

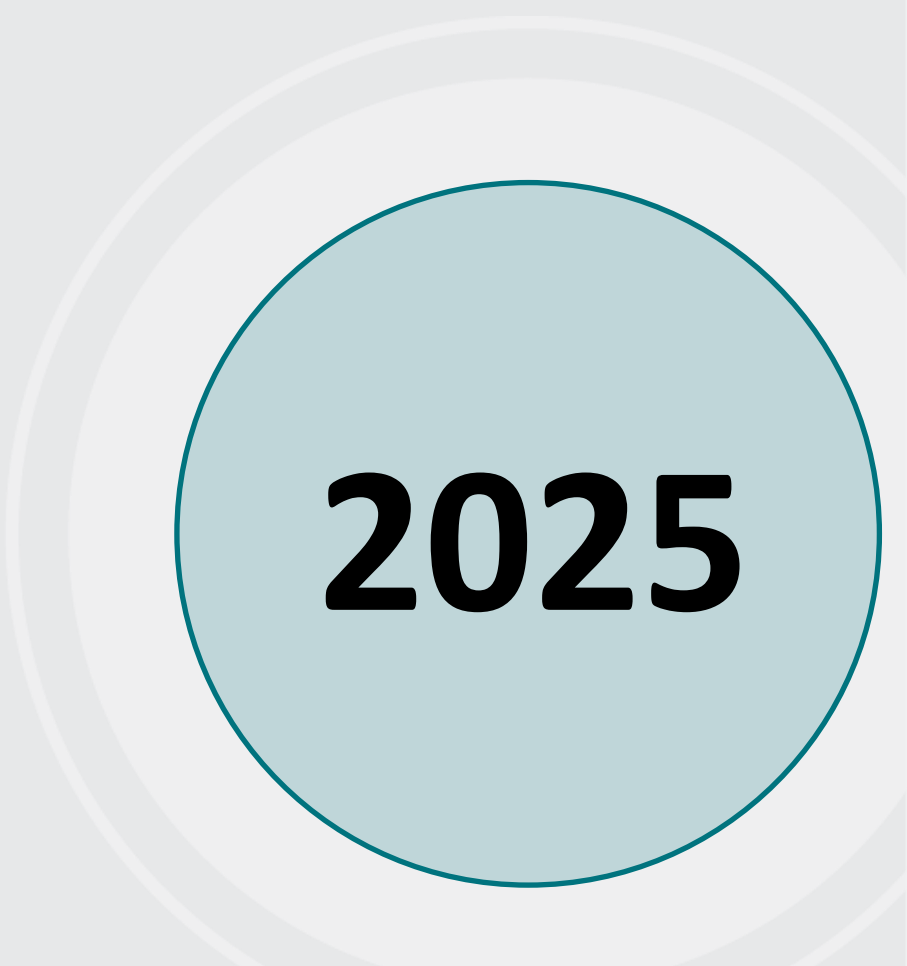


Recoveries Corporation Holdings Pty Ltd

# Hardship and Vulnerable Customer Policy

VERSION 2.0

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**2025**

## TABLE OF CONTENTS

Overview and Purpose .....	3
Scope .....	3
Introduction To hardship and Vulnerable Customers.....	3
Guiding Principles.....	3
Our Commitment .....	3
People focus .....	3
Applying for assistance .....	4
Authorising someone else to help.....	4
Accessibility .....	4
Recording hardship .....	4
Confidentiality .....	4
Recording Personal Information.....	5
Hardship framework .....	5
What is Financial hardship? .....	5
All staff .....	5
Identifying Issues and Vulnerabilities .....	6
Referring to a client's internal process.....	6
Vulnerability framework .....	6
Understanding Vulnerabilities .....	6
Identifying Vulnerabilities .....	7
Interpreter .....	7
Teletypewriter (TTY) Service .....	8
Mental Health.....	9
Financial distress .....	9
Financial Abuse.....	10
Elder Abuse.....	10
Family and Domestic Violence .....	11
Joint Facilities and Relationship Breakdowns.....	12
Natural disaster or emergency circumstances .....	13

Assisting Customers in Vulnerable Circumstances .....	13
Complaints .....	15
Supporting Recoveriescorp staff members.....	16
Managing Unreasonable conduct .....	16
Support Services.....	17
Debt Helplines .....	17
Domestic & Family Violence .....	17
Grief17	
Refugee Support .....	17
Government & Legal Services .....	17
DEFINITIONS, ACRONYMS, ABBREVIATIONS.....	18
DOCUMENT HISTORY .....	19

## OVERVIEW AND PURPOSE

In keeping with our vision of “We enable successful and socially responsible credit experiences by empowering customers through exceptional people, technology and data”, Recoveriescorp recognises that some of our customers due to their personal circumstances may require extra levels of care.

The purpose of this policy is to identify customers experiencing payment difficulties and to assist those customers to better manage their financial situation.

This policy provides our staff guidelines on how to effectively ensure that our customers are properly assisted in keeping with our vision as well as our obligations to our clients.

