
TREATING CUSTOMERS FAIRLY/ CONDUCT RISK/COMPLAINTS



Although the Financial Conduct Authority's (FCA) regulations regarding TCF are principally aimed at retail clients, ACIS Cargo's policy is to ensure that best practice is followed as a matter of course.

Treating customers fairly – towards fair outcomes for our clients. Our six consumer outcomes explain what we want TCF to achieve for our clients. These remain core to what we expect of all employees. We will continue to use them as an important factor in guiding regulatory decisions and actions.

- Clients can be confident in dealing with us since their fair treatment is central to our corporate culture.
- Products and services marketed and sold in the market are designed to meet the needs of identified client groups and are targeted accordingly.
- Clients are provided with clear information and are kept appropriately informed before, during and after the point of sale.
- We will not give advice or recommendations to clients. Queries, however, will be answered to the best of our ability with the caveat that clients should consult legal counsel for full and comprehensive advice.
- Clients are provided with products that perform as we have led them to expect, and the associated service is of an acceptable standard and as they have been led to expect.
- Clients do not face unreasonable post-sale barriers imposed by us to change product, switch provider, submit a claim or make a complaint.

This begins with the initial approach and we should aim to respond to clients/brokers promptly and should be very clear and transparent in all communications. Equally important, documentation must be issued as quickly as possible to ensure contract certainty.

When complaints are received, they should be notified to Kevin Hughes at kevin.hughes@aciscargo.com who will oversee the response to the client. All complaints must be investigated thoroughly with the aim of bringing about a satisfactory conclusion as soon as possible. Particularly in the area of claims, there will be times when a client feels that a claim should be paid which is not actually covered by the scope of the cover given. Care should be taken to ensure that correspondence and the policy document were quite clear in setting out the extent of cover along with any exclusions. This review must be impartial and objective and, in the event that there are no grounds for providing indemnity, this must be explained clearly to the client.

Complainants must also be made aware of their options in the event that we are unable to agree their complaint and this should be communicated to them in writing. Of course not all complaints will be upheld but we must be courteous, prompt, fair and consistent in dealing with clients. We are a service industry.

In the event that a complaint is upheld, then we should look to resolve the matter with the client as quickly as possible but we should also learn from the circumstances and take steps to avoid any similar instances in the future.

Complaints will be registered by Kevin Hughes in electronic form and will be reviewed by the Board on a quarterly basis. In turn, these will be reported to the FCA and ACIS Cargo's supporting underwriters. ACIS Cargo underwrites insurance policies for and on behalf of a number of insurers. For the avoidance of doubt, ACIS Cargo does not have authority to handle complaints against insurers but as part of the reporting of complaints process, will forward all details of any complaints (whether or not from eligible complainants, as defined by the FCA) and will keep them closely appraised of developments.

Where your policy is underwritten by Lloyd's underwriters, you can contact the Lloyd's Complaints Department who may be able to consider your claim. You can find out more at www.lloyds.com and www.lloyds.com/the-market/operating-at-lloyds/regulation/complaints, Their contact details are Complaints, Fidentia House, Walter Burke Way, Chatham Maritime, Kent ME4 4RN United Kingdom. You can email complaints@lloyds.com or call +44 (0) 20 7327 5693

If you remain dissatisfied and are seeking resolution as a private individual or as a small business, charity or trust with an annual turnover of less than GBP 1 million, you may refer the matter to the Financial Ombudsman Service at South Quay Plaza, 183 Marsh Wall, London E14 9SR, call them on +44 (0) 845 080 1800 or email enquiries@financial-ombudsman.org.uk For further information regarding FOS please visit their website www.financial-ombudsman.org.uk

We are covered by the FSCS. You may be entitled to compensation from the scheme if we cannot meet our obligations. This depends upon on the type of business and the circumstances of the claim. Insurance advising and arranging is covered for 100% of the first GBP 2,000 and 90% of the remainder of the claim, without any upper limit. Further information about compensation scheme arrangements is available from the FSCS 7th Floor, Lloyd's Chambers, 1 Portsoken Street, London E1 8BN or by visiting their website www.fscs.org.uk.