

# LLOYD'S UNDERWRITERS COMPLAINTS POLICY

Aircrew Insurance is a Business Name of Strategic Underwriting Pty Ltd (ABN 71 619 739 212 AFSL 554 636), referred to as 'Aircrew Insurance', we, 'us', or 'our' in this Policy). Aircrew Insurance and Lloyd's Underwriters treat all complaints regarding the products and services that we provide seriously. If you are dissatisfied in any way, then you may lodge a complaint using our complaints process.

Please note that Aircrew Insurance itself does not have complaints handling authority in respect of claims, these will be reported to Lloyd's upon receipt and follow the procedures detailed in this policy

## ABOUT LLOYD'S

Lloyd's is the world's specialist insurance and reinsurance market, bringing together an outstanding concentration of underwriting expertise and talent.

In Australia, Lloyd's is proud to be a member of the Insurance Council of Australia. Lloyd's has adopted the General Insurance Code of Practice, subject to certain specific qualifications. Aircrew Insurance is your Lloyd's intermediary ("the coverholder"). Aircrew Insurance and your claim administrator must also meet the requirements of the Code. You can obtain a copy of the Code at [www.codeofpractice.com.au](http://www.codeofpractice.com.au).

Lloyd's aim is to provide the highest service to our Australian policyholders and have developed procedures, applicable to the entire Lloyd's market, for the honest, fair and timely handling of complaints.

## WHAT IS A COMPLAINT?

A complaint is an expression of dissatisfaction made to or about an organisation, 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. This 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.

The Australian Financial Complaints Authority ('AFCA') has jurisdiction to review complaints from an 'Eligible Person', which is defined in its Rules to include:

- a) an individual or individuals (including those acting as a trustee, legal personal representative or otherwise);
- b) a partnership comprising of individuals – if the partnership carries on a business, the business must be a Small Business;
- c) the corporate trustee of a self-managed superannuation fund or a family trust – if the trust carries on a business, the business must be a Small Business;
- d) a Small Business (whether a sole trader or constituted as a company, partnership, trust or otherwise);
- e) a club or incorporated association – if the club or incorporated association carries on a business, the business must be a Small Business;

- f) a not-for-profit organisation or club – if it carries on a business, the business must be a Small Business unless the not-for-profit organisation or club is also a charity registered with the Australian Charities and Not-for-Profits Commission;
- g) a body corporate of a strata title or company title building which is wholly occupied for residential or Small Business purposes; or
- h) the policy holder of a group life or group general insurance policy, where the complaint relates to the payment of benefits under that policy.

## TRAINING AND MANAGEMENT OF COMPLAINTS

Employees with responsibility for complaints handling are required to complete Lloyd's Coverholder eLearning module and additional training as necessary. Aircrew Insurance staff handling complaints are properly resourced and provided with sufficient authority.

We are committed to identifying any recurring issues that may lead to a complaint, which could relate to product design, underwriting practices, claims handling, or customer service. Details of complaints are recorded and analysed by management every 6 months.

Where a customer raises a complaint, we investigate the root cause and seek to fix any wider issues. This root cause analysis is fundamental in prioritising our operational plans to improve the customer experience. This process is divided into the following phases.

1. Identifying Issues – Analyse complaint data to identify trends or recurring issues. Categorise complaints by type, root cause, and policy/product affected. Engage with employees and brokers for insights into underlying causes.
2. Conducting Analysis – Review processes, documentation, and communication associated with complaints. Involve relevant stakeholders to ensure a comprehensive understanding.
3. Review Frequency – Conduct 6 monthly reviews of complaint trends and root cause analyses. Perform immediate reviews for significant complaints or systemic issues.
4. Utilising the Information – Implement corrective actions (e.g. process improvements, training). Update internal controls and risk assessments. Share learnings with underwriting, claims, and compliance teams to prevent recurrence. Report findings to Lloyd's as required.

## HOW CAN WE HELP YOU?

You can make a complaint about any aspect of your relationship with us, including your policy or claim and our service, staff or handling of a complaint.

If you wish to make a complaint, please contact either Aircrew Insurance or the administrator handling your claim in the first instance.

They will attempt to resolve it in accordance with our Internal Dispute Resolution ("IDR") procedure, which complies with Code and ASIC guidelines, and our commitment below.

## STAGE 1 – COMPLAINTS HANDLING INTERNAL PROCESS

Should you have a complaint or dispute, please contact our Complaints Officer immediately:

### Aircrew Insurance

Email: [support@aircrewinsurance.com.au](mailto:support@aircrewinsurance.com.au)

Mail: Complaints Officer

PO Box 456

Grange QLD 4051

Phone: 1300 089 847

### Our commitment to you

As part of our IDR procedure, we will:

- Acknowledge your complaint in writing within one (1) business day of receipt providing you with the name and contact details of the person reviewing the complaint.
- Do our utmost to resolve the complaint to your satisfaction within 10 business days

- If we cannot resolve your complaint within 10 business days, we will provide updates every 10 business days, unless you agree to a different timeframe
- Provide a final decision within 30 calendar days of the date on which you first made your complaint
- If we cannot provide a final decision in this timeframe, we will tell you, in writing, the reasons for the delay and your right to take the complaint to the Australian Financial Complaints Authority (AFCA)
- Give you the information we relied on when making a decision about your complaint within 10 business days of you asking for it

Depending on the outcome of our review, we may refer your complaint to Lloyd's Australia, who will determine whether it will be reviewed further by their office or the Lloyd's UK Complaints Team.

## STAGE 2 – EXTERNAL LLOYD'S AUSTRALIA COMPLAINTS AND DISPUTE PROCESS

If we cannot resolve your complaint within 10 business days, we will escalate your matter to Lloyd's Australia, who will determine whether it will be reviewed by their office or the Lloyd's UK Complaints team. Lloyd's will usually require the following information:

- 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
- Details of the reasons for lodging the complaint
- Copies of any supporting documentation you believe may assist Lloyd's in addressing your complaint appropriately

Lloyd's contact details are:

### **Lloyd's Australia Limited**

Grosvenor House, Level 32, 225 George Street  
 Sydney NSW 2000 Australia  
 Telephone: (02) 8298 0783  
 Email: [ldraustralia@lloyds.com](mailto:ldraustralia@lloyds.com)

## AUSTRALIAN FINANCIAL COMPLAINTS AUTHORITY (AFCA)

You may refer your complaint to AFCA at any time. If your complaint is not resolved to your satisfaction within 30 calendar days of the date on which you first made the complaint, AFCA may review it, subject to its Rules.

AFCA's contact details are:

### **Australian Financial Complaints Authority**

GPO Box 3  
 Melbourne VIC 3001  
 Telephone: 1800 931 678  
 Email: [info@afca.org.au](mailto: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.

## WHAT IF YOU NEED ADDITIONAL ASSISTANCE?

If you need any other assistance, please refer to our following services that can be located on our website at <https://aircrewinsurance.com.au/>.

- Translation and Teletype Services
- Family Violence and Supporting Vulnerable Customers Policy
- Financial Hardship Policy