COMPLAINTS HANDLING PROCEDURE

Version update

V 1.0	11.2022	
V 2.0	11.2021	A. Odendaal
V 3.0	01.2026	A. Odendaal

1.0 Introduction

1.1 Post & Co (P & I) B.V., Post & Co (Belgium) B.V, Post & Co (Assekuranzkontor) GMBH is committed to treating its customers fairly and to consistently deliver excellent service. The company recognises that its customers are at the heart of its business and that the conduct of its staff is key to ensuring that those with whom it does business receive a positive experience in their dealings with the company.

1.2 Any complaints or negative feedback received from people and entities we do business with are taken very seriously and viewed as an opportunity to address concerns and improve the service offered.

1.3 The Compliance Officer will coordinate the handling and response to complaints and service-related feedback in conjunction with the relevant party and the Management Team, as appropriate. Overall responsibility for ensuring complaints and negative feedback are addressed.

2.0 Scope

2.1 This procedure describes how complaints are reported, considered and addressed if any party expresses dissatisfaction with any aspect of our service. The main aim of this procedure is to ensure that complaints are resolved promptly and effectively, and to minimise the likelihood of their recurrence.

3.0 Definitions

3.1 The term “complaint” as per the Financial Conduct Authority refers to any expression of dissatisfaction or criticism regarding any aspect of our service, either verbally or in writing and irrespective of whether it is justified or not. If in doubt as to whether or not something constitutes a complaint, staff should treat the matter as a complaint and follow this procedure.

3.2 The term “recipient” refers to the member of staff to whom the complaint is first made.

4.0 Responsibilities

4.1 Staff who deal directly with any third parties are responsible for following this procedure if a service-related complaint is made to them.

4.2 The recipient is responsible for recording details of the complaint by completing a Complaint Report and informing his/her manager and including the Compliance Officer in copy.

4.3 The Compliance Officer, working in conjunction with the relevant manager, is responsible for ensuring that the complaint receives satisfactory attention and that the Complaint Register, detailing action taken and any recommendations made, is completed.

4.4 The Management Team will review complaints, together with any correspondence and have insight in the final recommendation.

4.5 Complainants may refer their complaint to the relevant authorities if they are not satisfied with the way in which their matter has been dealt with.

4.6 A complaint can be withdrawn at any time by sending a letter or e-mail stating that the matter will no longer be pursued.

4.7 All PCI Staff will attend compulsory complaints handling training every two years with the exception of Underwriting and claims staff who will receive training on a yearly basis, either internally or via an external third party.

5.0 Procedure Detail

5.1 This procedure is to be followed each time a service-related complaint is made, irrespective of whether or not the recipient believes it to be justified.

5.2 It is important to remember that the complaint investigation process is a mechanism to improve Post & Co's quality of service, not a means of attributing blame.

5.3 Examples of service-related complaints may include (but are not limited to) unsatisfactory assistance, belated replies, inaccurate advice, erroneous documentation, delayed payments, incorrect invoicing, misdirected communications, conflicting personalities and unavailable staff.

5.4 The recipient of the complaint shall by close of business on the day of receiving the complaint, inform his/her manager, copying in the Compliance Officer, open a Complaint Report, appendix PCO1, complete the report, and give the original to their manager, together with any relevant documentation.

5.5 The Compliance Officer will acknowledge the complaint in writing within 24 business hours of its receipt and thereafter investigate the complaint in conjunction with the staff member concerned and his/her manager. Notice will be given to complaints which arises from a policy placed within the Lloyds market.

5.6 When the complaint is acknowledged a copy of our *Complaints Policy and Procedure* should be enclosed and the complainant informed that they may be able to refer the complaint to the relevant authority.

5.7 The Compliance Officer shall ensure that the complainant is kept informed of the progress of the resolution of the complaint by providing either a written explanation of the steps that have been taken towards resolution of the complaint or a final response to the complaint.

5.8 The Compliance Officer shall refer the matter to the Management Team for review and consideration before a final outcome is reached.

5.9 Should the complaint not have been resolved within the allocated timeframe as per our Complaints Register or as soon as possible if no time frame is stipulated, the Compliance Officer must continue to keep the complainant informed as to progress on the resolution of the complaint at regular intervals.

5.10 Once the complaint has been resolved the Compliance Officer must complete the Complaints Register. A copy of the Report shall be filed and kept in accordance with Post & Co Retention Policy.

5.11 The Compliance Officer shall refer the matter for discussion and finalisation at the next Management team meeting.

6.0 What should not be done

6.1 Staff should not be apprehensive about reporting complaints concerning themselves. It is recognised that no one is immune from making errors.

6.2 Commence or threaten to commence any legal proceedings on behalf of Post & Co or any affiliates.

6.3 Make any admissions, or take any action which may be prejudicial to the company's position in relation to any proceedings instituted.

7.0 Recording complaints

Records of complaints are maintained in:

- The Complaint Report as per attachment PCO 1;
- The Company Complaints Register;
- The Management Team meeting minutes

8.0 Relevant authority

8.1 If the complaint arises from a policy on insurance placed within the Lloyds market we will comply with the latest guidelines on the handling of complaints as published by Lloyds on https://www.lloyds.com/market-resources/complaints/complaints-handling.

8.2 Our aim is to ensure complaints are resolved constructively. Post & Co (P & I) B.V., being the head office of the Post & Co Group is affiliated with the Dutch Financial Complaints Authority (KIFID: het Financiële Klachteninstituut). If we have been unable to resolve your complaint to your satisfaction then you may address your complaint to:
KIFID
P.O. Box 93257
The Netherlands
Telephone +31 70 333 89 99
http://www.kifid.nl/

8.3 Clients of Post & Co (Belgium) who are based in Belgium and are of the opinion their complaint has not been resolved satisfactorily may address the complaint to:
Insurance Ombudsman
De Meeussquare 35
1000 Brussels
Belgium
Telephone +32 2547 58 71
https://www.ombudsman.as/fr/

8.4 Clients of Post & Co (Germany) who are based in Germany and are of the opinion their complaint has not been resolved satisfactorily may address the complaint to:
Ombudsmann für Versicherungen
Postfach 080632
10006 Berlin
Germany
Telephone +49 30 206058 99
https://www.versicherungsombudsmann.de/

9.0 International Complaints pertaining to Lloyds Binders

9.1 All complaints must be notified to Lloyd's complaints team with via secure API message for managing agents in scope for DEX messaging or via email to complaints-notification@lloyds.com using the appropriate notification spreadsheet that can be found on https://www.lloyds.com/resources-and-services/make-a-complaint/complaints-handling/international-complaints-handling.

9.2 Special notice should be taking for all International Complaints, please make use of the following platform: https://www.lloyds.com/market-resources/complaints/complaints-handling.

PCO 1

Complaint Report

FOR REPORTING SERVICE RELATED COMPLAINTS

Section A	
Date of complaint: Click here to enter a date.	**Written or verbal?** Choose an item.
Name of Organisation: Click here to enter text.	
Name of Complainant: Click here to enter text.	**Position:** Click here to enter text.
Recipient of Complaint: Click here to enter text.	**Department:** Click here to enter text.

Section B
Details of Complaint (attach relevant documentation if appropriate):
Recipient to complete Sections A & B and submit form to their manager