

Complaints Policy

This Policy sets out how Lancashire Underwriting Australia Pty Ltd (LUA) will handle complaints and our internal dispute resolution (IDR) system. It takes into account the nature, scale and complexity of LUA's business.

1. BACKGROUND

1.1 Introduction

LUA recognises the importance of having an effective internal dispute resolution system and acknowledges will ensure that;

- (a) it provides necessary assistance to the complainant to lodge a complaint;
- (b) all complaints will be handled in a fair and transparent manner;
- (c) it will only request and review information relevant to the complaint; and
- (d) where an error or mistake is identified on the handling of the claim, we will initiate action to correct it.

1.2 Complaint definition

An expression of dissatisfaction made to or about LUA, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.

2. COMPLAINTS PROCESS

2.1 Receiving a complaint

- (a) Complaint sent to complaintsreporting@lancashiregroup.com
- (b) The employee receiving the complaint should document in detail the nature of the complaint, attaching where appropriate all supporting documentation.
- (c) The following details are required to be recorded:
 - (i) name of complainant;
 - (ii) date complaint received;
 - (iii) policy and Claim No; and
 - (iv) nature of complaint.

2.2 Responding to complaints within appropriate time frames.

- (a) LUA will acknowledge the complaint within 24 hours (or one business day) of receiving and provide the name and contact details of the person reviewing the complaint

- (b) Lloyd's UK is notified of complaints received and outcomes using the Lloyd's Australia Notification Spreadsheet. Details of complaints received are forwarded to Lloyd's UK, via the complaints-notification@lloyds.com email address, within five business days of receipt and an update of the Notification Spreadsheet with the outcomes is forwarded within two business days of the outcome.
- (c) A Stage One review must be completed within ten business days of the complaint being received unless an extension from Lloyd's Australia is granted.
- (d) If the Stage One review resolves the complaint to the customer's satisfaction, the complainant is issued a response using the Stage One Resolution Letter, which sets out details of any redress or remedial action being offered.
- (e) If the Stage One review resolves the complaint within five business days, a Resolution Letter does not need to be sent to the complainant, unless:
 - o The complainant requests it; or
 - o The complaint relates to:
 - o a claim denial;
 - o the value of a claim; or
 - o financial hardship.
- (f) If the Stage One review does not resolve the complaint to the customer's satisfaction within ten business days, the complaint is auto-escalated to Lloyd's Australia by email at IDRAustralia@Lloyds.com for a Stage Two review. The customer is sent a letter, advising that the complaint has been elevated to Lloyd's Australia.
- (g) All complaint outcomes must be included on an updated version of the Lloyd's Australia Notification Spreadsheet by LUA and forwarded to the Lloyd's UK Complaints Team within two business days of the Stage One outcome or where a complaint is auto-escalated to Stage Two.
- (h) The Stage Two IDR response should be sent to a complainant no later than 30 calendar days after receiving the complaint.
- (i) Further details can be found here <https://www.lloyds.com/en-au/resources-and-services/make-a-complaint/policyholder-complaint/international-complaints/australia>

2.3 IDR Response

An 'IDR response' is a written communication to the complainant, informing them of:

- (a) the final outcome of their complaint at IDR (either confirmation of actions taken by the firm to fully resolve the complaint or reasons for rejection or partial rejection of the complaint);
- (b) their right to take the complaint to the Australian Financial Complaints Authority (AFCA) if they are not satisfied with the IDR response; and
- (c) the contact details for AFCA.

2.4 External dispute resolution

AFCA's details are as follows:

- (a) Online: www.afca.org.au
 - (b) Email: info@afca.org.au
 - (c) Phone: 1800 931 678
 - (d) Mail: Australian Financial Complaints Authority GPO Box 3
Melbourne VIC 3001
- And
- (e) IDRAustralia@lloyds.com

2.4 Complaints Register and Claims Denied Register

- (a) The Chief Compliance Officer will keep a register of all complaints.

3. REVIEW AND AMENDMENTS TO THIS POLICY

The Policy will be reviewed annually to ensure that it remains appropriate and relevant. Additional reviews will be triggered by major changes in corporate strategy, the regulatory environment, or financial market conditions.