

COMPLAINTS HANDLING PROCEDURE



At Miller, we are committed to providing a quality and professional service, and to act with honesty, integrity and transparency. However we understand that there may be times when you may feel we do not meet your expectations, and we want to know about these immediately, so any issues can be resolved quickly.

The way in which we handle and resolve complaints is consistent with the high levels of service we aim to give all our clients. It is our policy to ensure that all valid complaints are settled fairly, consistently and promptly. Our complaints procedure is also designed to be consistent with regulatory requirements regarding dispute resolution, and additional rights will be available to 'eligible complainants'.

An 'eligible complainant' is defined by the FCA as:

- » a private individual;
- » a guarantor;
- » a charity with an income of less than GBP6.5m;
- » a trustee with a net asset value of less than GBP5m;
- » a micro-enterprise with fewer than 10 employees and a turnover or balance sheet total of less than EUR2m at the time of the complaint; or
- » a small business with an annual turnover of less than GBP6.5m and (a) fewer than 50 employees or (b) annual balance sheet total of less than GBP5m at the time of the complaint.

Responsibility

Overall responsibility for this policy is assigned to Scott Charnock, Miller's Head of Risk & Compliance. He will be made aware of all complaints received by Miller and will ensure that the correct procedures are enforced.

Introduction

For the purposes of this procedure we use the following definition of a complaint, which is "any expression of dissatisfaction, whether oral or written, and whether justified or not, from or on behalf of a complainant about the firm's provision of, or failure to provide, a financial service."

How to make a complaint

In the event that you wish to make a complaint, you may lodge it in any format (face to face, telephone, letter, fax or e-mail).

However, we would ask that, in the first instance, you address your complaint to your Account Handler, Claims Handler, or the Head of Risk & Compliance at:

Miller Insurance Services LLP

70 Mark Lane
London EC3R 7NQ
Tel: +44 2074882345

If you wish to lodge a complaint via email, our addresses are in the following format:

firstname.surname@miller-insurance.com

We also operate a central email address for complaints:

complaints@miller-insurance.com

What happens when Miller receives a complaint?

1. Initially your complaint will be assessed to determine if it can be resolved to your satisfaction within three business days of us receiving it. If you are an eligible complainant and we have resolved your complaint within three business days, we will confirm this by issuing to you a Summary Resolution Communication Letter. This letter will provide you with details of how to refer your complaint to the Financial Ombudsman Service (FOS), should you subsequently decide you are unhappy with the resolution of the complaint.
2. If the complaint cannot be resolved within three business days, the Head of Risk & Compliance will be informed.

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3. The complaint will then be assessed to determine its nature and an appropriate independent Complaint Handler will be assigned to manage your complaint until it is resolved. The Complaint Handler will be a suitably skilled and experienced individual, who will not have been directly involved in the issue or event that caused the complaint. The Complaint Handler's handling of the complaint will be supervised by the Head of Operations of the relevant business unit and the Head of Risk & Compliance.
 4. The Complaint Handler will respond to you in writing, no later than five working days after receipt of the complaint. The Complaint Handler will introduce themselves to you, acknowledge receipt of the complaint and will remind you of our Complaints Procedure so you understand the process. The letter will give you an indication of when you can expect a final response. We aim to resolve all complaints at the earliest possible opportunity.
 5. If your complaint does not relate to a service that Miller provides, we will inform you in writing as soon as possible, but no later than five working days of receipt of the complaint. We will also assist you to identify the correct person or entity to whom your complaint should be addressed.
 6. In order to fully understand the nature of the complaint and how it occurred, we will review all relevant documentation and materials, and speak to the Miller personnel involved in the issue and you, if appropriate. You will be informed of delays that may affect our ability to resolve the complaint in a timely fashion or to your satisfaction.
 7. We will aim to provide you with a final response by the date indicated in the acknowledgement letter. If at any time we consider that this will not be possible, we will send to you a holding response, which will explain to you the reason for the delay and indicate when you can expect a final response. If you are an eligible complainant and we are unable to provide you with a final response within eight weeks of receiving your complaint, we will write to you explaining the reasons for any delays and FOS referral rights.
 8. The final response will address the subject matter of each point raised in your complaint and, if the complaint is upheld, propose the appropriate course of action.
 9. We will close a complaint when we have sent a final response, if you have indicated in writing acceptance of Miller's earlier response, or if you have not responded to Miller within eight weeks of our final response.
 10. Once the complaint has been closed, we will retain the relevant documentation for a minimum of three years.
- ### Eligible complainants' referral rights
11. If you are an 'eligible complainant' and in the unlikely event that we are unable to resolve your complaint to your satisfaction, you may be entitled to refer your complaint to the FOS and must do so within six months of receiving our final response.
 12. Further details on the FOS can be found on its website at www.financial-ombudsman.org.uk. Alternatively it can be contacted at:

The Financial Ombudsman Service
Exchange Tower
London E14 9SR
0800 023 4 567
 13. If in placing your policy, Miller has acted as a coverholder of Lloyd's, you may also be entitled to refer your complaint to Lloyd's. Details of Lloyd's complaints procedures are available at www.lloyds.com/complaints and its Complaints team can be contacted at:

Lloyd's
Fidentia House
Walter Burke Way
Chatham Maritime
Chatham
Kent ME4 4RN
0207 327 5693
complaints@lloyds.com