

Complaints Policy

Note that this policy must be reviewed at least annually and needs to be signed off by Risk and Compliance Manager.

Policy Name	Complaints Policy
Policy Owner	Risk & Compliance Manager
Policy Executive Owner	SOOA
Version number	5.0
Approved by	Risk & Compliance Manager
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1. Purpose of Policy

This document details Domestic & General Insurance PLC's ("D&G") policy on dealing with complaints received from our customers, or someone on their behalf.

D&G is committed to providing consistently high-quality services, and although the majority of the time our services are provided to very high standards, we appreciate that sometimes things can go wrong. Complaints may arrive from a customer, or someone on their behalf, through any channels published for that purpose or through any other contact details or opportunities the complainant may have i.e. telephone, by post or email.

We welcome feedback from our customers, and complaints are a valuable source of information to help us to:

- Preserve our good relationship with current and future customers
- Maintain high levels of customer satisfaction
- Treat each case with the same standard practice to ensure fair and proper treatment
- Ensure our products and services live up to the expectations of our customers

The purpose of this policy is to ensure that all employees know;

- What a complaint is;
- The regulatory background and requirements relating to complaints, and
- What is expected from employees to ensure fair outcomes to customers

2. Statement of Policy

D&G's policies and procedures are the minimum standard for the manner in which we provide our services. These policies are designed to guide staff in carrying out their roles, assist staff to operate consistently, efficiently and compliantly, and specify requirements for reporting any compliance breaches.

D&G are committed to the effective management of complaints. D&G have adopted the definition of a complaint under AS ISO 10002:2006 as per ASIC (Regulatory Guide RG 165);

An expression of dissatisfaction made to an organisation, related to its products or services, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected.

It is essential that D&G have a clear, well-understood and documented policy and procedure to handle complaints and a central Complaints Register to record all customer complaints, in accordance with:

- Australian Standard ISO 10002:2006 Guidelines for complaint management in organisations
- Australian Securities & Investments Commission (ASIC) Regulatory Guide RG 165 – Licensing: Internal and external dispute resolution
- Australian Securities & Investments Commission (ASIC) Regulatory Guide RG 267 - Oversight of the Australian Financial Complaints Authority
- Corporations Act 2001(Cth)s912A(1)(g) & 912A(2)– Dispute Resolution System

D&G will ensure that the following principles prevail throughout the complaint handling process:

- demonstrate commitment to dealing efficiently and effectively with customer complaints;
- act with a focus on the customer and treat all customers with respect;
- take all reasonable steps to ensure there is no detriment to complainant;
- ensure that information on the complaint handling process is visible, accessible and transparent; and
- ensure no complainant is charged a fee.

3. Application of Policy

This Policy applies to all staff involved in the provision services for D&G.

For the purpose of this Policy, staff means:

- Anyone who conducts work for D&G in any capacity, whether this is full-time, part-time or casual, including temporary and contract workers.

Failure to comply with this Policy, our compliance obligations or Compliance Program more broadly, may be grounds for disciplinary action (such as termination of employment).

Any staff member who is knowingly or recklessly concerned in a contravention of the ASIC Act 2001 (“**ASIC Act**”) will not be indemnified by D&G.

4. Complaint Handling Guiding Principles

D&G will ensure it acts with a customer focused approach and commitment to resolving complaints by demonstrating visibility, accessibility, responsiveness, accountability, objectivity, confidentiality and continual improvement by applying these principles throughout the complaint handling process.

D&G will ensure that information about how and where a complaint may be made to or about the organisation is easily accessible to the public.

In applying this policy, D&G will:

- promptly acknowledge each complaint received, in a timely manner;
- prioritise complaints in accordance with the urgency of the issues raised;
- apply fairness and objectivity in the management of the complaint;
- ensure that all complaints are addressed in an equitable manner in accordance with this policy and the broader compliance obligations;
- ensure that relevant privacy laws and ethical obligations are complied with in relation to the use of personally identifiable information;
- take reasonable steps to ensure that complainants are not adversely affected because of a complaint made by them or on their behalf; and
- provide clear and relevant explanations to a complainant relating to expected timeframes, policy, procedures and decisions to minimise complaints and facilitate early resolutions for complainants before they become ongoing disputes.

D&G will monitor the complaint management system, the resources required and the data collected to assess the performance of the system and regularly audit the system to provide information on whether there has been compliance with the policy and the system is suitable to achieve the objectives.

5. Complaint Handling Process – The Stages and the Internal Duty to Report

D&G’s internal complaint handling process comprises the following stages:

- i. **Initiation** – the complainant contacts us by phone, email or letter and the complaint will be recorded on the register. The information included on the register must include the complainant’s contact information, issues raised by the complaint, the outcome sought by the complainant, any other information required to properly respond to the matter and any support requirements needed by the complainant. Complaints need not be in writing, we must provide simple and accessible arrangements for complainants.