## SCOPE

This Policy forms part of recoveriescorp’s governance framework and applies to all controlled entities within the group that include (but not limited to) Recoveries Corporation Pty Ltd, Mason Black Lawyers Pty Ltd (MBL), RCL Services Pte Limited (RCL Services), ACN 135 458 141 Pty Ltd (formerly Nutun Finance Australia Pty Ltd) and Prushka Fast Debt Recovery Pty Ltd staff and contractors.

## INTRODUCTION TO HARDSHIP AND VULNERABLE CUSTOMERS

The process of dealing with hardship and vulnerable customers is a vital process and is to be dealt with in accordance with this policy, current legislations and with our company values always at the forefront of our processes. Recoveriescorp and our clients are committed to ensuring that genuine consideration is given to persons who are experiencing hardship.




We understand that sometimes in life people may face unexpected changes in their circumstances or have a misunderstanding of the financial commitment they have made and their capacity to honour this agreement. Our approach is to treat customers with courtesy and respect whilst we find a tailored solution for them.



## GUIDING PRINCIPLES

## OUR COMMITMENT

### PEOPLE FOCUS





At recoveriescorp, we uphold our company values at every stage of your hardship assistance. Our commitment to people-centric service means we:

-  Demonstrate integrity by handling hardship with honesty and transparency, ensuring fairness in all interactions with clients, customers, and stakeholders.
-  Continuously improve by challenging our assumptions and processes to provide more effective solutions, enhancing the overall hardship experience.
-  Take ownership of our performance, ensuring responsible and timely resolution of hardship and accountability for the outcomes of each case.

-  Embrace diversity by treating each individual with respect and understanding, appreciating unique perspectives and needs in every interaction.
-  Pursue excellence by setting and maintaining high standards in hardship management, striving to exceed expectations and earn trust from our customers and clients.

## APPLYING FOR ASSISTANCE

We understand that some people may feel uncomfortable discussing their financial situation. We prioritise making our hardship process accessible to all customers. Information on how to submit hardship assistance is readily available through multiple channels:

-  **Website:** Complete the "Contact Us" form on our website at [recoveriescorp.com.au](https://recoveriescorp.com.au)
-  **Telephone:** Speak directly with a representative at 1300 663 060
-  **Email:** Contact our Hardship Team at [hardship@recoveriescorp.com.au](mailto:hardship@recoveriescorp.com.au)
-  **In writing:** Send written complaints to PO Box 13159, Law Courts, Melbourne VIC 8010

## AUTHORISING SOMEONE ELSE TO HELP

Customers can appoint someone else to lodge or handle their hardship application on their behalf. This may be a family member or friend, a financial counsellor or a legal representative.

Customers will need to give appropriate authority for their representative to liaise with us. Once this authority is in place, we will work with the representative.

## ACCESSIBILITY

In the event a customer has difficulty communicating with us due to language barriers, we will seek the assistance of an interpreter such as the use of an interpreter service. Recoveriescorp is registered with the Translating and Interpreting Service (TIS), an interpreting service provided by the Department of Home Affairs.

We will also assist customers in using the Australian Sign Language (AUSLAN), assistance can be obtained through the government initiated National Relay Service (NRS). This free service can be accessed by contacting 133 677.

## RECORDING HARDSHIP

## CONFIDENTIALITY

We will protect the identity of people discussing their financial hardship where this is practical and appropriate.

Recoveriescorp is obligated to meet its requirements under the Australian Privacy Act as well as the Australian Competition and Consumer Commission (ACCC) and Australian Debt Collection Guidelines (DCG).

Accordingly, we do not disclose any information to customers prior to confirming points of identity. While we understand this can be frustrating for the customer, we are bound to follow the legislative and regulatory requirements to protect the privacy of our customers and clients.

## RECORDING PERSONAL INFORMATION

We will need to record, use and if necessary, share personal information to assess a customer's situation and eligibility for hardship assistance. We will seek the customer's consent before collecting, using or sharing any personal information.

We may also ask for supporting documents such as statements of current income, expenses, assets, liabilities or other documents to support the customer's situation.

We will also record all dates and times relating to actions taken to assist with hardship and communications between all parties involved. As part of our on-going improvement plan, hardship will be monitored for any identifying trends by management and rectification/remedial action taken to mitigate any identified issues.







## HARDSHIP FRAMEWORK

Recoveriescorp is committed to assisting customers who indicate they are experiencing financial hardship. This policy outlines the internal processes for managing hardship applications, ensuring a consistent and sensitive approach. Depending on the nature of the account and our agreement with the client, recoveriescorp may either manage the application directly or refer the customer to the client's hardship process.

## WHAT IS FINANCIAL HARDSHIP?

"Financial hardship" is when a customer is willing and has the intention to pay, but is unable to meet their repayments or existing financial obligations, and with formal hardship assistance their financial situation can be restored.

Financial hardship can be due to unforeseen circumstances or unexpected events, for example:

-  Unexpected changes in income and/or expenditure.
-  Changes in employment status (such as losing a job or a reduction in income).
-  Significant life events (such as a relationship breakdown or a death in the family).
-  Circumstances of financial abuse where the financial liability arose from a situation of family and domestic violence or financial difficulty being experienced by a person leaving a violent relationship.
-  Injury or illness.
-  Emergency event or natural disaster.

