

Complaints & Dispute Handling Policy



Xenon Underwriting Pty Ltd ABN 14 626 485 078 AFSL No 517775 treats all complaints regarding the products and services that we provide seriously.

What Is A Complaint?

The General Insurance Code of Practice (GICOP) defines a complaint as 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.

Who Can Make A Complaint?

Any individual, guarantor or small business (as defined by s761G of the Corporations Act) can make a complaint. Those making a complaint (the 'complainant') are asked to follow our process, which is outlined below.

If You Have A Complaint

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

Complaints Officer
Xenon Underwriting Pty Ltd
PO Box 10
Capalaba Qld 4157
Phone: (07) 3823 1302
Email: enquiries@xenonunderwriting.com

Please include the following information:

- Name, address and telephone number of the policyholder
- The type of insurance policy involved
- Details of the policy concerned, including policy and or claim reference numbers
- Name and address of the broker through whom the policy was obtained
- Details of the reasons for lodging the complaint
- An explanation of what you would like us to do to correct the situation
- Copies of any supporting documentation

Costs

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 Process

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.

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- We will notify you of the name and relevant contact details of the Complaints Officer assigned to liaise with you in relation to your complaint at each stage of the complaints process.

Note:

- *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 and if requested, we will provide you our reasons in writing.*
- *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 Officer 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.*

Timeframes

We operate a two-stage Internal Dispute Resolution (IDR) process, per below.

Note: The day a complaint is received is known as day zero. Accordingly, if counting calendar days, 1 calendar Day means the calendar day after the complaint is received. Similarly, 1 business Day means the business day after the complaint is received.

Stage One

a. In respect of Lloyd's binder business

- Your correspondence will be acknowledged within 1 business day of receipt. You will also be provided the name and contact details of the person reviewing the complaint.
- 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 at least every ten (10) business days.
- When we respond to your complaint, we will do so in writing.
- We will tell you our decision and reasons for our decision within ten (10) business days of receipt, provided we have all necessary information and have completed any investigation required.
- 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 of receipt and agree a reasonable extension of time. If we cannot agree, or if resolution is unlikely, we are required to escalate your complaint to Lloyds.
- 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

- Your correspondence will be acknowledged within 1 business day 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.
- When we respond to your complaint, we will do so in writing.
- We will advise you our decision and reasons for our decision within thirty (30) business days of receipt, provided we have all necessary information and have completed any investigation required.
- 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 of receipt and agree a reasonable

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extension of time. 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.

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.
- Within 1 business day, we will notify you of the escalation, in writing, and provide you a copy of the Lloyd's "What to do if you have a complaint" brochure.
- You will also be provided the name and contact details of the person reviewing your complaint.
- The Stage 2 reviewer will provide you with a written decision which will:
 - Detail reasons for the decision; and
 - Inform you of your right to refer to the AFCA if unsatisfied.
- If the Stage Two review cannot be completed within 10 business days, you will be provided an update and then further updates every 10 business days (unless by explicit agreement).

Lloyd's Underwriters' General Representative in Australia

Lloyd's Australia Limited
Suite 1603
Level 16, 1 Macquarie Place
Sydney NSW 2000
Phone: (02) 8298 0783
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:

- 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;
- 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 time frame within which you must register your dispute with the external dispute resolution scheme.

External Dispute Resolution (EDR)

In the unlikely event that our Internal Dispute Resolution process does not resolve the matter or you are not satisfied with the way your complaint has been dealt with, you can take your complaint to the AFCA for external dispute resolution:

- Insurers subscribe to the independent external dispute resolution scheme administered by the Australian Financial Complaints Authority (AFCA).
- The AFCA is available to customers and third parties who fall within the Terms of Reference of the AFCA Service.
- External dispute resolution determinations made by a Panel, Adjudicator or Referee of AFCA are binding upon us in accordance with the Terms of Reference.
- 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.

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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

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