



---

## Complaints Policy

---

### Your Rights

As a Unit Holder of a Fund offered by Paragon, your rights are governed by the Constitution of this Fund and the law.

Your rights include, but are not limited to, the right to:

- Receive distributions (where applicable);
- Receive copies of audited Annual Financial Statements; and
- Receive any and other information circulated by Paragon with respect to the Fund you have invested in.

You are also entitled to request a copy of the Constitution of the Fund. You may do so by sending your request in writing to [client.services@paragonfunds.com.au](mailto:client.services@paragonfunds.com.au) or calling us on 1300 522 500.

You do not have the right to participate in the management or operation of the Fund.

### Internal Dispute Resolution

Paragon's aim is to resolve all inquiries and complaints swiftly and to the satisfaction of our Unit Holders.

Paragon has a formal internal complaints and dispute handling resolution process (IDR). The Constitution establishes a procedure for the directors of Paragon to receive, consider, investigate and respond to complaints made by Unit Holders dissatisfied with the management or administration of the Paragon Australian Long Short Fund. Effective from 5 October 2021, Paragon's IDR process will be in accordance with ASIC's regulatory guide 271 Internal Dispute Resolution, which will override the Fund's constitution where applicable.

You can lodge a complaint with us by:

1. Sending an email to [client.services@paragonfunds.com.au](mailto:client.services@paragonfunds.com.au);
2. Writing to us – mailing address – PO Box 102 Elwood VIC 3184; or
3. Calling us on 1300 522 500.

If you do call, we may still request that you send us a follow up email or letter in writing detailing your complaint, particularly if there is a need for specific details to be received in order for us to adequately assess your complaint.

Unless we can resolve your complaint on the spot, you will receive an acknowledgement of your complaint from Paragon within one (1) business day. This can be in the form of an email, letter or phone call, as deemed appropriate in this instance.

Paragon will aim to resolve the complaint swiftly. You will receive an email or letter outlining the complaint and how it's been resolved. If the complaint is either partially or fully rejected, we will set out clearly the reasons for our decision.

The maximum timeframe permitted for Paragon to resolve your complaint is 30 calendar days from the date of first receiving your complaint or inquiry.

If due to unusual circumstances or events, Paragon is of the view that it will be unable to resolve/respond to the complaint within 30 days, you will be advised by email or letter, outlining the reason for the delay.

Exceptional circumstances are typically such as:

1. Resolution of the complaint is particularly complex. eg. it is about a transaction or event that occurred more than 6 years ago and requires reconstruction of account information; or
2. There are circumstances beyond Paragon's control. eg. information must be obtained from a third party.

### External Dispute Resolution

If you are still not satisfied, and only after you have sought a resolution directly with us, you are entitled to refer your complaint to the Australian Financial Complaints Authority (AFCA). The AFCA external dispute resolution scheme is authorised under the Treasury Laws Amendment (Putting Consumers First—Establishment of the Australian Financial Complaints Authority) Act 2018(Cth) ('the AFCA Act'). AFCA independently assists consumers and small businesses to make and resolve complaints about financial firms, including managed investment schemes such as our Fund.

You may obtain further information regarding what complaints can be considered and what is required by referring to their website at [www.afca.org.au](http://www.afca.org.au).

### Paragon's membership details:

**AFCA Member Name:** Paragon Funds Management Ltd  
**AFCA Member ID:** 46202

A complaint can be made online via AFCA's website or otherwise by downloading and completing an [AFCA Complaints form](#) and mailing it with all necessary supporting documentation to:

**Australian Financial Complaints Authority**  
GPO Box 3, Melbourne VIC 3001

**Complaints enquiries can also be made by phone to:**  
1800 931 678.