



Internal Dispute Resolution Policy

Product Issuer: RentPay Technology ACN 636 254 709 / AR No: 001286725.
An authorised representative of Flexewallet ACN 164 657 032 / AFSL 448066

Internal Dispute Resolution Policy

RentPay Technology Pty Ltd

Version 2.0 | 20 April 2026

Product Issuer: RentPay Technology ACN 636 254 709 / AR No: 001286725

Document History

Version	Date	Author	Summary of Changes
1.0	11 February 2021	RentPay	Initial policy document
2.0	20 April 2026	RentPay	Full policy review and expansion for ASIC RG 271 compliance. Added: Scope, Definitions, Vulnerable Customers, Complaints Register, Timeframe Summary, Reporting & Oversight, Policy Review.

1. Purpose

This Policy aims to clarify the process for customers who would like to lodge a complaint about RentPay Technology Pty Ltd (“RentPay”).

RentPay is committed to handling complaints fairly, efficiently, and in accordance with the requirements of ASIC Regulatory Guide 271, Internal Dispute Resolution (RG 271).

If you would like to receive this policy in a different format, please contact RentPay and we will do our best to accommodate your request.

2. Scope

This Policy applies to all complaints received by RentPay Technology Pty Ltd in connection with the following products and services:

- RentPay – rent payment and wallet services
- Scorebuilder – credit-building repayment products
- Any other products or services issued or distributed by RentPay

This Policy applies to complaints received from:

- Renters
- Real estate agents, and related agency staff
- Third parties acting on behalf of any of the above (including credit repair agencies)

This Policy does not apply to general enquiries or service requests that do not constitute a complaint as defined in Section 3 below.

3. Definitions

The following definitions apply throughout this Policy:

Term	Definition
Complaint	An expression of dissatisfaction made to or about RentPay, related to its products, services, staff, or the handling of a complaint, where a response or resolution is explicitly or implicitly expected. This includes complaints received verbally, in writing, via email, or through third parties such as credit repair agencies or legal representatives.
General Enquiry	A request for information, an explanation of processes, or assistance with account management, where no dissatisfaction is expressed and no resolution is sought. General enquiries are not recorded as complaints in the Complaints Register.
IDR Response	A written communication from RentPay to the complainant setting out the outcome of RentPay's internal investigation of the complaint.
IDR Delay Notification	A written notification issued when RentPay requires additional time beyond 30 calendar days to finalise its investigation and IDR Response.
AFCA	The Australian Financial Complaints Authority – the approved external dispute resolution (EDR) scheme of which RentPay is a member (Membership No. 86216).
EDR	External Dispute Resolution – the process of referring a complaint to AFCA when the complainant is dissatisfied with RentPay's IDR Response.
Vulnerable Customer	A customer who, due to their personal circumstances, may require additional care and flexibility in how their complaint is managed. This may include customers experiencing financial hardship, family violence, mental health challenges, or other circumstances that affect their ability to engage with the complaints process.
RG 271	ASIC Regulatory Guide 271 – Internal Dispute Resolution, which sets the standards RentPay must meet in handling complaints.

4. Lodging a Complaint

You may lodge a complaint with RentPay Technology Pty Ltd via any of the following channels:

Telephone	1300 797 933
Email	complaints@rentpay.com.au
Post	RentPay GPO Box 2543, Perth WA 6001

If you need assistance with lodging your complaint, the following services are available:

TIS Interpreter Services	https://www.tisnational.gov.au/ 131 450
National Relay Services	Voice Relay: 1300 555 727 TTY: 133 677 SMS Relay: 0423 677 767

RentPay accepts complaints lodged by authorised third parties, including credit repair agencies, legal representatives, and financial counsellors acting on a complainant's behalf. RentPay may request written authority from the complainant before disclosing account information to a third party.

5. Vulnerable Customers

RentPay recognises that some customers may require additional support when making a complaint. RentPay will take reasonable steps to identify customers who may be experiencing vulnerability and will adapt its complaint management approach accordingly.

