



Delphi Investment Group Pty Ltd

Dispute and Refund Policy

Delphi Investment Group Pty Ltd ACN 672 188 546

Document Control

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1. Introduction

We strive to provide our customers with the highest level of service and transparency. This Dispute and Refund Policy outlines the procedures for resolving disputes and processing refunds related to our remittance services.

2. Scope

This policy applies to all transactions made through our remittance services, where the funds are transferred from China to Australia.

3. Dispute Resolution Process

3.1 Initiating a Dispute

- Customers must report any issues or disputes related to their transactions within 3 days of the transaction date.
- Disputes can be reported by contacting our customer service team via email, phone, or through our website's contact form.
- When reporting a dispute, customers should provide the following information:
 - Transaction reference number
 - Date of the transaction
 - Amount of the transaction
 - Detailed description of the issue

3.2 Investigation

- Upon receiving a dispute, we will acknowledge receipt within 48 hours.
- Our team will conduct a thorough investigation, which may include reviewing transaction records, contacting involved parties, and gathering additional information.
- The investigation process may take up to 28 business days, depending on the complexity of the dispute.

3.3 Resolution

- After completing the investigation, we will notify the customer of our findings and the resolution.
- If the dispute is found to be valid, we will take appropriate corrective actions, which may include reversing the transaction, providing a refund, or offering other suitable remedies.
- If the dispute is found to be invalid, we will provide a detailed explanation of our decision.

4. Refund Policy

4.1 Eligibility for Refunds

- Refunds are only available for transactions that have not yet been completed or processed.
- Transactions that have been successfully transferred and received by the beneficiary are not eligible for refunds.

4.2 Refund Request Process

- Customers may request a refund by contacting our customer service team.
- Refund requests must be made within 3 days of the transaction date.
- The following information is required to process a refund request:
 - Transaction reference number
 - Date of the transaction
 - Amount of the transaction
 - Reason for the refund request

4.3 Processing Refunds

- Once a refund request is received, we will verify the transaction details and the eligibility for a refund.
- Refunds may be processed up to 28 business days from the date of the request.
- Refunds will be issued using the original payment method used for the transaction.

- Any fees incurred during the transaction may not be refundable, depending on the circumstances of the refund.

5. Contact Information

For any questions or assistance regarding disputes and refunds, please contact our customer service team:

- Email: infor@delphiinvestment.com.au
- Phone: +61 451 097 787

6. Changes to This Policy

We reserve the right to update or modify this Dispute and Refund Policy at any time. Any changes will be communicated to customers through our website and other appropriate channels.

7. Governing Law

This policy shall be governed by and construed in accordance with the laws of the jurisdictions in which we operate.

Effective Date: 2024-06-10

Approved By: Xueliang YUAN

Position: Director of Delphi Investment Group Pty Ltd

Signature:





Delphi Investment Group Pty Ltd

Fraud Policy

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1. Purpose

The purpose of this Fraud Policy is to establish controls to prevent, detect, and respond to fraud effectively. This policy aims to protect Delphi Investment Group Pty Ltd (hereafter referred to as "the Company"), its assets, customers, and reputation against the risks associated with fraudulent activities.

2. Scope

This policy applies to all employees, contractors, agents, and third parties engaged with the Company. It covers all forms of fraud, including but not limited to misappropriation of funds, financial statement fraud, and corruption in connection with the Company's operations, particularly within the remittance services.

3. Definitions

- **Fraud:** Any intentional act committed to secure an unfair or unlawful gain, including deception, misrepresentation, theft, embezzlement, or misuse of Company resources.
- **Remittance Fraud:** Fraudulent activities specifically related to the transfer of funds, including money laundering, identity theft, unauthorised transactions, and misuse of customer information.

4. Policy Statement

The Company has zero tolerance for fraud and is committed to implementing robust controls to prevent and detect fraudulent activities. All employees are required to act with integrity and report any suspected fraudulent activities immediately.

5. Responsibilities

- **Board of Directors:** Responsible for overseeing the effectiveness of the Fraud Policy and ensuring the Company has adequate resources to combat fraud.
- **Management:** Implement internal controls and ensure that fraud prevention and detection measures are adhered to within their areas of responsibility.

- **Compliance Officer:** Monitors adherence to fraud prevention controls, conducts investigations, and reports findings to senior management.
- **Employees:** Must comply with this policy, participate in fraud prevention training, and report any suspected fraudulent activities.

6. Fraud Prevention Measures

- **Internal Controls:** Implementation of robust internal controls, including segregation of duties, approval processes, and regular audits.
- **Employee Screening:** Conduct thorough background checks on all employees, particularly those handling financial transactions or sensitive information.
- **Customer Due Diligence:** Adhere to strict KYC (Know Your Customer) and KYB (Know Your Business) procedures to verify the identity of all clients and prevent unauthorised or suspicious transactions.
- **Transaction Monitoring:** Automated systems are used to monitor transactions for unusual patterns or behaviours indicative of fraud, such as rapid or high-volume transfers.

7. Fraud Detection

- **Whistleblower Mechanism:** Maintain a secure, anonymous reporting channel for employees, customers, and third parties to report suspicious activities.
- **Regular Audits:** Conduct regular internal and external audits to detect discrepancies, irregularities, and any signs of fraudulent activities.
- **Data Analysis:** Utilize data analytics tools to identify anomalies or patterns that may suggest fraudulent activity.

8. Fraud Response

- **Investigation:** All reports of suspected fraud will be investigated promptly by the Compliance Officer, who will document findings and recommend corrective actions.
- **Reporting:** Significant fraud incidents will be reported to the Board of Directors and, where necessary, regulatory bodies such as AUSTRAC.
- **Disciplinary Action:** Employees found to be involved in fraud will face disciplinary action, up to and including termination of employment and legal proceedings.
- **Recovery of Losses:** The Company will take all reasonable steps to recover funds lost due to fraud, including legal action where appropriate.

9. Training and Awareness

- **Employee Training:** All employees will undergo regular training on fraud prevention, detection, and reporting procedures.
- **Customer Education:** Inform customers about typical fraud schemes and how they can protect themselves when using the Company's remittance services.

10. Policy Review

This policy will be reviewed annually or more frequently if needed to ensure its effectiveness and alignment with industry standards and regulatory requirements.