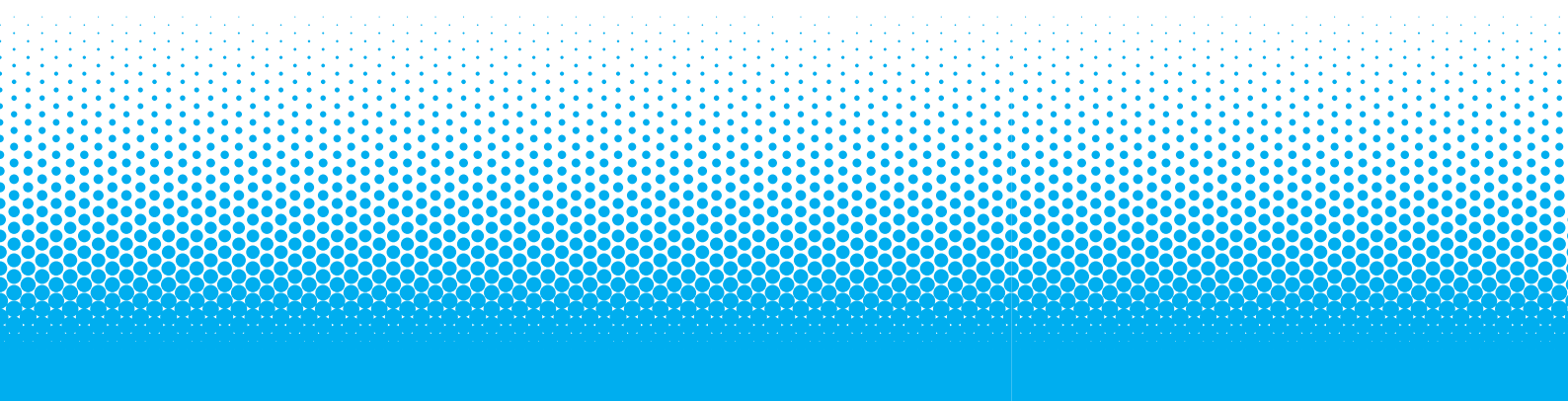




Complaints and Dispute  
Resolution Process  
2023 12



# COMPLAINTS AND DISPUTE RESOLUTION PROCESS

You may complain to us about any aspect of your relationship with us including about our products, services, staff or handling of a complaint. Our aim is to do the right thing for our customers, however sometimes differences may occur. When this happens, our aim is to resolve them as quickly and amicably as possible.

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## WHAT IS A COMPLAINT?

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- a. A complaint is an expression of dissatisfaction made to or about us, related to our products, services, staff, or the handling of a complaint, where a response or resolution is explicitly or implicitly expected, or;
- b. Legally required.

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## WHAT IS AN ELIGIBLE COMPLAINANT?

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- a. A person or small business. It includes, at a minimum “an individual consumer or guarantor” and a ‘small business’ as defined by s761G of the Corporations Act. In addition, the Australian Financial Complaints Authority (AFCA) has jurisdiction to review complaints from the following:
  - 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 not-for-profit organisation, club or incorporated association – if the club or incorporated association carries on a business, the business must be a Small Business;
- f. a body corporate of a strata title or company title building which is wholly occupied for residential or Small Business purposes; or
- g. the policy holder of a group general insurance policy, where the dispute relates to the payment of benefits under that policy
- h. In relation to:
  1. Retail General Insurance Policy (i.e. home, motor, sickness & accident, travel, personal & domestic property incl. valuables, pleasurecraft, caravans, fine art, farm etc,
  2. Residential Strata Title Insurance Product,
  3. Small Business Insurance Product (currently excluding legal liability or professional indemnity products); or
  4. Medical indemnity insurance product.
- i. Small Business means a business employing under 100 employees at the time of the act or omission by the financial firm that gave rise to the complaint

With this in mind, our Internal Dispute Resolution (IDR) is available in the event that a customer is not satisfied with our products or services or any other matter. The IDR process is free of charge and at no cost to the customer.

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## WHAT TO DO IF YOU HAVE A COMPLAINT?