This policy is to ensure that relief is provided for persons experiencing hardship, and that the principles applied in the determination of hardship are consistent throughout the organisation.

## ALL STAFF

Staff at recoveriescorp are empowered to resolve hardship inquiries at the first point of contact whenever feasible. They are encouraged to engage directly with customers and third parties, addressing hardship and financial concerns promptly and efficiently, with the goal of achieving resolution during the initial interaction.

We adopt a practical and compassionate approach to resolution, treating each case with honesty, professionalism, and efficiency. Our team is committed to fostering customer satisfaction and trust, by acknowledging hardship situations immediately and responding with empathy and understanding.

Recoveriescorp takes pride in equipping staff with the knowledge and confidence to handle hardship inquiries effectively, ensuring customers feel supported and their concerns are addressed swiftly. This proactive approach reflects our dedication to building positive relationships and delivering the highest standard of care.

#### IDENTIFYING ISSUES AND VULNERABILITIES

All staff members are responsible for identifying and flagging instances of financial hardship, vulnerability, media risks, staff threats, or privacy concerns during hardship handling. These issues are documented in RCS to ensure that all relevant information is accessible for efficient resolution.

An automatic email notification is generated by RCS upon hardship lodging, driven by pre-set templates, to alert the relevant team or management, ensuring timely handling within established timeframes.

*Please refer to Section 6 – Vulnerability Framework*

#### REFERRING TO A CLIENT'S INTERNAL PROCESS

In cases where recoveriescorp operates on behalf of clients under specific instructions, we may lack the authority to make independent decisions. If the hardship falls outside our jurisdiction, we refer the matter to the client's hardship process and place the file on hold until further instructions are provided.

Any client specific processes with regards to dealing with vulnerable customers can be located in the team specific Wiki.















### VULNERABILITY FRAMEWORK

Recoveriescorp is committed to handling hardship professionally, efficiently, and in a way that meets regulatory standards. All recoveriescorp staff members are empowered to handle and understand if a customer may be vulnerable, and engage with the customer with sensitivity, dignity, respect and compassion and to take account of their particular needs or vulnerability to better support the customer.

#### UNDERSTANDING VULNERABILITIES

We know that vulnerability can look different for different people, and recent challenging times have reinforced that lesson. Training is provided to staff to increase awareness and understanding of common causes, signs and symptoms of vulnerability.

All staff members are responsible for identifying and flagging instances of financial hardship, vulnerability or self-harm threats. Vulnerability can come in a range of guises and can be temporary, sporadic or permanent in nature. A person's vulnerability may be due to a range of factors such as:

-  **Age** – Elderly, elder abuse or neglect, young, inexperienced
-  **Disability** – Intellectual disability, hearing or vision impairment
-  **Mental Health Conditions** – Mental illness and drug, alcohol and/or gambling addiction
-  **Physical Health Conditions** – Physical Injury, illness or limitation
-  **Financial Hardship** – Difficulty in meeting their financial obligations or paying debt
-  **Family Violence** – Physical, emotional, financial control, abuse, property damage
-  **Literacy** – Illiterate, limited ability to obtain and understand essential information
-  **Cultural** – Including but not limited to religion, ethnicity and background
-  **Language** – Where English is spoken as a second language
-  **Geographic** – Remote location or transport disadvantage
-  **Situational** – Bereavement, redundancy, relationship breakdown, incarceration, underemployed/reduced hours
-  **Financial Distress** – Financial problem or financial pressure where money worries are causing stress
-  **Natural Disaster** – Flooding, fire or any natural disaster outside their control
-  Any other personal or financial circumstances causing significant detriment

If a customer tells us about their vulnerability, or if we identify, we will work with them to achieve desired objectives for both the customer experiencing vulnerability and recoveriescorp.

These issues are documented in RCS to ensure that all relevant information is accessible for efficient resolution. An automatic email notification is generated by RCS upon hardship lodging, driven by pre-set templates, to alert the relevant team or management, ensuring timely handling within established timeframes.

## IDENTIFYING VULNERABILITIES

We actively encourage our customers to talk to us if they feel they need support or are worried about their financial wellbeing, and we proactively reach out to customers where there may be indicators of financial stress or challenges.

Our aim is to continue to identify vulnerability as early as possible and open up conversations around it. We will continue improving how we measure our support and improve how it is provided.

We will provide refreshing training to better recognise the intersectional nature of circumstances and characteristics that might indicate vulnerability, and the risks and impacts of harm.






## INTERPRETER

We recognise that some of our customers may experience language barriers in communicating with our office. This section of the policy provides our staff guidelines on how to effectively ensure that our customers are properly assisted.

In order to facilitate an inclusive customer service, Recoveriescorp is registered with the Translating and Interpreting Service (TIS), an interpreting service provided by the Department of Home Affairs. All Recoveriescorp customers have an opportunity to communicate with us using this service and thereby ensure we are able to assist them effectively.