- ii. **Acknowledgement** - prompt acknowledgement will be made as soon as practicable upon receipt of the complaint.
- iii. **Initial Assessment of Complaint** - to determine how a complaint should be managed (e.g. if it could be appropriately addressed with the complainant or if a formal investigation should be conducted), the complaint should be assessed against criteria, including the severity of the issue, complexity, impact on the individual, the public and D&G, the potential for the dispute to escalate, the need for immediate action and the outcome sought by the applicant.
- iv. **Investigation** – a trained Complaints Handling Officer will investigate the complaint in a timely manner in accordance with prescribed time frames and will investigate through consulting with relevant personnel experts to ensure the complaint is addressed in an equitable, objective and unbiased manner.
- v. **Resolution** – the Complaints Handling Officer will conclude and prepare a final response in accordance within prescribed time frames and will, where possible manage and resolve all complaints at the first point of contact. The Complaints Handling Officer will ensure that any reasons for a decision address the specific issues by the complainant. If possible, the reasons should be recorded and should refer to relevant legislation, codes, standards or procedures.
- vi. **Communication** – the Complaints Handling Officer will ensure the complainant receives appropriate and timely communications throughout all stages of the process. The progress of each complaint should be tracked until the matter is finalised. Final response to a complaint must be provided to complainant within a maximum of 45 days. The communication must include the actions taken to respond to the complaint, the outcome of the complaint, the reasons for the decision, any remedy or resolution that will be offered and, if appropriate, any other remedies that may be available to the complainant (e.g. an internal or external review of the decision).
- vii. **Closing the complaint** – the steps taken to address the complaint, the outcome of the complaint and any follow up action will be recorded on the central register upon closing a complaint.

All staff must promptly report any customer complaints. The Complaint Handling Officer will ensure that the complaint is recorded on the register, assess the complaint and commence the investigation.

The Complaint Handling Officer will consult with D&G's Compliance Officer to determine whether the complaint constitutes a significant reportable breach under the *Corporations Act 2001*, taking into consideration the following factors:

- the number and frequency of similar previous incidents;
- the impact of the complaint /or cause of the complaint on our ability to supply the financial services;
- the extent to which the complaint / or cause of the complaint indicates that the compliance arrangements to ensure compliance with those obligations is inadequate; and
- the actual or potential financial loss, and any actual or potential customer detriment.

In the communication back to the complainant, it must provide that if the customer is dissatisfied by the outcome of an internal assessment, the complainant may be able to escalate the dispute to an external body (if applicable). For example, in relation to complaints regarding insurance products, the complainant must be informed that D&G is a member of the Australian Financial Complaints Authority's (AFCA) External Dispute Resolution (EDR) scheme and that the customer has the right, at no cost, to refer the complaint to AFCA. In such circumstances, contact information will be provided for AFCA (see below).

6. Central Register

The Complaints Register must be kept up to date to ensure D&G has adequate records in place to comply with its obligation to maintain records of customer complaints.

7. Compliance Obligations

7.1 Roles and Responsibilities – involvement of personnel at all levels of D&G is required to ensure this policy and supporting procedures are utilised when handling customer complaints.

- Senior Management is responsible for:
 - ensuring that this policy and related procedures are communicated and implemented;
 - that staff are adequately trained in the complaint management policy and procedures prior to dealing with customer complaints;
 - the appropriate resources are put in place to demonstrate commitment to dealing effectively and efficiently with customer complaints; and
 - reviewing the complaint management system to ensure the suitability and efficacy of the system, to address non-conformity with regulatory and other requirements, to identify and correct issues and evaluate potential changes to the policy and procedures.
- The Complaints Handling Officer is responsible for:
 - handling escalated complaints in the first instance, with a view to first point of contact resolution where possible;
 - escalation to the Manager responsible for EDR disputes (if appropriate);
 - ensuring the complaints register is maintained and information related to the complainant and the complaint is recorded and stored confidentially and securely;
 - analysis of causal factors (people, process, system) to determine the reason why the problem occurred to trigger the complaint;
 - ensuring that information about the complaints management system is available to staff and the public; and
 - preparation of reports for Senior Management on actions and decisions made in regard to complaints, significant complaints or systemic issues or trends and reporting to staff about issues of concern identified in the complaint handling process.

7.2 Commitment - to demonstrate commitment to the efficient and effective handling of customer complaints D&G has:

- adopted the definition of a complaint in accordance with Australian Standard AS/NZS 10002:2014 - Guidelines for complaint management in organisations;
- incorporated the guiding principles into this policy;
- incorporated the prescribed timeframes into the documented business procedures;
- documented the complaints handling process for consumers in the combined FSG and PDS (which is also available on the website);
- assigned responsibility to certain personnel to manage the handling of complaints in accordance with the management systems and reporting procedures it has put in place.

7.3 Responsiveness - the complaint must be resolved in a timely manner, in accordance with prescribed time frames:

- complaints or disputes will be responded to promptly, in accordance with the urgency of the complaint or dispute
- The pursuit of 'best practice' procedures should result in shorter time frames regularly being achieved
- Maximum IDR time frames for Financial Services – 45 days (calendar) for final response.

7.4 External Dispute Resolution - The complainant may be able to escalate the dispute to an external body (if applicable). For example, in relation to insurance related complaints, the complainant may contact AFCA:

Free call: 1800 931 678

Post: GPO Box 3, Melbourne, VIC 3001

Website: www.afca.org.au

Email: info@afca.org.au

7.5 Continuous Improvement – D&G will ensure that appropriate operational and compliance arrangements are in place to prevent recurrence of the complaint by undertaking specific remedial action, including, but not limited to:

- Monitoring of the implementation of outcomes following closure of complaints;
- Conducting process reviews;
- Reviewing and revision of procedures;
- Strengthen existing compliance measures; and
- Improve systems and controls;

8. Consequences and Penalties

All staff are expected to comply with this Policy and related procedures and processes.

In failing to comply with the regulatory and standard provisions for complaint handling, D&G puts at risk;

- its reputation;
- consumer, client and industry confidence;
- breaching other related legislative or regulatory requirements, industry codes and standards which may result in penalties to both individuals and the company.

9. Policy References

This policy is to read in conjunction with all other relevant internal policies and procedures, specifically:

- [Compliance Policy](#) – which defines D&G’s Compliance Program
- [Whistleblower Policy](#) – which defines D&G’s duties to whistleblowers

10. Further Resources

Contact one of D&G’s Complaints Handling Officers for assistance.

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