

Internal Complaints Policy

ownly Limited and all agencies within the ownly REA license

Issued in compliance with Rule 12 — Real Estate Agents Act (Professional Conduct and Client Care) Rules 2012

Document Version	Version 2.0 — April 2026 (supersedes prior policy)
Governing Legislation	Real Estate Agents Act 2008 and Real Estate Agents Act (Professional Conduct and Client Care) Rules 2012, Rule 12
Supervising Agent	Keith Ward supervision@ownly.nz 027 288 8813
Applies To	All clients, customers, and members of the public dealing with ownly or its licensees

1. Legislative Requirements — Rule 12

Rule 12 of the Real Estate Agents Act (Professional Conduct and Client Care) Rules 2012 imposes the following obligations on real estate agencies:

- Rule 12.1: An agent must develop and maintain a written in-house procedure for dealing with complaints relating to real estate agency work carried out by the agent or by any licensee employed or engaged by the agent.
- Rule 12.2: An agent must take reasonable steps to make clients and customers aware of the in-house complaints procedure at the first reasonable opportunity.
- Rule 12.3: An agent must inform clients and customers that they do not have to use the in-house procedure and may make a complaint directly to the Real Estate Authority (REA) at any time.
- Rule 12.4 (implied by Rules 12.1–12.3 and REA guidance): The procedure must include a structured, fair, and prompt process with defined steps, timeframes for acknowledgement and response, escalation pathways, and a clear referral to REA.

This policy has been prepared to satisfy these requirements. All licensees employed or engaged by ownly are required to be familiar with and comply with this policy.

2. Your Right to Make a Complaint

Important Notice to Clients and Customers

You do not have to use ownly's internal complaints process. You may make a complaint directly to the Real Estate Authority (REA) at any time — before, during, or after using our internal process. Using our internal process does not prevent you from also making a complaint to REA.

ownly is committed to resolving complaints fairly, promptly, and professionally. We welcome feedback as an opportunity to improve our service. All complaints will be treated with respect and confidentiality.

You may make a complaint about any aspect of the real estate agency work carried out by ownly or any of its licensees, including:

- The conduct or behaviour of a licensee;
- The standard of service provided;
- The handling of a transaction;
- Any communication or disclosure concern; or
- Any other matter relating to real estate agency work.

3. How to Make a Complaint

You are encouraged to submit your complaint in writing wherever possible, as this helps us investigate fully and respond clearly. However, we will also accept verbal complaints and will document these on your behalf.

Contact Details — Complaints

Supervising Agent	Keith Ward
Email	supervision@ownly.nz
Phone / Cell	027 288 8813
Post	ownly Limited, 14 Aperahama Street, Paekakariki 5034

If your complaint concerns the Supervising Agent personally, please contact ownly's principal or a senior licensee directly so that the complaint can be handled without conflict of interest. Details are available on request.

4. Our Step-by-Step Complaints Process

The following process applies to all complaints received by ownly. All complaints will be handled fairly, confidentially, and without undue delay.

01	Acknowledge the Complaint Acknowledge receipt within two (2) working days of receiving the complaint — by phone, email, or letter. Confirm the complaint has been received and that it will be investigated fairly and promptly.
02	Gather Information Ask the complainant to provide all relevant details in writing, including any supporting documents or evidence. Seek clarification where needed to fully understand the nature of the complaint.
03	Investigate The Supervising Agent (or a senior licensee if the complaint involves the Supervising Agent) will investigate the complaint thoroughly. This may include reviewing relevant records, correspondence, and speaking with those involved.
04	Written Response

Provide a written response to the complainant within twenty (20) working days of receiving the complaint. If more time is required, advise the complainant in writing, with reasons and an updated timeframe.

05

Proposed Resolution

If the complaint cannot be resolved informally, provide the complainant with a written proposal to resolve the complaint. The complainant should respond within five (5) working days indicating acceptance or an alternative resolution.

06

Mediation (if required)

If the parties cannot agree on a resolution, ownly may invite the complainant to participate in mediation with a mutually agreed independent mediator. Costs of mediation will be agreed in advance.

07

Conclusion of Internal Process

If mediation does not resolve the complaint, or if either party declines mediation, the internal complaints process is concluded. The complainant retains the right to refer the matter to REA at any stage.

5. External Complaints Pathway — Real Estate Authority (REA)

As noted above, you may contact REA at any time regardless of whether you have used, are using, or intend to use our internal complaints process. REA is an independent government body that regulates the real estate industry and protects the interests of consumers.

REA can investigate complaints about the conduct of any licensed real estate salesperson, branch manager, agent, or agency. REA will assess whether the conduct may constitute a breach of the Real Estate Agents Act 2008 or the Code of Conduct (Professional Conduct and Client Care Rules 2012).

Real Estate Authority (REA)	0800 367 7322 info@rea.govt.nz www.rea.govt.nz
Complaints Assessment Committee (CAC)	Serious complaints may be referred by REA to a Complaints Assessment Committee (CAC) for formal determination. The CAC can make findings of unsatisfactory conduct or misconduct.
Real Estate Agents Disciplinary Tribunal	CAC decisions may be appealed to the Real Estate Agents Disciplinary Tribunal, an independent body with the power to make binding decisions including suspension or cancellation of a licence.

6. Record Keeping and Confidentiality

Record Keeping

ownly will maintain a written record of all complaints received, including:

- The date the complaint was received;
- The name and contact details of the complainant;
- A summary of the complaint;

- The steps taken to investigate and resolve the complaint;
- The outcome and any resolution reached; and
- Any referral to REA or other external body.

Complaint records will be retained for a minimum of three (3) years, consistent with REA practice, and may be retained for longer where required by law or where proceedings are ongoing.

Confidentiality

All complaints will be handled confidentially. Personal information about complainants and any licensees involved will only be disclosed to the extent necessary to investigate and resolve the complaint, or as required by law. This is consistent with Rules 9.16 to 9.18 of the Code of Conduct.

7. Notifying Clients and Customers of This Policy

In accordance with Rule 12.2, ownly will take reasonable steps to make all clients and customers aware of this complaints policy at the first reasonable opportunity. This will be done by:

- Providing a copy of this policy, or a written summary of it, to clients at the time of signing an agency agreement;
- Making this policy available on request at any ownly office;
- Including a reference to this policy in ownly's standard client correspondence and on its website; and
- Ensuring all licensees are familiar with this policy and can direct clients and customers to it.

All licensees employed or engaged by ownly are required to be familiar with this policy and to comply with it at all times. Questions about this policy should be directed to the Supervising Agent, Keith Ward, at supervision@ownly.nz.

This policy was prepared in April 2026 and complies with Rule 12 of the Real Estate Agents Act (Professional Conduct and Client Care) Rules 2012. It should be reviewed annually or whenever there is a change in relevant legislation or REA guidance. This document does not constitute legal advice.