

Code of Practice

Introduction

Suncorp Group ('Suncorp') has adopted the General Insurance Code of Practice as the benchmark for service and claims when delivering services to our customers.

Code of Practice

The <u>General Insurance Code of Practice</u> ('Code') came into effect on 1 July 2014 and sets out the standards that general insurers must meet when providing services to their customers in an open, fair and honest way. Its standards apply to many aspects of a customers relationship with their insurer, from buying insurance to making a claim (including timeframes for making claim decisions), to providing options to those experiencing financial hardship, and processes for making complaints.

The Code applies to customers, third parties (in certain scenarios) and third-party beneficiaries (collectively referred to as 'Customer') and applies to all Property Insurance claims, including catastrophe or event claims.

Late 2019, the Insurance Council of Australia (ICA) approved a new Code after one of the most extensive reviews in the Code's 25-year history.

It has been comprehensively updated and rewritten to further enhance the rights and expectations insurance customers can expect in their relationship with their insurer.

The new Code formally came into effect on 1 January 2020 and Suncorp are working to ensure everyone has the right tools, training and systems to be able to respond to these commitments.



Code of Practice

Code Requirements

At all times when carrying out work for Suncorp:

- Conduct the work on our behalf in an honest, timely (SLAs require customer contact within 24 hours), fair, and transparent manner.
- During initial customer contact, explain you have been engaged by the 'respective Brand' and what services have been authorised. Upon completion explain the next steps for progressing their claim.
- Only ask for and rely on information that is relevant to the claim and to assist Suncorp make a decision about the claim;
- Where you provide assessing work for Catastrophe/Event claims, ensure that you and your personnel respond (and assist Suncorp to respond) in an efficient, professional, and practical way, and in a compassionate manner in your dealings with customers (building specific).
- Produce reports that:
 - Are factually accurate and provided to Suncorp promptly (seven calendar day SLA)
 - · Base advice and recommendations on all relevant facts, the terms of the policy, and all relevant information
 - Include full reasons for recommendations

Do not:

- Under no circumstances will you have any authority to accept or reject a customer's claim or carry out any work outside
 the scope of instructions provided, unless stipulated in the agreement i.e. under \$10,000 Do & Charge ('D&C') provided
 the criteria is followed as authorised by Suncorp.
- Allow the assessing work to be sub-contracted to anybody else without approval, unless stipulated in the agreement.



Examples of complaints

A complaint is an expression of dissatisfaction made to an organisation related to its products or services, or the complaints handling process itself, where a response or resolution is expected.

Examples of valid complaints would be (but not limited to):

- Customer is unhappy with the overall process, claim and/or repair process
- The customer does not want to pay the claim excess
- No contact has been made to the customer and they've had to initiate all contact
- Appointments cancelled, rescheduled and/or missed causing inconvenience
- Attendance to customer's property to fulfil requested services is unannounced causing inconvenience
- Inappropriate comments or behaviours shown towards the customer
- Customer's personal details are released or provided to unauthorised personnel
- Additional damage occurs to the property, an item within the property, or personal belongings, during the assessment or repair/replacement process
- Customer is unhappy on the amount settled, scope of works agreed and/or repairs or replacement



Handling complaints

When handling complaints:

- The customer should not be discouraged from raising any concerns or making a formal complaint
- The complaint is to be handled in a fair, transparent or timely manner, only asking for and relying on information relevant to the decision in dealing with the complaint
- Take immediate action to correct an error or mistake that is found
- Where customers raise concerns with the scope or quality of repair or replacement, the customer must be contacted within 24hours and attempts made to reach agreement on the best way to address the concerns
- Where you are unable to satisfy all of the customer's concerns, this
 then becomes a complaint and should be notified to Suncorp Group
 immediately, and advise the customer you are doing so
- Notify Suncorp Group of the complaint within 24hours; urgent complaints are to be called through to the Client Manager
- Details about rectification issues and complaints must be accurately and comprehensively recorded and reported





Complaints Process

Day 1 (Vendor)	Day 5 (Suncorp)	Day 10 (Suncorp)	Day 15 (Suncorp)	Day 45 (Suncorp)
Acknowledge complain		int should be d by close of	Provide progress update (and every 10 business	Complaint must be resolved by close of business	Complaint must be resolved
Attempt to resolve complaint Call through to Sunco for urgent complaints complete the complaint form within Claims Hu	busines If not re custome escalate Level 2 Can be	s. solved, advise er of right to et to CR IDR for	days from last date of contact)	If not resolved, must escalate to CR IDR as Level 2 complaint	If not resolved, advise reason for delay and right to go to AFCA and provide AFCA contact details
CEO Complaints (Suncorp)	Immediately in Executive Ma	Written acknowledgement provided to customer referring complaint to Claims Management/Distribution Management Immediately referred to IDR for review and referral to appropriate Executive Manager Executive Manager acknowledges within 24hours (phone/letter) and provides decision within 5 Business Days Resolved: Executive Manager to provide written response of decision Unresolved: Executive Manager to provide written response of decision and refer complaint to AFCA			

^{*} CR IDR – Customer Relations Internal Dispute Resolution

^{*} AFCA – Australian Financial Complaints Authority



Customers Experiencing Vulnerability

Vulnerable Customers

Code requirements



SUPPORTING CUSTOMERS EXPERIENCING VULNERABILITY

A new obligation (previously not featured in the Code) has been introduced, which focuses on supporting customers experiencing vulnerability and protecting customers who are experiencing family violence.

We have committed to publishing a policy that clearly explains how we will support customers affected by family violence and deliver process and system enhancements (supported by training) in order to meet the new vulnerability obligations.

The new policy will be published on 24 June 2020.

Vulnerable Customers

Code requirements

The new Code:

- Outlines different types of vulnerabilities
- Encourages customers to let us know if and when they are facing vulnerability
- Outlines that we will work with customers to find a suitable, sensitive and compassionate way to proceed, as early as practicable
- Outlines requirements to train our people to identify vulnerability, identify support required and take into consideration a customer's individual needs
- Outlines the involvement of nominated representatives and their role in providing support, and our responsibility to work with nominated representatives
- Provides obligations about the use of interpreter service
- Protects the information of our customers when they are experiencing family violence



Suncorp is committed to being there in those moments and working with our customers to ensure they are supported to make informed decisions that are in their best interests.

We want to be able to work with all our customers, third parties and beneficiaries to ensure that if a person is experiencing vulnerability, we have the necessary skills and tools to recognise this and respectfully address it with appropriate options, solutions and referrals.



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Vulnerable Customers

Types of Vulnerability

Some of our customers may experience vulnerability due to:

- Age
- Disability
- Mental health conditions
- Family violence
- Language and literacy barriers
- Cultural backgrounds
- Financial or social distress

Customer vulnerability could be the result of an external, sensitive situation, either directly or indirectly related to a claim. It's important to remember that everyone's situation is different.

A customer who doesn't have the capability or necessary support around them to cope, understand our processes, and actively progress and co-manage their claim, may be vulnerable and require additional tailored support through the claims process.

If you identify a customer experiencing vulnerability, please call the Client Manager and advise accordingly.



Thank you



