal of Membership purchase

Our Ref:

[Date]

[Name & Address]

Dear First name/Sir or Madam]

RE: Accor Vacation Club (the “Club”)

We reply to of requesting the cancellation and refund of your Bronze Membership in the Accor Vacation Club.

Your complaint has progressed through our Internal Complaints Handling Procedure and we have given careful consideration to the concerns raised and are of the opinion that we have acted properly in the circumstances.

The Accor Vacation Club is a Managed Investment Scheme, registered with the Australian Securities and Investments Commission (ASIC) and governed by the *Corporations Act*. Under the Act, A.P.V.C. Limited as the Responsible Entity (RE) of the Scheme is subject to trust obligations and notably express statutory obligations. As a result, the RE is unwilling to summarily agree to cancel or modify a person's membership unless compelling circumstances are first established.

If a member has an issue of complaint, the RE is bound to record that complaint and attempt to achieve some form of resolution with the member. However, where the member seeks some form of redress that requires the RE to agree to cancel or modify a person's membership, the RE cannot do so without first undertaking a full investigation of the member's assertions and ultimately satisfying itself to a reasonable level of certainty that the assertions can be substantiated.

As detailed in the section of Product Disclosure Statement (PDS) given to you at the time of attending your presentation and included in your membership documents, it clearly discloses that Members cannot withdraw from the Club except in accordance with the Constitution of the Club in the following cases:

1. Transfer or transmission of membership
2. Forfeiture and sale for non-payment of Application Monies or Membership fees; and
3. Expiry of their standard or limited membership.

Use whichever is applicable

- At the moment, we wish to advise that we are not yet persuaded that the concerns you have identified establish a sufficient case for the RE to permit the cancellation of your membership.
- In the absence of further information, I am currently unable to recommend to the RE.
- Before we are able to make a recommendation that the RE consider your request for redress we will require

- At the moment I am of the opinion that you are yet to provide sufficient information to persuade me to recommend to the RE that

As the Club is a Managed Investment Scheme we are obligated to advise you that if you are dissatisfied with the outcome of your complaint, or you do not obtain a resolution which you consider satisfactory, you are able to refer your concerns to external independent complaints resolution organisations. In particular you are able to refer to the Financial Ombudsman Service (FOS). FOS can be contacted on 1300 780 808 or by visiting their web site at www.fos.org.au. A brochure detailing their services is also attached.

Alternatively, while the cancellation of your membership has not been approved it is open to you to sell your membership. Should you wish to consider disposing of your membership we will do everything that we can to assist you. Some options that you may wish to consider are:

- Advertise your points for sale in newspaper classifieds
- Advertise your points for sale on online auction sites
- Engage the services of a timeshare resale broker who will assist you with your sale however, they may charge you a fee for their services, and we recommend that you discuss this with your Timeshare Broker before placing your listing with them.

The Club will assist you with transfer arrangements once you have found a purchaser.

It is my hope that this letter gives you an understanding of the constraints that affect our ability to provide a resolution in the manner you seek. I remain open to receive any further information or submissions that may warrant our further consideration of this matter.

Yours faithfully

Accor Vacation Club

OFFICE USE ONLY

Example Acceptance Letter – M040

Our Ref:

[Date]

[Name & Address]

Dear First name/Sir or Madam]

A.P.V.C. Limited (“Responsible Entity”)
Accor Vacation Club (the “Club”) Membership No:

We reply to of , and thank you for taking the time to to us concerning .

I/We have given careful consideration to the concerns. I/We accept that (insert details where you think that the client has made a valid submission).

In the circumstances I/We are willing to (give details of what action/remedy you are prepared to offer).

I would like to point out to you that if you are still dissatisfied with my/our decision it is open to you to raise your complaint with the Financial Ombudsman Services. They can be contacted on 1300 780 808 or by visiting their web site at www.fos.org.au. A copy of their brochure detailing their services is also attached to this letter.

Alternatively you may contact me on should you wish to discuss the matter further.

Yours faithfully
Accor Vacation Club