



**Great Lakes Insurance SE (Australian Branch) Complaints
and Disputes Handling Policy**

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Great Lakes Insurance SE T/A Great Lakes
Australia (ARBN 127 740 532, ABN 18 964 580
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The contact details for Great Lakes Australia are:

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Great Lakes Australia Complaints and Disputes Handling Policy

Together, we engage with everything we have and are, to help humankind act braver and better.

1. Introduction

Great Lakes Insurance SE is a registered foreign company in Australia and a wholly owned subsidiary of Munich Re, trading in Australia as Great Lakes Australia (GLA). GLA is the specialty insurance solution provider for the Munich Re Group conducting agency, large single risk and group retro business in Australia. GLA is regulated by the Australian Prudential Regulatory Authority (APRA) as a general insurer and is licensed by the Australian Securities and Investment Commission (ASIC) to carry on financial services in Australia subject to the terms and conditions of its Australian Financial Services Licence (AFSL).

As a condition of its AFSL, GLA is required to have in place an internal dispute resolution (IDR) procedure for handling complaints that is compliant with ASIC regulatory requirement and is also required to be a member of an external dispute resolution (EDR) scheme.

GLA is also committed to continuous improvement and values customer feedback and complaints to improve the products and services it provides to its customers. GLA has a complaints and internal dispute resolution process to ensure that GLA handles complaints fairly, efficiently and effectively with a view to:

- respond to issues raised by people making complaints in a timely and cost-effective way
- boost public confidence in its administrative process, and
- provide information that can be used to deliver quality improvements in its products, services, staff and complaint handling.

GLA is also a subscriber to the General Insurance Code of Practice 2020 ('the Code'). Further information about the Code is available at <http://www.insurancecode.org.au>.

2. Scope

This Complaints Handling and Dispute Handling Policy applies to complaints made by retail and wholesale customers.

As a customer, you may complain about any aspect of relationship with GLA. The GLA complaints and disputes resolution process is available to you, free of charge.

3. What is a complaint

The Code defines a 'complaint' as an expression of dissatisfaction made about GLA 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. A complaint can be made in writing or orally.

An expression of dissatisfaction made on social media channels or accounts owned or controlled by GLA is also considered to a complaint, where the author is identifiable and contactable.

We will provide a response or resolution if you clearly request it. We will also respond to an expression of dissatisfaction if a reply is implicitly required and if you reasonably expect GLA to respond and/or take specific action.

A complaint does not have to contain the words 'complaint' or 'dispute'.

GLA's Complaints and Dispute Handling Procedure has three (3) stages as detailed below.

4. GLA's Complaints and Dispute Resolution Process

4.1. Stage 1 – Making a complaint

If you are dissatisfied with any aspect of their relationship or interaction with GLA (including those with its agents or distributors) and wish to make a complaint, you can make a complaint to GLA at:

Phone : (02) 9272 8000
Email : disputes@gla.com.au
Post : Level 28, 60 Martin Place, Sydney NSW 2000

We recognise that complaints can be communicated in many ways and does not to have be lodged in writing. If you require assistance to lodge a complaint, the Internal Dispute Resolution Officer of GLA will be happy to assist you in lodging a complaint. GLA will also accept a complaint lodged on your behalf by a representative that you nominate.

To assist GLA in dealing with your complaint, please provide GLA as much information as you can about the reason(s) for your complaint including your claim and/or policy number (if available). Once GLA has received your complaint, we will:

- Within one (1) business day of receipt, or as soon as practicable, acknowledge the complaint has been received. We will let you know the name and relevant contact details of the person assigned to liaise with you about your complaint.
- Within five (5) business days of receipt, we will use our best efforts to resolve your complaint to your satisfaction. In circumstances where we have given you an explanation and/or issued you an apology within five (5) days, we will not be required to respond to complaint in writing, unless you make this request, or the complaint relates to a hardship, a declined insurance claim or the value of the insurance claim.
- Investigate your complaint and keep you informed of the progress of our investigation every ten (10) business days, unless the complaint is resolved earlier, or if we have agreed with you a different timeframe to resolve your complaint.
- Only ask you for, and rely on, information that is relevant to our decision.
- Aim to respond to your complaint in writing within fifteen (15) business days, although in some cases we will make our decision and respond to you in writing within thirty (30) calendar days. In our written response, we will explain your right, if you are not satisfied with the decision, to request the complaint to be referred to Stage 2 or take the complaint to AFCA; and
- Within ten (10) business days of you making such a request, we will provide you with the information we relied upon in making our decision. The information required to be provided is set in Part 12 of the Code.

4.2. Stage 2 – IDR Team

If you advise us that you wish to take your complaint to Stage 2, your complaint will be reviewed by our IDR Team, who are independent from the staff members that were involved with the decision or conduct which is subject of the complaint, or the staff member that handled the complaint at Stage 1.

The IDR Team will aim to respond to your complaint in writing fifteen (15) business days of receipt of the original complaint. In all cases, we will make our decision and respond to you in writing within thirty (30) calendar days of receipt of the original complaint.

However, there may be some cases where we require further time and we will work with you to agree a different timeframe. In our written response, we will explain your right, if you are not satisfied with the decision, you can request the complaint be referred to AFCA.

4.3. Stage 3 – Escalation to External Dispute Resolution (EDR)

If you disagree with Our decision in Stage 2, and we are unable to resolve your complaint to your satisfaction within thirty (30) calendar days, you may refer your complaint for EDR to Australian Financial Complaints Authority (AFCA), subject to its rules and guidelines. AFCA provides a **free** dispute resolution service to you and third parties within their rules and operating guidelines.

You may contact AFCA at any time during the complaints handling process for information, including whether your complaint or dispute falls within their rules and operating guidelines, at:

Online: www.afca.org.au
Phone: 1800 931 678 (free call)
Email: info@afca.org.au
Post: GPO Box 3
Melbourne VIC 3001

If you would like to refer your dispute to AFCA, you must do so within two (2) years of the date of our final IDR response.

All determinations made by AFCA are binding upon GLA. If you remain dissatisfied with AFCA's determination, you have the right to resolve your complaint in other ways, including through legal proceedings.

5. Request for information

Part 12 of the Code provides that you may request copies of information GLA has relied upon to make its decision regarding the complaint. The documents you may access include documents and information we relied on to decline your claim, copies of your product disclosure statement and insurance, copies of any reports from service suppliers or external experts that we relied upon, including copies of transcripts relied upon. We must provide you with the information we relied upon in making a decision about your complaint within ten (10) business days of your request.

GLA may refuse to provide you access to or disclose information where the information is protected from disclosure (e.g., Privacy Act 1988 (Cth)), or where there may be unreasonable impact on the privacy of other individuals or government agencies. In these cases, we will provide you with our reasons for declining your request.

6. Your Privacy

We are committed to ensuring that your personal and/or sensitive information is protected in accordance with the *Privacy Act 1988* (Cth). We will only collect, use, store, disclose and destroy your personal information in accordance with the Australian Privacy Principles and in accordance with our Privacy Policy.