Circumstances that may indicate vulnerability include, but are not limited to:

- Financial hardship or difficulty meeting repayment obligations
- Experience of family or domestic violence (including financial abuse or identity theft by a partner or former partner)
- Mental health challenges that affect a customer's ability to engage with the complaints process

- Significant life events such as serious illness, bereavement, or sudden unemployment
- Language barriers or low financial literacy

Where RentPay identifies or is informed that a customer is experiencing vulnerability, RentPay will:

- Treat the customer with sensitivity, dignity, and respect
- Offer flexible communication options and additional time where appropriate
- Prioritise the complaint where circumstances warrant urgent resolution
- Ensure the customer is aware of relevant external support services, including financial counselling and legal assistance
- Not require a customer experiencing family or domestic violence to obtain evidence from or interact with the party who caused harm

RentPay acknowledges that vulnerability may not be immediately apparent and may change over time. Staff are trained to remain alert to indicators of vulnerability throughout the complaint management process.

6. Acknowledging a Complaint

RentPay will aim to acknowledge a complaint within 24 business hours of receipt and in any event as soon as practicable. We may acknowledge the complaint verbally or in writing.

We will take into account the method used by the complainant and any preferences the complainant may have expressed about communication methods when choosing an appropriate communication method.

Upon acknowledgement, RentPay will provide the complainant with:

- A unique complaint reference number
- The name or role of the person handling the complaint

- An outline of the next steps in the complaints process
- An estimated timeframe for resolution

7. Assessment and Investigation

We will prioritise complaints according to the urgency and severity of the issues raised. We may contact you at various points in our investigation to obtain or clarify information. We will adopt flexible complaint management approaches to promote early resolution of the complaint wherever possible.

We will consider a broad range of possible remedies when attempting to resolve the complaint. Remedies may include an apology, a refund or waiver of fee, compensation, replacement, correcting incorrect records, or ceasing legal or other action which may cause detriment.

The following timeframes apply to complaint management:

Term	Definition	RG 271 Reference
Acknowledge complaint	Within 24 business hours (as soon as practicable)	RG 271.55
Provide complaint reference number	At time of acknowledgement	RG 271.56
Issue IDR Response	No later than 30 calendar days after receipt	RG 271.60
Issue IDR Delay Notification (if required)	Before the 30-day deadline lapses	RG 271.69
Close complaint (resolution actioned)	As soon as practicable after IDR Response	RG 271.71
Refer complainant to AFCA (if unresolved)	At any time after IDR Response is issued	RG 271.72

8. Internal Dispute Resolution (IDR) Response

8.1. Standard IDR Response

At the completion of our investigation, and in any event no later than 30 calendar days after receiving the complaint, RentPay will provide the complainant with an Internal Dispute Resolution (IDR) Response. An IDR Response is a written communication from RentPay, informing the complainant of:

- (a) The final outcome of the complaint;
- (b) The right to take the complaint to AFCA if they are not satisfied with the IDR Response; and
- (c) The contact details for AFCA.

If RentPay rejects or partially rejects the complaint, the IDR Response will clearly set out the reasons for the decision by:

- (a) Identifying and addressing all issues raised in the complaint;
- (b) Setting out RentPay's findings on material questions of fact and referring to the information that supports those findings; and
- (c) Providing enough detail for the complainant to understand the basis of the decision and to be fully informed when deciding whether to escalate the matter to AFCA or another forum.

8.2. Extension

In limited circumstances (i.e. if the complaint is particularly complex or if circumstances beyond RentPay's control cause complaint management delays), the IDR Response timeframe may be extended. If an extension is required, RentPay will issue an IDR Delay Notification that will inform the complainant of:

- (a) The reasons for the delay;
- (b) Their right to complain to AFCA if they are dissatisfied with the delay; and
- (c) The contact details for AFCA.

The IDR Delay Notification will be issued before the 30-day IDR Response

deadline lapses. Extensions will only be used where genuinely required and will not be used as a routine practice.

8.3. Resolution within 5 Business Days

Where RentPay resolves a complaint within 5 business days of receipt, RentPay may close the complaint without issuing a formal IDR Response where RentPay has:

- (a) Resolved the complaint to the complainant's satisfaction; or
- (b) Given the complainant an explanation and/or apology where RentPay can take no further action to reasonably address the complaint.