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To utilise our IDR process, you may contact us by either email, telephone or mail:

Telephone: **+61 474 770 034**

E-mail: **support@halo.com.au**

Mail: Level 3, 85 William St, Darlinghurst NSW 2010

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## INFORMATION REQUIRED TO ASSIST IN HANDLING YOUR COMPLAINT

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In trying to resolve your complaint all relevant documentation and communication will need to be reviewed to assist in expediting our response. Documentation such as:

- Details (Name and address) of the insurance broker that assisted in placing the insurance policy
- Policy details including the Policy number, Insured name and contact details & policy type
- Any relevant claim details including claim number and communication with the claims handler
- An explanation of the complaint and the series of events that lead to the complaint

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## HOW WE WILL HANDLE YOUR COMPLAINT

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**Day Zero** – Complaint received.

**1 Business Day** – Complaint acknowledged, and the complainant provided the name and contact details of the person reviewing the complaint

**5 Business Days** – Lloyd's UK Complaints Team is notified of receipt using the Notification Spreadsheet, which is emailed to [complaints-notification@lloyds.com](mailto:complaints-notification@lloyds.com)

**10 Business Days** – Stage One review due and, if not completed, escalated to Lloyd's Australia, unless entity reviewing complaint requests extension from Lloyd's Australia, via

[IDRAustralia@lloyds.com](mailto:IDRAustralia@lloyds.com), and provides update to the complainant.

Lloyd's UK Complaints Team is notified of the outcome using the Notification Spreadsheet within 2 Business Days of the outcome, by email to [complaints-notifications@lloyds.com](mailto:complaints-notifications@lloyds.com)

**At Least Every 10 Business Days** – Entity reviewing complaint provides update to the complainant, unless otherwise agreed

**By 30 Calendar Days** – Final decision due and, if not complete, written update provided to the complainant, including reasons for the delay, right to refer complaint to AFCA and AFCA contact details.

### **AFCA contact details:**

Telephone: **1800 931 678**

E-mail: **info@afca.org.au**

Mail: Australian Financial Complaints Authority GPO Box 3, Melbourne VIC 3001

The complaint will be reported to the Managing Agent each 7 days

The overall responsibility for handling the Complaint is the CEO Peter Takos.

### **Contact details**

E-mail: **peter.takos@halounderwriting.com.au**

Telephone: **+61 474 770 034**

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## TRAINING AND AWARENESS FOR STAFF

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All staff members receive regular training and awareness programs to ensure that they understand the Complaints Handling Procedure and are equipped to handle complaints effectively and efficiently.

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## VULNERABILITY SUPPORT AND FINANCIAL HARDSHIP

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Financial Hardship involves an inability of the customer to pay a debt, rather than an unwillingness to do so. Financial Hardship can arise from a variety of situations and can be either of limited duration or long term.

If we are informed that you are experiencing Financial Hardship, we are required to supply you with an application form for Financial Hardship assistance and contact details for the National Financial Counselling hotline: **1800 007 007**.

We will review any applications for Vulnerability Support and/or Financial Hardship in accordance with Part 9 (Supporting customers experiencing vulnerability) and Part 10 (Financial Hardship) of the General Insurance Code of Practice and any applicable guidelines.

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## EXTERNAL DISPUTE RESOLUTION PROCESS (EDR)

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If the IDR process has not resolved your complaint within 30 days of when Halo first received your complaint, you have the right seek an external review via AFCA as per their contact details above.

**<https://www.afca.org.au/make-a-complaint>**

AFCA is an independent body that operate nationally in Australia and aims to resolve disputes. AFCA provides fair and independent financial services complaint resolution that is free to consumers. Your dispute must be referred to AFCA within 6 years of the date of our 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 Services (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.

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

Telephone: **0300 123 9 123** or **0800 023 4 567**

E-mail: **[complaint.info@financial-ombudsman.org.uk](mailto:complaint.info@financial-ombudsman.org.uk)**

Mail: Financial Ombudsman Service Exchange Tower, London E14 9SR

## **CONTACT**

Halo Underwriting

ABN 48 008 497 318, AFS Licence No: 237267

Head Office: 85 William Street, Darlinghurst, Sydney NSW 2000

Client enquiries [www.halounderwriting.com.au](http://www.halounderwriting.com.au)