

COMPLAINTS & DISPUTES HANDLING POLICY

Epsilon Insurance Broking Services Pty Ltd (t/as Epsilon Underwriting Agencies) herein known as “Epsilon”.

As a valued client, we want you to tell us if any of our products or services have not met your expectations. We will investigate the complaint and answer your questions. We have a complaints and internal dispute resolution process to try to resolve them as quickly as possible.

SHOULD YOU HAVE AN ENQUIRY OR COMPLAINT

We seek to provide our clients with a professional and efficient service.

We are committed to resolving enquiries or complaints as quickly and as fairly as possible. Any enquiry or complaint relating to an insurance policy, a service, a claim or a related matter should be in writing and addressed in confidence to:

Attention: Complaints Officer
Epsilon Underwriting Agencies
Suite 1303, Level 13, 1 Market Street,
Sydney NSW 2000
Email: complaints@epsiloninsurance.com

Your complaint can be sent by post or by email.

Please include the following information:

- Name, address and telephone contact number of the policyholder.
- If you are not the policy holder; your interest in the matter together with your name, address and telephone contact number.
- Details of the policy or claim (including our reference number).
- An outline of the circumstances, together with your reasons for lodging the complaint and your expectations in respect of resolution.
- Copies of any supporting documentation.

If you have difficulties communicating effectively with us due to language barriers or limited literacy skills, please ask us about communication channels we can offer to assist, including translation, interpreting and additional accessibility services. We welcome the opportunity to discuss the types of assistance we can provide or facilitate if you require additional assistance to lodge a complaint.

WE WILL ENDEAVOUR TO RESOLVE THE MATTER QUICKLY

- Your correspondence will be acknowledged within 24 hours of receipt.
- We will respond to your complaint within ten (10) business days of receipt.
- In cases where further information, assessment or investigation is required we will agree reasonable alternative time frames. If we cannot agree, we will treat your complaint as a dispute.
- We will keep you informed of the progress of our response to your complaint every 10 business days and provide a decision within thirty (30) calendar days unless your complaint has been escalated.

COST OF REVIEW

There will be no cost to you for us handling your complaint. Mediation may incur costs which will be known to all participants prior to commencement.

COMPLAINTS HANDLING PROCEDURE

The following standards apply to all complaints handling.

1. You are entitled to make a complaint to us about any aspect of your relationship with us
2. We will conduct complaints handling in a fair, transparent and timely manner.
3. We will make available information about our complaints handling procedures.
4. We will only ask for and take into account relevant information when deciding on your complaint.
5. You will have access to information about you that we have relied on in assessing your complaint and an opportunity to correct any mistakes or inaccuracies.
6. We will notify of the name and relevant contact details of the Employee assigned to liaise with you in relation to your complaint at each stage of the complaints process.

In special circumstances or where a claim is being or has been investigated, we may decline to release information but we will not do so unreasonably. In these circumstances, we will give you reasons. We will provide our reasons in writing upon request.

Where an error or mistake in handling your complaint is identified, we will immediately initiate action to correct it.

Complaints that cannot be resolved by the Complaints Department may be referred to either Lloyds Australia Limited, the Insurers own IDR scheme or the Australian Financial Complaints Authority (AFCA). Further detail will be provided at the appropriate stage of the complaints process.

INTERNAL DISPUTE RESOLUTION

STAGE ONE

a. In respect of Lloyd's binder business

1. Your correspondence will be acknowledged within 24 hours of receipt.
2. We will notify Lloyds of your complaint within five (5) business days of receipt.
3. We will keep you informed about the progress of your complaint by responding within ten (10) business days.
4. When we respond to your complaint, we will respond in writing and will tell you about our decision in relation to the complaint and the reasons for our decision within ten (10) business days after receiving the complaint, provided we have all necessary information and have completed any investigation required.
5. In cases where further information, assessment or investigation is required we will let you know as soon as reasonably practicable within ten (10) business days and agree reasonable extension of time. If we cannot agree an extension of time or if resolution is unlikely, we are required to escalate your complaint to Lloyds.
6. If an extension of time is mutually agreed, we will keep you informed of the progress of our response to the complaint at least every ten (10) business days (up to 30 calendar days), unless it is resolved earlier, or you agree to a lesser timeframe.

b. In respect of other binder business

1. Your correspondence will be acknowledged within 24 hours of receipt.
2. We will keep you informed about the progress of your complaint by responding at least every ten (10) business days unless you agree otherwise.
3. In cases where further information, assessment or investigation is required we will let you know as soon as reasonably practicable ten (10) business days after receiving the complaint and agree reasonable alternative time frames. If we cannot agree, we will treat your complaint as a dispute and we will advise you of your right to take your complaint to Stage Two of the complaints process.
4. When we respond to your complaint in writing and will tell you about our decision in relation to the complaint including a confirmation of actions taken to fully resolve the complaint or reasons for rejection or partial rejection of the complaint within thirty (30) calendar days after receiving the complaint.

STAGE TWO

a. In respect of Lloyd's binder business

If resolution is not achieved with ten (10) business days and an extension is not requested, a complaint will be escalated to Lloyd's Australia and Lloyd's will be responsible for handling the IDR. We will notify you of the escalation and a copy of the Lloyd's "What to do if you have a complaint" brochure will be provided.

Lloyd's Underwriters' General Representative in Australia:

Lloyd's Australia Limited, Suite 1603 Level 16, 1 Macquarie Place, Sydney NSW 2000, Australia.

Phone: (02) 8298 0700

Facsimile: (02) 8298 0788

Email: ldraustralia@lloyds.com

b. In respect of other binder business

We will respond to your dispute in writing within thirty (30) calendar days giving:

1. Reasons for our decision including a confirmation of actions taken to fully resolve the complaint or reasons for rejection or partial rejection of the complaint or IDR notification of delay including reasons for the delay; and
2. Information about your right to take the complaint to AFCA if you are not satisfied with the decision including contact details for AFCA; and
3. Notify you of the time frame within which you must register your dispute with the external dispute resolution scheme.

EXTERNAL DISPUTE RESOLUTION

In the unlikely event that internal resolution stages do not resolve the matter for you are not satisfied with the way your complaint has been dealt with, you can take your complaint to AFCA for external dispute resolution:

1. Insurers subscribe to the independent external dispute resolution scheme administered by the Australian Financial Complaints Authority (AFCA).
2. The AFCA is available to customers and third parties who fall within the Terms of Reference of the AFCA Service.
3. External dispute resolution determinations made by a Panel, Adjudicator or Referee of AFCA are binding upon us in accordance with the Terms of Reference.
4. Where the AFCA Terms of Reference do not extend to you or your dispute, we will give you information about other external dispute resolution options that may be available to you.

AFCA contact details are as follows:

Australian Financial Complaints Authority Limited
GPO Box 3
Melbourne VIC 3001
Phone: 1800 931 678
Email: info@afca.org.au

Your complaint must be referred to AFCA within 2 years of the final decision, unless AFCA considers special circumstances apply. If your complaint is not eligible for consideration by AFCA, you may be referred to the Financial Ombudsman Service (UK) or seek independent legal advice.

