

Internal Complaints Procedure

What is a complaint?

The PRA and the FCA define a complaint as:
“any oral or written expression of dissatisfaction, whether justified or not...about the provision of, or failure to provide, a financial service” where the complainant “has suffered (or may suffer) financial loss, material distress or material inconvenience”

Eligible Complainant

Eligible complainants are entitled to submit a request to Lloyd’s and/or the Financial Ombudsman Service should they remain dissatisfied with the decision.

Eligible complainants include policyholders who are private individuals and businesses with an annual turnover of less than EUR 2,000,000 and less than 10 employees.

Under the Lloyd’s and FOS schemes, there are no restrictions to an eligible complainant’s domicile, however more specific local rules and schemes may be applicable.

For All Assureds

If for any reason, you feel that we have failed to meet the high standards that we have set ourselves, we would like to know and would encourage you to follow the complaints procedure set out below.

□ Firstly, raise the issue either orally or in writing with the person at your broker’s office dealing with your insurance.

□ Within 5 business days of receipt by your broker he should have sent you a written acknowledgement advising you of the person who will be dealing with your concerns.

□ Within 20 business days we will provide you or your advisers with a written response unless the matter is sufficiently complicated to require further investigation, in which case we will advise you or your advisers of this in writing, with an explanation of why we cannot yet make a determination. We will also advise you of when you may expect our final response.

□ None of the above procedure in any way affects your right to legal advice or assistance or to seek assistance from your local insurance regulator.

If a complaint (as earlier defined) is received relating to any aspect of the claims handling procedure the following steps should be followed:

Claims Director and Claims Manager should be notified immediately of the details of the complaint.

The Claims Director and/or Claims Manager will be responsible for issuing a formal response to the complainant. This process should be carried out within a reasonable timescale depending on the nature and complexity of the claim.

Note: If the complaint is made by, or on behalf of, an eligible complainant domiciled in the UK, Lloyd's procedures require the formal response is issued within 2 weeks of the complaint's initial receipt.

For an eligible Lloyds complainant if it is likely that after 8 weeks the complaint will still not be resolved then a further letter should be sent to the complainant. At this point the complainant must be advised of their rights, as a possible eligible complainant, to further the complaint either to: - Lloyd's Policyholder and Market Assistance Department, if they have not already been involved in the complaints process; or - the Financial Ombudsman Service.

Investigation requirements

The complaint will be handled by the Claims Director and Claims Manager for review. The review shall consist of an initial file review followed by communication with Underwriters, claims staff, brokers, adjusters, professional advisers and others as the reviewer may consider necessary. The results of the review should be documented,

The Claims Director and/or Claims Manager will be responsible for issuing a formal response to the complainant. This process should be carried out within a reasonable timescale depending on the nature and complexity of the claim.

During the course of any investigation the parties shall take all reasonable steps to ensure that the complaint is handled with due care and diligence and that the complainant is kept informed of progress. Should an agreed course of action not be reached then the final decision will rest with the Managing Director.

Should Lloyd's or the Financial Ombudsman Service choose to carry out an independent review of the complaint and make a subsequent file request, the Compliance Officer and/or the Head of Claims shall endeavour to promptly provide:

- copies of all relevant files, papers, reports, notes of meeting etc. and any other information which may be requested;
- responses to complainant to date
- full assistance and cooperation with the investigation.