The below the procedural steps are to be followed:

-  Staff must first ask if there is someone available with the customer who can translate for them
-  See the possibility of utilising a Recoveriescorp interpreter (refer to the Internal Interpreter List available on Compass)
-  Call Translating and Interpreting Service (TIS) National on 13 14 50
-  Quote Leader's name and provide Client code: C940871
-  If an internal interpreter is used, note the file to reflect accurate, complete and up-to-date account of the conversation with the customer (with the assistance of the internal interpreter).

As part of our service to the customer and commitment to assisting vulnerable customers, recoveriescorp will bear the cost of arranging the interpreter service (TIS).

### TELETYPEWRITER (TTY) SERVICE

For customers who are deaf, hard of hearing and/or have a speech impairment, assistance can be obtained through the government initiated National Relay Service (NRS). If required, Recoveriescorp can utilise the Teletypewriter (TTY) to assist the customer. This free service can be accessed by contacting 133 677.

Recoveriescorp staff can contact the TTY service and provide the customer's contact number and a relay officer will contact the customer using the TTY device.

The TTY is a special piece of phone equipment which allows users to type or speak their side of the conversation, with a small display screen where the other person's response can be read. There is also a feature to listen to the caller's response.

Three types of TTY calls can be made through the relay service:

#### Speak and Read

The customer (NRS user) speaks directly to the other person (recoveriescorp staff member) and reads their responses—typed by a relay officer—on their TTY. The customer can also listen to the recoveriescorp staff member's response. The volume can be turned up or down.

#### Type and Read

The customer (NRS user) types their side of the conversation and reads the recoveriescorp staff member's responses—typed by a relay officer—on their TTY.

#### Type and Listen

The TTY can also be used by someone who has difficulty speaking on the phone but can hear adequately. The customer types their side of the conversation, with a relay officer reading the words out to the recoveriescorp staff member. The customer (NRS user) can then listen to the recoveriescorp staff member's reply directly on their phone.









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## MENTAL HEALTH

Financial health and mental health are closely linked. At recoveriescorp, we are committed to treating all individuals, including those with past or present mental health conditions, with fairness, dignity, and respect. We recognise that mental health challenges can impact a person's ability to manage financial obligations, and we aim to provide compassionate and tailored support to ensure the best possible outcomes. Our approach is grounded in understanding, empathy, and compliance with all applicable regulations.

We believe in creating a safe and supportive environment for our customers, promoting open communication, and offering assistance that reflects their unique circumstances.

Our team members are trained to recognise signs that a customer may be experiencing mental health challenges, which can include:

-  Mentioning stress, anxiety, depression, or other mental health conditions.
-  Expressions of confusion, hopelessness, or emotional distress.
-  Statements indicating difficulty coping with life or financial responsibilities.
-  Speaking in a noticeably slow, hesitant, or disorganised manner.
-  Repeating information or appearing forgetful.
-  Sudden changes in tone, such as becoming upset or irritable.
-  Audible signs of distress, such as crying, sighing, or trembling voice.
-  References to traumatic events (e.g., bereavement, job loss, illness).

We aim to build trust with our customers and ensure that those experiencing or recovering from mental health challenges receive the respect and assistance they deserve.








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## FINANCIAL DISTRESS

We understand that financial distress can happen to anyone and may arise from unexpected life events or changing circumstances. We are committed to working with customers experiencing financial difficulties to provide fair, respectful, and compassionate support.

Our goal is to help customers navigate their challenges by offering practical solutions tailored to their unique situation. We believe in open communication and strive to create a collaborative process to assist customers in regaining financial stability while meeting their obligations.

Recognising the signs of financial distress allows us to provide timely and effective support to customers. Key indicators include:

-  Customers disclose difficulty making payments or meeting financial obligations.
-  Expressions of stress, anxiety, or embarrassment when discussing finances.
-  References to significant life changes, such as job loss, illness, or family separation.
-  Hesitation or reluctance to engage in conversations about their financial situation.
-  Appearing confused, overwhelmed, or uncertain about their financial arrangements.
-  Frequent requests for extensions, payment plans, or deferrals.
-  Mention of reliance on financial assistance or borrowing from friends/family.

We believe that working together with customers in financial distress not only helps them find relief but also strengthens trust and fosters a positive path forward. At recoveriescorp, we are committed to being a partner in finding solutions and achieving long-term financial well-being.








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## FINANCIAL ABUSE

Financial abuse is a serious form of violence often linked to domestic and family violence. It involves patterns of control that exploit or sabotage an individual's finances, impacting their ability to acquire, maintain, or regain economic well-being. This abuse undermines financial security, independence, and self-sufficiency, leaving lasting impacts on those affected.

At recoveriescorp, we recognise the profound effects of financial abuse and are committed to providing a safe and supportive environment. We work to ensure affected individuals receive the assistance, understanding, and resources needed to regain control of their financial situation and rebuild their lives.

