



Swan Insurance & Reinsurance Brokerage Limited

Complaints Handling Policy

Version 1

Revision History

VERSION	REVISION DATE	DESCRIPTION OF REVISION
1	2022.01	Created for licencing

COMPLAINTS HANDLING POLICY AND PROCEDURES

A complaint is normally considered to be **any expression of dissatisfaction, whether oral or written, and whether justified or not, from or on behalf of an eligible complainant about the Firm's provision of, or failure to provide, a financial service.**

If the Firm considers that another Authorised Person or a Regulated Financial Institution is entirely or partly responsible for the subject matter of a complaint, it may refer the complaint, or the relevant part of it, to the other Authorised Person or Regulated Financial Institution as follows:

- inform the complainant promptly and in writing that it would like to refer the Complaint, either entirely or in part, to another Authorised Person or Regulated Financial Institution, and obtain the written consent of the complainant to do so;
- if the complainant consents to the referral of the complaint, refer the complaint to the other Authorised Person or Regulated Financial Institution promptly and in writing;
- inform the complainant promptly and in writing that the complaint has been referred and include adequate contact details of any individual at the other Authorised Person or Regulated Financial Institution responsible for handling the complaint; and
- continue to deal with any part of the complaint not referred to the other Authorised Person or Regulated Financial Institution, in accordance with the requirements set out within this section of the Manual.

Upon receipt of a complaint:

1. Any employee who receives a complaint, whether verbally or in writing, must report it to the Compliance Officer and SEO immediately upon receipt.
2. The Compliance Officer or SEO must send an acknowledgement of receipt to the complainant within 7 days of receipt of the complaint, including the following information:
 - a. the contact details of any individual responsible for handling the Complaint;
 - b. key particulars of the Firm's Complaints handling procedures; and
 - c. a statement that a copy of the procedures is available free of charge upon request.

Investigation and resolution:

- In normal circumstances, full resolution of the complaint should take place within 30 days. If further time is required to resolve the complaint, the Firm should keep the client apprised of the steps being taken to resolve the complaint.
- The Firm should ensure that the individual handling the complaint is not the subject of the complaint. The person handling the complaint must be able to do so in a fair

and impartial manner and must possess sufficient authority. This decision on who will handle the complaint will be arrived at jointly by the SEO and Compliance Officer.

- Upon conclusion of an investigation of a Complaint, the Compliance Officer or SEO must promptly:
 - advise the complainant in writing of the resolution of the Complaint;
 - provide the complainant with clear terms of redress, if applicable; and
 - comply with the terms of redress if accepted by the complainant.
- All complaints must be logged within the Firm's **Complaints Register**, along with details of the resolution. This is then used to analyse whether there are any systemic/recurring issues at the Firm. The DFSA should be notified about any complaints in which a breach of the DFSA rules has been identified or if any systemic issues have been identified.
- Records relating to all complaints must be maintained for at least 6 years from date of receipt.