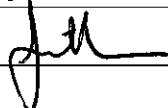


## Fair Dealing Policy

November 2016

### Version History

Version	Date	Amendments	Changes made by
1	18/11/2016	New document	Directors
2	27/10/2017	General updates	Johanna Bloemendal
3	24/10/2018	Annual review	Johanna Bloemendal

Discussed at Board meeting (date)	28 Nov 2018
Approved (Signed)	

Capitalised words and phrases are defined in the Glossary which is part of our **General Terms and Conditions**.

### **Policy**

Southern Cross Partners has processes and procedures to establish the suitability and appropriateness of both Borrowers and Investors using our services.

These processes and procedures are used to determine if we will:

- allow a Borrower to raise funds through our Platform; or
- allow an Investor to invest in Loans offered on the Platform.
  
- To be accepted as a Borrower, the applicant must: provide us with all information as set out in the application process on our website at [www.southerncrosspartners.co.nz](http://www.southerncrosspartners.co.nz) and in the **Service Disclosure Statement**, including the completed **Borrower Application Form** (indicative sample only);
- undergo credit checks and assessments; and
- provide any other information that is requested by us.
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To be accepted as an Investor on the Platform, the applicant must complete the **Investor Application Form** and:

- provide all of the information required in the **Investor Application Form**;

- complete our verification process in relation to their identity and personal information to our satisfaction; and
- meet any other requirements notified by us from time to time

We retain absolute discretion in any determination of suitability and appropriateness of any Borrower or Investor.

We reserve the right (in our **General Terms and Conditions**) at any time to:

- exclude a Borrower or an Investor from using any aspect of the service;
- suspend or terminate the participation of any Borrower or Investor; and
- limit, in any respect, a Borrower's and Investor's use of the Platform,

if we have information that gives us any reason to believe that, a Borrower or an Investor in relation to any use of the Platform, has:

- engaged in conduct that is misleading or deceptive or likely to mislead or deceive;
- made a false or misleading representation in contravention of section 22 of the FMCA;
- made an unsubstantiated representation in contravention of section 23 of the FMCA;
- wilfully omitted any information that would influence our assessment of a Borrower's application, and/or proposal or an Investor's decision to invest; or
- otherwise breached our **General Terms and Conditions** as detailed on our website [www.southerncrosspartners.co.nz](http://www.southerncrosspartners.co.nz)

### **Implementing our Fair Dealing Policy**

We have processes for carrying out our Fair Dealing Policy which are a combination of automated and manual checks.

Borrowers are required to provide personal information and undergo credit checks before we review and assess their application.

During our assessment of a Borrower's application, we check the financial information provided to us by the Borrower for 'reasonableness' and may require tangible evidence of income. We also check the valuation of the security property that is to be provided in relation to the Loan being sought. This is undertaken by reference to public records and by the use of available external reports as we see fit.

If we discover any information which is not consistent with the information provided to us by, or on behalf of the Borrower, we will seek clarification of this from the Borrower and/or the Financial Adviser submitting the application for finance on the Borrower's behalf.

Ultimately if we are not satisfied with any information or explanations provided, we will not approve the Borrower's application and we may also exercise our discretion to exclude or limit the Borrower's use of our service. These decisions are made by a member of our Senior Management Group.

Borrowers are not permitted to provide pitch documentation or have any direct contact with prospective Investors or Investors in the Loan. Borrowers will not have any opportunity to influence

the information that we elect to make available on the Platform. This will remain our sole discretion subject to adherence to our Privacy Policy.

### **Review**

This policy will be reviewed regularly, and at least annually, to ensure this policy is relevant and details are current.

