Complaints Policy

OUR COMMITMENT We encourage concerns to be raised early. Every complaint will be treated seriously, respectfully, impartially and without disadvantage to the complainant.

1. Purpose

Aravanis Insolvency Pty Ltd (Aravanis) aims to conduct every personal insolvency administration in accordance with high ethical and professional standards, in accordance with applicable legislation and regulatory guidance, and with proper regard to the interests of creditors, bankrupts and other stakeholders.

This policy provides an accessible, fair and timely process for raising and resolving concerns about our services, conduct, costs, delays, communications or administration of a bankrupt estate. It does not remove or restrict any right to complain to the Australian Financial Security Authority (AFSA), request a statutory review, seek professional advice or apply to a court.

2. Scope and definition of a complaint

A complaint is an expression of dissatisfaction by a bankrupt, creditor, client, employee, government agency or other stakeholder about any aspect of Aravanis' activities, where a person expects a response or resolution.

Complaints may concern, for example: the way we performed our work; staff conduct or communication; delay; an administrative error; a perceived conflict of interest; trustee remuneration or expenses; an asset realisation; an income contribution assessment; an objection to discharge; a hardship decision; treatment of a proof of debt; privacy; or compliance with legal and professional obligations.

A request for information, a routine file enquiry, a disagreement that is not accompanied by dissatisfaction, or a statutory review request may not itself be a complaint. We will nevertheless identify the correct pathway and explain it to the person.

3. Principles

Aravanis will: encourage concerns to be raised; make the process accessible; accept oral, written and anonymous complaints; provide reasonable assistance; manage complaints confidentially; avoid actual or perceived conflicts in the review; give the complainant procedural fairness; provide reasons for outcomes; keep appropriate records; and use complaint trends to improve systems and training.

No person will be treated adversely merely because they made, assisted with or pursued a complaint in good faith.

4. Raising a concern with the file team

Where appropriate, a person may first raise the issue with the staff member or Registered Trustee responsible for the administration. The file team should attempt to clarify and resolve the concern promptly.

If the person remains dissatisfied, asks for formal review, or the issue is serious, systemic, recurring, sensitive or involves the responsible Trustee, the matter must be referred promptly to the Complaints Officer.

5. How to make a formal complaint

A complaint may be made by email, post, telephone or in person. It does not have to be in writing.

Contact details:

Email: complaints@aravanis.com.au

Post: Complaints Officer
Aravanis
PO Box H194
AUSTRALIA SQUARE NSW 1215

Telephone: (02) 8985 5155

The complainant should, where possible, provide their name and contact details, the estate name or reference, the events and dates involved, the people involved, relevant documents, and the outcome sought. If a complaint is made orally, Aravanis will make a written record and, where contact details are available, invite the complainant to confirm or correct the issues recorded.

Anonymous complaints will be considered to the extent that available information permits, although Aravanis may be unable to obtain further information or provide a direct response.

6. Complaints Officer and independence

The Complaints Officer is a senior person designated by Aravanis. Wherever practicable, the complaint will be handled by a person who was not directly involved in the events complained of.

If the complaint concerns the Complaints Officer, the appointed Registered Trustee or another person whose involvement may create an actual or perceived conflict, it will be referred to another suitably senior and independent person. Aravanis may obtain input from external legal advisers, an appropriately experienced insolvency practitioner, AFSA or a relevant professional body where appropriate.

7. Complaint handling process and timeframes

Aravanis will acknowledge a formal complaint within five business days. We will assess urgency, jurisdiction, conflicts, safety, privacy and whether the matter also engages a statutory review or court deadline.

We will investigate proportionately, which may include reviewing the administration file and correspondence, speaking with relevant personnel, requesting further information and considering applicable law, regulatory guidance and professional standards.

We aim to provide a detailed written outcome within 20 business days after receiving the information reasonably required to investigate. If this is not possible, we will explain the reason for delay, provide a progress update and nominate a revised response date.