Our team is trained to recognise the signs of financial abuse, which may include:

-  The individual expresses concern or fear about discussing finances.
-  The customer mentions having no access to bank accounts, income, or financial decision-making.
-  The customer discloses that someone else controls their spending or takes their income without consent.
-  They seem unaware of debts in their name or financial obligations they allegedly owe.
-  References to domestic violence or controlling behaviour in personal relationships.
-  Situations where the individual appears hesitant to act without consulting someone else.
-  Requests to transfer financial control to another person without a clear or logical reason.







We support those affected by finance abuse by providing a safe, non-judgmental environment where individuals feel comfortable sharing their circumstances and reassuring them of confidentiality and our commitment to supporting them.

We are dedicated to identifying and addressing financial abuse with care and diligence. By working with affected individuals, we aim to empower them to regain their financial security, independence, and confidence for a brighter future.

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## ELDER ABUSE











Elder abuse violates an older person's basic right to feel safe. It is a controlling behaviour or action which frightens or intimidates and can be illegal. No older person should be subjected to any form of abuse, mistreatment or neglect. Elder abuse can take many different forms such as:

-  Physical abuse
-  Psychological/emotional abuse
-  Social abuse
-  Financial abuse
-  Sexual abuse
-  Neglect

The most common forms of elder abuse are financial abuse and neglect. Elder financial abuse is the illegal, mismanagement or improper use of the older person's finances. This includes stealing

money or possessions, controlling their finances without permission, threats or coercion to gain Power of Attorney or pressuring them for early inheritances.

It is critical to recognise the signs of elder abuse, particularly financial abuse and neglect, which are the most common forms. Indicators may include:

-  The older person seems nervous, hesitant, or avoids discussing financial matters.
-  Phrases like “I’m not sure I can say,” “I need to check with someone first,” or “I’m worried they’ll get upset.”
-  Uncertainty about recent transactions or account changes.
-  Inability to explain new debts, loans, or payments.
-  Comments suggesting someone else is managing their money or making decisions for them without consent (e.g., “My son handles all of that, and I don’t know what’s going on”).
-  Mentions of money going missing, bills not being paid, or property being sold without their knowledge.
-  Mention of feeling lonely, not having access to basic needs, or being unable to get assistance.
-  Disclosures of living conditions that may indicate neglect (e.g., “I can’t afford food this week” or “I haven’t been able to see a doctor”).
-  Someone else taking over the call or refusing to let the older person speak directly.
-  A third party showing controlling or dismissive behaviour during the conversation.





By staying attentive and proactive, our teams can play a crucial role in identifying and addressing potential elder abuse, ensuring older individuals receive the support and protection they need.




## FAMILY AND DOMESTIC VIOLENCE

Family violence is a pervasive issue that can have devastating impacts on individuals and families. It involves abusive or controlling behaviour by one person to harm, intimidate, or coerce another, often within intimate or family relationships. Family violence can take many forms, including physical, emotional, psychological, financial, social, or sexual abuse. It is never acceptable, and no one should feel unsafe in their home or relationships.



At recoveriescorp, we are committed to supporting individuals affected by family violence with compassion, respect, and confidentiality. Our aim is to recognise the signs of family violence, provide appropriate assistance, and connect those affected with the support they need to regain safety and stability.

Recognising family violence during phone interactions requires sensitivity and attention to verbal and behavioural cues. Signs may include:

-  The customer seems afraid, nervous, or reluctant to speak freely.
-  Frequent pauses, whispers, or changes in tone, as if they are being monitored.
-  References to controlling or intimidating behaviour, such as:
  - “They won’t let me do that.”
  - “I need to check with them first.”
  - “I’m not allowed to make decisions about money or bills.”
-  Indications of physical harm or threats (e.g., “I’m scared they might hurt me”).

-  Background noises or interruptions that suggest someone else is present and potentially controlling the conversation.
-  Does not want their physical address recorded.
-  Discloses the existence of any past or present family violence, or an intervention order or its equivalent.

We do not require evidence of an intervention order to trigger the requirements of the family violence policy.

-  The customer self-identifies to the staff member as being affected by family violence; or
-  The staff member identifies through the sorts of signs that the customer may be affected by family violence.




We encourage customers to tell us about their vulnerability so that we can work with them to arrange support, otherwise, there is a risk that we may not find out about it.

At recoveriescorp, we stand against family violence in all its forms. Our role is to ensure that those affected are treated with dignity, supported with care, and provided with practical solutions to navigate their circumstances.






## JOINT FACILITIES AND RELATIONSHIP BREAKDOWNS




At recoveriescorp, we understand that customers may enter into loans or other facilities jointly with one or more other borrowers which at times, can become challenging, particularly during relationship breakdowns or in situations involving family violence or financial abuse. These circumstances can cause significant stress and complex challenges for customers, and we are committed to providing compassionate and individualised support.

When dealing with issues arising from joint facilities we are expected to follow some general principles when engaging with customers in this situation:

-  Supporting customers individually while ensuring their safety and well-being, especially in situations involving family violence or abuse.
-  Safeguarding customer privacy by not sharing personal information between co-borrowers without consent, particularly when there are safety concerns.
-  Offering assistance without requiring customers to contact their co-borrowers for consent or information, recognising that this may not always be possible or appropriate.

