



Document:

Complaints & Disputes Resolution (Lloyds/Non-Lloyds)

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Aster Underwriting Pty Ltd (Aster / the Coverholder) is committed to meeting and exceeding our clients' expectations whenever possible and would like to know if your expectations have not been met.

What is a complaint:

General Insurance Code of Practice (GICOP): An expression of dissatisfaction made to us, related to our products or services, our staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected. A complaint also includes such expressions of dissatisfaction made about us on a social media channel or account owned or controlled by us, where the person making the complaint is both identifiable and contactable. ASIC Regulatory Guide 271 (RG271): An expression of dissatisfaction to or about an organization, 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.

You are entitled to make a complaint about any aspect of your relationship with Aster and we will attempt in good faith to resolve any complaint/dispute in a fair, transparent and timely manner.

The complaints process described below does not apply to your complaint if Aster has resolved it to your satisfaction by the end of the 5th business day after your complaint was received by Aster and you have not requested a response in writing. The exemption to the complaints process does not apply to complaints regarding a declined claim, the value of a claim or financial hardship.

This policy complies with the General Insurance Code of Practice.

Financial Hardship:

We will review any Financial Hardship application in accordance with Section 8 of the General Insurance Code of Practice and any applicable guidelines.

General Insurance Code of Practice:

The Insurance Council of Australia Limited has developed the General Insurance Code of Practice ("the Code"), which is a voluntary self-regulatory code. The Code aims to raise the standards of practice and service in the insurance industry.

Lloyd's has adopted the Code on terms agreed with the Insurance Council of Australia. For further information on the Code please visit www.codeofpractice.com.au.

The Code Governance Committee (CGC) is an independent body that monitors and enforces insurers' compliance with the Code. For more information on the Code Governance Committee (CGC) go to www.insurancecode.org.au.

Complaints and disputes

The following standards apply to all complaints handling.

- You are entitled to make a complaint to us about any aspect of your relationship with us
- We will conduct complaints handling in a fair, transparent and timely manner.
- We will make available information about our complaints handling procedures.
- We will only ask for and take into account relevant information when deciding on your complaint.
- 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.
- 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

If you have any concerns or wish to make a complaint in relation to this policy, our services or your insurance claim, please let us know and we will attempt to resolve your concerns in accordance with our Internal Dispute Resolution procedure. Please contact Aster Underwriting in the first instance to discuss or submit your complaint:

Aster Underwriting Pty Ltd

E: phils@asteruw.com T: + 61 7 5579 1660

M: Complaints Manager, Aster Underwriting Pty Ltd, PO Box 337, Surfers Paradise Qld 4217

To allow Aster to consider your complaint the following information needs to be provided (where available):

- Name, address, email and telephone number of the policyholder;
- Policy Number, claim number and product type;
- Name and address of the insurance intermediary through whom the policy was obtained;
- Reasons why you are dissatisfied and an explanation of the situation that led to the complaint; and
- Copies of any supporting documentation you believe may assist Aster in addressing your complaint appropriately.

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.

Stage One

In respect of Lloyd's binder business;

Your correspondence will be acknowledged within 24 hours of receipt, and we will notify Lloyds of your complaint within five (5) business days of receipt.

We will keep you informed about the progress of your complaint by responding within ten (10) business days.

When we respond to your complaint, we will respond in writing and we will tell you about our decision in relation to the complaint, and the reason/s for our decision, within ten (10) business days after receiving the complaint, provided we have all necessary information to hand and have completed any necessary investigations.

If further information, assessment or investigation is required we will advise you of this within ten (10) business days and agree a reasonable extension of time. If we cannot agree on an extension of time or if resolution is unlikely we are required to escalate your complaint to Lloyds. If however an extension of time is agreed we will keep you informed of the progress every ten (10) business days up to 30 calendar days unless it is resolved earlier or you agree to a lesser timeframe.

In respect of other binder (non-Lloyds) business;

Your correspondence will be acknowledged within 24 hours of receipt.

We will keep you informed about the progress of your complaint by responding at least every ten (10) business days unless you agree otherwise.

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 after receiving the complaint and agree reasonable alternative timeframes. 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 this process.

We will respond to your complaint in writing and we 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

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 Lloyds Australia and Lloyds will be responsible for handling the IDR. We will notify you of the escalation and a copy of the "Lloyds – What to do if you have a Complaint" Brochure will be provided. Lloyds representatives in Australia are;

Lloyd's Australia Limited,

Suite 1603 Level 16, 1 Macquarie Place, Sydney NSW 2000, Australia. Ph: (02) 8298 0700 Facsimile: (02) 8298 0788

Email: idlaustralia@lloyds.com

In respect of other binder business;

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

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

Information about your right to take the complaint to AFCA if you are not satisfied with the decision including contact details for AFCA, and notify you of the timeframe within which you must register your dispute with the external dispute resolution scheme.

External Dispute Resolution

You may refer your complaint to the Australian Financial Complaints Authority (AFCA), if your complaint is not resolved to your satisfaction within 30 calendar days of the date on which you first made the complaint or at any time. AFCA can be contacted as follows:

Telephone: 1800 931 678 Email: info@afca.org.au Post: GPO Box 3 Melbourne VIC 3001

Website: www.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 you can seek independent legal advice. You can also access any other external dispute resolution or other options that may be available to you.

Investigation of your complaint will not exceed 30 calendar days in total. If a final decision cannot be provided within 30 calendar days Lloyd's Australia will advise you of the reasons for such delay and your right to escalate the matter to AFCA.

If your complaint is not resolved in a satisfactory manner to you, you may refer the matter to either AFCA, where applicable, or the Financial Ombudsman Service Ltd (UK) depending on eligibility related to your policy. AFCA is an independent national scheme for Consumers in Australia, free of charge and aimed at resolving disputes between the insured and their insurance intermediary/insurer. AFCA can advise you if your dispute falls within their Rules.

Determinations made by AFCA are binding on the insurer/intermediary, where relevant. If you would like to refer your dispute to AFCA, you must do so within 2 years of the final decision from Stage 2. AFCA may consider a dispute lodged after this time if AFCA considers that exceptional circumstances apply.

After your dispute is lodged with AFCA (where applicable), they will contact Aster and/or Lloyd's and ask for a response from both parties. Response times requested by AFCA vary depending on the situation.

If AFCA advises you that their Rules do not extend to you or your dispute, you can seek independent legal advice or access any other external dispute resolution options that may be available to you. If your complaint is not eligible for AFCA, it may be eligible for referral to the Financial Ombudsman Service Ltd (UK). Any referral must occur within 6 months of the final decision.

The Financial Ombudsman Service Ltd (UK) contact details are:

T: 0300 123 9 123 or 0800 023 4 567
E: complaint.info@financial-ombudsman.org.uk
M: Financial Ombudsman Service, Exchange Tower, London E14 9SR
W: www.financial-ombudsman.org.uk