The outcome will identify the issues considered, material findings, reasons, any corrective or remedial action, and relevant external escalation or review options. Urgent matters and matters involving statutory time limits will be prioritised.

8. Possible outcomes

Depending on the circumstances, Aravanis may provide an explanation or further information, correct an error, apologise, reconsider an administrative approach, improve a process, provide staff guidance or training, refer a matter for independent advice, or take other appropriate remedial action.

If a complaint concerns remuneration or expenses, Aravanis will review whether the amount claimed or drawn was properly authorised, adequately supported, reasonable and compliant with applicable requirements. Any applicable statutory review pathway will be explained. A complaint does not itself replace a statutory review request or court application.

9. AFSA complaints and Inspector-General reviews

A person may contact AFSA about the conduct of a registered trustee or possible non-compliance in a personal insolvency administration. A complainant does not have to complete the Aravanis process before approaching AFSA.

The Inspector-General in Bankruptcy may review certain decisions specified by the Bankruptcy Act 1966, including specified decisions concerning objections to discharge, income contribution assessments, hardship applications, supervised bank accounts and trustee remuneration or third-party costs. Statutory requests may be subject to strict requirements and time limits. Complainants should consult AFSA's current guidance and forms promptly.

AFSA does not have power to review every trustee decision. The complaint process and a statutory review are different processes. Aravanis will not state or imply that lodging a complaint suspends a statutory deadline.

10. Court rights

The Federal Court of Australia and the Federal Circuit and Family Court of Australia (Division 2) may exercise bankruptcy jurisdiction under the Bankruptcy Act 1966, subject to the particular provision and relief sought. Certain matters may require or permit an application to the Court, including matters not reviewable by the Inspector-General.

Examples may include challenges concerning an asset realisation or a decision to admit or reject a proof of debt, and applications concerning the conduct, decisions or administration of a trustee under applicable provisions of the Bankruptcy Act and the Insolvency Practice Schedule (Bankruptcy). The appropriate court, stading, procedure, evidence and time limit depend on the matter.

Aravanis cannot give a complainant independent legal advice. A person considering court action should obtain prompt independent legal advice. Making a complaint to Aravanis or AFSA does not necessarily extend or suspend a court or statutory time limit.

11. Privacy, confidentiality and records

Complaint information will be handled in accordance with applicable privacy, confidentiality and secrecy obligations. Information may be disclosed where reasonably necessary to investigate the complaint, obtain advice, comply with law, respond to AFSA or another authorised body, or protect legal rights.

Aravanis will maintain a Complaints Register recording the date, complainant, estate, issues, risk classification, handler, actions, outcome, external referral, systemic issues and closure date. Complaint records will be retained in accordance with applicable legal, professional and internal recordkeeping requirements.

12. Systemic issues and continuous improvement

Even where a complainant does not wish to proceed, staff must notify the Complaints Officer of any issue that may be systemic, serious, recurring or indicative of misconduct, control failure or legal non-compliance. Management will periodically review trends, overdue matters, root causes and corrective actions.

13. Responsibilities

All personnel must recognise complaints, respond respectfully, preserve relevant records and escalate matters under this policy. The Complaints Officer manages the process and register. The appointed Registered Trustee remains responsible for the administration and for ensuring appropriate responses to regulatory or court processes. Management oversees systemic remediation and annual review of this policy.

14. External contacts

Australian Financial Security Authority (AFSA): www.afsa.gov.au. AFSA provides information about complaints concerning personal insolvency practitioners and requests for review by the Inspector-General in Bankruptcy.

Federal Court of Australia: www.fedcourt.gov.au. Federal Circuit and Family Court of Australia: www.fcfcoa.gov.au. Court staff cannot provide legal advice.

Professional concerns may also be raised with a relevant professional body where applicable. This does not replace rights under the Bankruptcy Act 1966.

Document control

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2.0	September 2026	Director