Some of the complaints that could commonly occur from joint facilities include:

-  One borrower is pressured to enter into a loan which is not for their benefit, or they are unaware that a loan has been taken out in their name.
-  A guarantee is signed under duress, or else the guarantor was misled and did not understand what they were signing.
-  One borrower wants to split or sever a joint loan following a relationship breakdown, so that they become responsible for none or only part of the debt, but the other borrower does not agree.
-  One borrower is experiencing financial difficulty and requires hardship assistance, while the other borrower refuses to engage in any hardship discussions.
-  Co-borrowers disagree about how a joint debt should be repaid.

-  One account holder makes withdrawals or other transactions without the other account holder's knowledge or consent.
-  A customer's privacy is breached which may have serious consequences if family violence is involved.
-  One borrower's actions result in credit reporting and default listing of both co-borrowers.






It is important that we do not share current information about one borrower with the other borrower in the event a borrower is experiencing family violence as this may put the customer at further risk.

We must not require a customer to contact a co-borrower to obtain information or consent in relation to a request for assistance. Where there is a co-borrower who is not involved in the request for assistance and who is not contributing to the loan, then it would be inappropriate for us to ask for information about that co-borrower's financial circumstances.

We are committed to addressing these challenges with care, ensuring customers feel supported, safe, and empowered to manage their financial obligations.

#### NATURAL DISASTER OR EMERGENCY CIRCUMSTANCES

Our team supports all our customers and their communities, responding to catastrophes and natural disasters quickly, efficiently, professionally, and compassionately. We understand that every situation is different, and we have a range of solutions that can be tailored to meet our customer's needs. Recoveriescorp is committed to assisting customers who are affected by natural disasters and or emergency circumstances by:

-  Flagging accounts by postcode that have been declared areas of natural disasters.
-  Fast-tracking situations and, in most circumstances, placing accounts on hold immediately.
-  Ceasing all recovery and collection activities for a specific period ensures that customers have the time to sort out their affairs and get their lives back on track.
-  Reducing repayments within a specific period.
-  Deferring payments due within a specific period.

#### ASSISTING CUSTOMERS IN VULNERABLE CIRCUMSTANCES

Recoveriescorp is dedicated to supporting customers experiencing vulnerabilities with professionalism, sensitivity, and respect, ensuring compliance with regulatory standards. Our approach is grounded in empathy, collaboration, and tailored solutions to help customers overcome challenges while meeting their financial obligations.



When a customer discloses their vulnerability or when staff identify signs of vulnerability, we engage with them to provide tailored assistance. Information is documented in our system to ensure efficient resolution and continuity of support. Automated notifications alert relevant teams to prioritise and address such cases within appropriate timeframes.

We encourage customers to inform us if they are facing challenges and proactively reach out when financial stress indicators are present. Our aim is to foster early conversations around vulnerability and continually enhance the quality of our support.

Recoveriescorp staff will:




### Awareness and Understanding

We understand that vulnerability can take many forms, arising from factors such as mental health conditions, financial hardship, family violence, or natural disasters. Recoveriescorp actively fosters awareness through staff training, ensuring our team can identify and respond to a wide range of challenges that customers may face by:

-  Be aware of the prevalence and impact of vulnerabilities, including family violence, financial abuse, elder abuse, and mental health challenges.
-  Understand that customers may prefer to speak with staff of a specific gender or request additional support, such as involving an agent, lawyer, interpreter, or consumer representative.




### Identification and Engagement

Our staff are trained to recognise signs of vulnerability, whether through customer disclosures or observed behaviours. Once identified, we engage with customers empathetically, gathering relevant information to provide appropriate assistance. This includes documenting cases accurately in our system for continuity of care and efficient resolution. Recoveriescorp staff will:

-  Be alert to verbal, behavioural, and contextual signs of vulnerability during interactions, including those specific to family violence, financial abuse, elder abuse, or financial distress.
-  Engage with customers in a supportive and non-judgmental manner, using careful and sensitive communication.
-  Avoid requiring customers to repeatedly disclose their circumstances, recognising that this may be traumatising or unsafe.





### Confidentiality and Privacy

We respect the sensitive nature of information disclosed by customers and are committed to maintaining strict confidentiality and adhering to privacy laws. Our processes ensure that any information shared is handled securely and only used to provide necessary support.

-  Uphold strict confidentiality regarding all customer information.
-  Protect sensitive information, such as physical addresses, email addresses, or other personal details, ensuring access is restricted to authorised staff only.
-  Safeguard customer accounts and ensure that protections extend across all accounts we manage for the individual.

### Support Options

Recoveriescorp offers a variety of tailored support options to meet individual customer needs, such as payment arrangements, account holds, or referrals to external services like financial counsellors. We proactively provide solutions that help customers regain control over their financial situation by:

-  Working with customers to create flexible arrangements that accommodate their individual needs.
-  Allow customers to determine safe and preferred methods of communication, such as specifying times for calls or opting for email or text communication.
-  Provide customers with control over how their personal information is shared with other parties.
-  Facilitate easy appointment of authorised representatives or agents to act on behalf of customers when needed.