However, a written IDR Response must still be issued, even where the complaint is closed within 5 business days, if:

- (a) The complainant requests a written response; or
- (b) The complaint relates to financial hardship.

8.4. Closing Complaints

We will ensure that the complaint resolution outcome (e.g. refund, correction of records, removal of a credit enquiry) is implemented in a timely manner once the complaint is closed. Closure of a complaint in the Complaints Register must not occur until the resolution action has been completed or confirmed.

9. Complaints Register

RentPay maintains a Complaints Register to record all complaints received across all product lines. The Complaints Register is a key compliance record and must be maintained accurately and kept up to date.

The following information must be recorded for each complaint:

- Unique complaint reference number
- Date complaint received (open date)

- Date complaint closed (close date)
- Number of calendar days the complaint was open
- Product line / account type (e.g. RentPay, RentBond, Scorebuilder)
- Complainant name and account ID
- Complaint type / category (e.g. Credit enquiry dispute, Privacy, Fraud, Hardship)
- Whether the complaint is at IDR or EDR stage
- If EDR: external reference number and scheme name (e.g. AFCA case number)
- Risk value / estimated financial exposure
- Cost to resolve (actual)
- Current status (Open / Closed)
- File notes summarising key actions, decisions, and dates

The Complaints Register must be:

- Maintained by the designated Complaints Officer or their delegate
- Reviewed monthly by senior management to identify trends and systemic issues
- Retained for a minimum of 7 years from the date of closure of each complaint, in accordance with ASIC's record-keeping requirements
- Made available to ASIC upon request

10. Reporting and Oversight

RentPay is committed to using complaints data to identify systemic issues, improve its products and services, and meet its regulatory reporting obligations.

10.1. Internal Reporting

The following reporting cadence applies:

Frequency	Audience	Content
Monthly	Senior Management / Complaints Officer	Total complaints received, open vs closed, complaint types, average resolution time, complaints at EDR stage, any systemic issues identified
Quarterly	Board / Executive	Summary of complaints trends, systemic issues and remediation actions, AFCA outcomes, policy compliance status
Annually	Board / Compliance	Full review of complaints data, ASIC IDR reporting obligations, policy review outcomes, training requirements

10.2. Systemic Issues

Where complaints data reveals a pattern of similar complaints, or where a single complaint reveals a systemic issue with a product, process, or system, RentPay will:

- Escalate the issue to senior management immediately
- Investigate the root cause and scope of the issue
- Implement remediation for affected customers, including proactive outreach where appropriate
- Document the issue and remediation steps in the Complaints Register
- Report the issue to AFCA where required

10.3. ASIC Reportable Situations

RentPay will comply with its obligations to report to ASIC under the reportable situations regime (Part 9.4AAA of the Corporations Act 2001).

This includes reporting any significant or systemic failures in its IDR processes to ASIC within the prescribed timeframes.

11. Australian Financial Complaints Authority (AFCA)

If you are not satisfied with the outcome of RentPay’s internal complaint process, you have the right to lodge a complaint with the Australian Financial Complaints Authority (AFCA). AFCA is an approved external dispute resolution scheme authorised by ASIC.

RentPay is a member of AFCA. RentPay’s AFCA membership number is: 86216

You may contact AFCA at any time. There is no cost to complainants for using AFCA’s service. AFCA’s decisions may be binding on RentPay.

Telephone (free call)	1800 931 678
Email	info@afca.org.au
Website	www.afca.org.au
Post	GPO Box 3, Melbourne VIC 3001
Fax	03 9613 6399
Interpreter Services	131 450
National Relay Services	Voice Relay: 1300 555 727 TTY: 133 677 SMS Relay: 0423 677 767

12. Policy Review

This Policy will be reviewed at least annually, or earlier where:

- ASIC publishes updates to RG 271 or related regulatory guidance
- AFCA issues a determination that identifies a gap or deficiency in RentPay’s complaint handling
- An internal audit or compliance review identifies a material gap

- There is a significant change to RentPay's products, services, or organisational structure

The Policy owner is the Complaints Officer (or equivalent designated role). All proposed changes to this Policy must be approved by the Chief Executive Officer or the Board, as appropriate, prior to implementation.

The current version of this Policy will be made publicly available on RentPay's website and provided to customers upon request.