

Complaints Handling Policy



**For general insurance
business**



Swiss Re International SE Australia Branch (Swiss Re)

Swiss Re International SE, Australia Branch is a member of the Swiss Re Group. Operating under the brand of Swiss Re Corporate Solutions, the commercial insurance arm of the Swiss Re Group, Swiss Re International SE, Australia Branch (referred to in this Complaints Handling Policy as "**Swiss Re**", "**We**" or "**Us**") is licenced by the Australian Securities & Investments Commission 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, Swiss Re is required to have in place an internal dispute resolution ("**IDR**") process for handling complaints with all clients. It is also required be a member of an external dispute resolution ("**EDR**") scheme. On 1 November 2018, the Australian Financial Complaints Authority ("**AFCA**") replaced the Financial Ombudsman Service as the EDR scheme.

In addition to its obligations as an AFSL holder, Swiss Re has agreed to be bound by the General Insurance Code of Practice 2020 ("**the Code**") in respect to its conduct as a general insurer. Further information about the Code is available at <http://www.codeofpractice.com.au> and upon request.

As a customer, you may complain about any aspect of your relationship with Swiss Re.

Swiss Re has a detailed Complaints and Disputes Resolution Process in place to address customer complaints.

The Swiss Re complaints and disputes resolution service is available to you, free of charge.

We can provide you with a hard copy or other format of this Complaints Handling Policy, or a copy in another language, upon request.

Scope

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

What is a complaint?

The Code defines a complaint as an expression of dissatisfaction made to or about Swiss Re, 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.

You may complain about any aspect of your relationship with Swiss Re.

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

A response or resolution is 'explicitly expected' if you clearly request it. It is 'implicitly expected' if you raise the expression of dissatisfaction in a way that implies you reasonably expect Swiss Re to respond and/or take specific action.

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



Stage 1

If you are dissatisfied with any aspect of your relationship with Swiss Re and wish to make a complaint, please contact Us at:

Phone:	+61 2 8295 9500
Email:	complaints_ANZ@swissre.com
Post:	Level 36, Tower Two, International Towers Sydney 200 Barangaroo Avenue Sydney NSW 2000

We are flexible about how you lodge your complaint. A complaint does not need to be lodged in writing.

If you require assistance to lodge a complaint, We would be pleased to discuss the matter with you. We will also accept a complaint lodged on your behalf by a representative that you nominate.

To assist Us in dealing with your complaint, please provide Us with your claim or policy number (if applicable) and as much information as you can about the reason for your complaint. Once We receive your complaint, We will:

- within **one (1) business day** of receipt, acknowledge the complaint has been received. We will inform you of the name and relevant contact details of the person assigned to liaise with you about your complaint;
- within **five (5) business days of receipt**, if We can resolve the complaint to your satisfaction, or We have given you an explanation and/or apology when We can take no further action to reasonably address the complaint, we will not be required to respond to your complaint in writing, unless you make this request, or the complaint relates to hardship, a declined insurance claim or the value of an 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 We have agreed with you to a different timeframe;
- 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 all cases We will make Our decision and respond to you in writing within **thirty (30) calendar days**. If We require further time, 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, to request the complaint 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 out in Part 12 of the Code.



Stage 2

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 within **fifteen (15) business days** of receipt of the original complaint, not the commencement of **Stage 2**, although 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. If We require further time, 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, to request the complaint be referred to AFCA.

Stage 3

If you are dissatisfied with Our decision in **Stage 2**, or We are unable to resolve your complaint to your satisfaction within **thirty (30) calendar days**, you may refer your complaint for EDR to AFCA, subject to its Rules and Operational Guidelines. AFCA provides a free dispute resolution service to consumers and third parties who fall within their Rules and Operational Guidelines.

You may contact AFCA at any time during the complaints handling process for information, including whether or not your complaint or dispute falls within their Rules and Operational Guidelines, at:

Online:	www.afca.org.au
Phone:	1800 931 678
Email:	info@afca.org.au
Post:	Australian Financial Complaints Authority 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.

Request for Information

Part 12 of the Code provides that you may request copies of information Swiss Re has relied upon to arrive at its decision in the complaints handling process. These 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 on and copies of any recordings and/or transcripts of any interaction We had with you that We



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relied on. We must provide you with the information We relied on in making a decision about your complaint within **ten (10) business days** of your request.

Swiss Re may decline to provide access to or disclose information where the information is protected from disclosure under law (such as the *Privacy Act 1988* (Cth)), or where the claim is or has been investigated and giving access would have an unreasonable impact on the privacy of other individuals or government agencies, or where the release may be prejudicial to Us in relation to a complaint or dispute, about your insurance cover or your claim (however even in this circumstance We must provide you with access to any external experts' reports We relied on). Where We decline to provide you with information, we will provide you with reasons. You may request a review of our decision not to release the information.

Your Privacy

Swiss Re is committed to ensuring that your personal and/or sensitive information is protected in accordance with the *Privacy Act 1988* (as amended). We collect, use, store, disclose and destroy your personal information in accordance with the Australian Privacy Principles and in accordance with our [Privacy Policy](#).