- 🌐 Work collaboratively with customer representatives and interpreters to ensure effective communication and understanding.
- 🌐 Refer customers to specialist services when appropriate, including family violence support services, financial counselling, elder abuse hotlines, or mental health resources.

### Escalations

Complex or high-risk situations are escalated to experienced staff or specialised teams to ensure customers receive the right level of care. This includes cases involving mental health crises, family violence, or financial abuse. Escalated cases are managed with urgency and sensitivity to minimise distress and resolve issues effectively.

We understand the importance of treating customers experiencing vulnerabilities with care and respect. Our internal policies are designed to:

- 🌐 Ensure all staff are trained to identify and respond appropriately to vulnerabilities.
- 🌐 Provide a seamless and supportive experience that prioritises customer well-being and safety.

Training in the Hardship and Vulnerable Customers Policy is part of induction, and ongoing training for all Recoveriescorp staff. All staff are trained to identify customers experiencing hardship, and to act with compassion and empathy whilst managing the situation within business requirements.

Recoveriescorp remains dedicated to providing a safe and compassionate service that supports customers through difficult circumstances, empowering them to regain control and stability.

## COMPLAINTS

Recoveriescorp is a member of the Australian Financial Complaints Authority's External Dispute Resolution Scheme.

We would appreciate if a customer would first allow us the opportunity to resolve the complaint through our Internal Dispute Resolution Scheme. Information on how to submit a complaint is readily available through multiple channels:




- 🌐 **Website:** Complete the "Contact Us" form on our website at [www.recoveriescorp.com.au](http://www.recoveriescorp.com.au)
- 🌐 **Telephone:** Speak directly with a representative at 1300 663 060
- 🌐 **Email:** Contact our Complaints Team at [complaints@recoveriescorp.com.au](mailto:complaints@recoveriescorp.com.au)
- 🌐 **In writing:** Send written complaints to PO Box 13159, Law Courts, Melbourne VIC 8010

If a customer remains dissatisfied with the final IDR response, they are informed of recoveriescorp's external dispute resolution (EDR) option via our membership with Australian Financial Complaints Authority (AFCA). Complaints can be lodged with AFCA in one of the following ways:

- 🌐 **Website:** [www.afca.org.au](http://www.afca.org.au)
- 🌐 **Telephone:** 1800 931 678 (free call)
- 🌐 **Email:** [info@afca.org.au](mailto:info@afca.org.au)
- 🌐 **In writing:** Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001

If the complaint relates to a privacy matter, the customer can contact the Office of the Australian Information Commissioner (OAIC):



-  **Website:** [www.oaic.gov.au](http://www.oaic.gov.au)
-  **Telephone:** 1300 363 992
-  **In writing:** Office of the Australian Information Commissioner, GPO Box 5218 Sydney NSW 2001

Please note there are time limits for lodging complaints with AFCA or OAIC, which are available by contacting each organisation directly.





## SUPPORTING RECOVERIESCORP STAFF MEMBERS

At recoveriescorp, we recognise that working with customers facing hardship and vulnerability can be emotionally challenging. We also understand that our team members may have experienced similar situations themselves, making this work even more personal and impactful.

We are committed to supporting the well-being of our staff by providing access to resources that promote mental health and resilience. This includes:

### Employee Assistance Program (EAP)

EAP is in place for all recoveriescorp staff and can be accessed via:






-  **Online:** <https://eapassist.com.au/assessment/>
-  **Phone:** 0407 086 000
-  **Email:** [support@eapassist.com.au](mailto:support@eapassist.com.au)
-  **Intranet:** under the 'People Performance & Culture' tab - EAP Assist.

Support is provided 24/7 through a confidential counselling service. The service assists in resolving personal and workplace issues before they adversely impact on well-being and performance. EAP Assist counsellors are there to support with a wide range of issues including stress, anxiety, depression, relationship issues, domestic violence and traumatic incidents in difficult situations. Supporting the mental health and wellbeing of our staff is a priority.



We value the dedication and empathy our team brings to their roles, and we are committed to creating a supportive environment where their well-being is prioritised.


## MANAGING UNREASONABLE CONDUCT

We are committed to being accessible and responsive to all people who approach us. Staff may at times find themselves having a difficult interaction that may include:

-  Abusive or obscene language
-  Angry or irate interactions
-  Distressed and emotional interactions
-  Threats of self-harm
-  Threats to others (Recoveriescorp staff, clients or members of the public)

At the same time recoveriescorp success depends on:

-  Our ability to do our work and perform our functions in the most effective and efficient way possible
-  The health, safety and security of our staff, and

 Our ability to allocate our resources fairly across all the complaints we receive.

At recoveriescorp, staff are aware of recoveriescorp's Health and Safety policies. Health and Safety issues should be placed in priority when staff are managing unreasonable or challenging hardship situations. For details, please refer to "H&S Policy Statement - v2.5" and "Health & Safety Policy & Procedures v2.5".

## SUPPORT SERVICES

We have support services available for anyone who is experiencing financial difficulties. Recoveriescorp currently has a wide range of support resources that are free and readily available.

## DEBT HELPLINES

**Financial Counsellors** can help people manage their finances more effectively and, if authorised to do so, can represent a customer in discussions with us. Where we can, we will refer customers, with their consent, to accredited financial counselling agencies who offer their help at no cost to the customer. The National Debt Helpline offers professional counsellors who can provide free and independent advice. Contact the National Debt Helpline on 1800 007 007.

**Mob Strong Debt Help** (support First Nation (Indigenous) Australians): tackles credit, debt and insurance matters for our First Nations Peoples. Contact the Mob Strong Debt Help line on free call 1800 808 488 (Mon. to Fri. 9.30am – 4.30pm).

## DOMESTIC & FAMILY VIOLENCE

**1800 Respect** is a 24-hour national, family and domestic violence counselling line for any Australian who has experienced, or is at risk of, family and domestic violence.

**QLIFE (LGBTIQ+)** is a telephone and online counselling service for LGBTI individuals impacted by domestic and family violence.

## GRIEF

**Australian Centre for Grief** provide counselling services for people experiencing loss and grief nationwide.

## REFUGEE SUPPORT

**Refugee Advice and Casework Service (RACS)** provides information and advice about refugee law and processes.

**Australian Red Cross** provides information about advocacy, relief and support services for vulnerable people in need and helps to connect migrants with essential support services.


## GOVERNMENT & LEGAL SERVICES

**MoneySmart (ASIC)** is an initiative by the Australian Securities and Investments Commission (ASIC). ASIC's free MoneySmart website has tips and tools to help you manage your money and seek support.

**Department of Human Services** provide information on Government initiatives and payments such as Centrelink, Medicare and Child Care.

**Government Crisis Payment** is a one-off payment if you've experienced an extreme circumstance and are in severe financial hardship.

## DEFINITIONS, ACRONYMS, ABBREVIATIONS

Acronyms/Definitions	Full Description
<b>Mental illness</b>	Australia's National Mental Health Policy defines a mental illness as 'a clinically diagnosable disorder that significantly interferes with an individual's cognitive, emotional or social abilities'. Reference: <i>Commonwealth Department of Health and Aged Care (2008), National Mental Health Policy</i>
<b>Financial Hardship</b>	Financial Hardship means a customer has difficulty meeting their financial obligations to us/our clients.
<b>Elder abuse</b>	Elder abuse is "a single, or repeated act, or lack of appropriate action, occurring within any relationship where there is an expectation of trust, which causes harm or distress to an older person."
<b>Family violence</b>	Violent, threatening or other behaviour by a person that coerces or controls a member of the person's family... or causes the family member to be fearful." Reference: <i>Family Law Act 1975 (Cth), section 4AB</i>
<b>TIS</b>	Translating and Interpreting Service
<b>IDR</b>	Internal Dispute Resolution
<b>EDR</b>	External Dispute Resolution
<b>AFCA</b>	Australian Financial Complaints Authority
<b>FSCL</b>	New Zealand Financial Services Complaints Limited
<b>Complaint</b>	ASIC RG 271 Internal dispute resolution defines complaint as:  An expression of dissatisfaction made to an organisation, related to its products or services, staff or the handling of a complaints where a response or resolution is explicitly or implicitly required. According to RG 271.30, a proactive approach needs to be taken to identify complaints. There are no requirements for the customer to use the words 'complaint' or 'dispute' or other requirements to put this in writing
<b>RG96 Debt collection guideline (DCG)</b>	The guideline applies to both creditors who are directly involved in debt collection and to specialist external agencies who provide debt collection services.

## DOCUMENT HISTORY

Vers. No.	Date	Author	Change Description History	Approved / Endorsed by	Date Approved
1.0	25/03/20	Ishani Navaratna	Original document. This document supersedes the Hardship Policy v1.6 and Interpreter Service v1.0 incorporated into the vulnerable customer policy.	Nicholas Harrak	09/04/20
1.1	12/02/21	Ishani Navaratna	Section 1 – overview and purpose, range of vulnerability factors expanded Section 2 – scope updated Section 6 – Hardship identification added Section 11 – Reference, reference to Customer Compliments, Complaints and Information Access Requests added	Lyndon Miranda	12/02/21
1.2	18/02/21	Susy Del Giudice	Added joint facilities	Daniel Greenhoff	18/02/21
1.3	23/02/23	Hannah Cook	Updated some language, process items, update to Interpreter Service, RCL's vision and removed external support. Updated Scope.	Daniel Greenhoff	07/03/23
1.4	17/10/23	Praveena Sukesh	Renamed policy as 'Hardship and Vulnerable Customer Policy' Scope updated to include Nutun Finance	Aisling Butterworth	20/11/23
1.5	16/05/24	Praveena Sukesh	Scope updated. Amended Mason Black & Mendelsons Lawyers to "Mason Black Lawyers Pty Ltd"	Aisling Butterworth	16/05/24
2.0	23/01/25	Stacey Mitchell	Full review and rewrite of the Hardship and Vulnerable Customer Policy to ensure alignment with current regulatory requirements, organisational processes, and best practices.	Aisling Butterworth	23/01/25