



DUPI GROUP

COMPLAINTS HANDLING POLICY



COLOPHON

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Version	Date	Status	Description	Author
0.1	Nov 2016	Draft	Dutch version	CvA
1.0	Nov 2017	Final	English version	lvdL
2.0	March 2018	Final	Amendments	lvdL
3.0	June 2018	Final	Amendments Lloyds International Complaints	lvdL
4.0	June 2018	Final	Amendments GDPR	lvdL
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8.0	25-05-2023	Final	Review including (international) offices	lvdL, PP, RA

1. Complaints Handling Policy DUPI Group

DUPI Group B.V. and its subsidiaries (hereinafter: "DUPI") is committed to providing a professional service of high quality, and to act with honesty, integrity and transparency.

We understand, however, that there may be times when you may feel we have not met your expectations. We kindly ask you to inform us immediately if this is the case, so we can solve any issues quickly.

The way we handle and resolve complaints is in line 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.

This Complaints Handling Policy DUPI Group [hereinafter: "Policy"] is also designed to be consistent with regulatory requirements regarding dispute resolution.

2. Responsibility, awareness and training

Overall responsibility for this Policy is assigned to the DUPI Group Executive Committee (hereinafter: "EXCO"). The supervision and registration of the handling of complaints is mandated to the DUPI Group Compliance Officer (hereinafter: "CO").

The CO will be informed immediately of all complaints received by DUPI and will ensure that the correct procedures are enforced. All staff is instructed to immediately report any complaint received to the CO.

In line with the requirements of art. 10 of the Directive (EU) 2016/97 [Insurance Distribution Directive], DUPI provides its staff with a continuous Permanent Education and Permanent Awareness education program, which includes instruction on complaint handling.

3. Definition

For the purpose of this Policy we use the following definition of a complaint:

"A complaint is any oral or written expression of dissatisfaction, whether justified or not, from or on behalf of a person about the provision of, or failure to provide, a financial service, which alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience."

4. How to make a complaint

In the event that you want to make a complaint, you may lodge it in the below formats: face to face, telephone, letter or e-mail.

We suggest that, in the first instance, you address your complaint to your contact person within DUPI or the CO.

DUPI Group B.V.
Blaak 16
3011 TA Rotterdam
The Netherlands
Tel: +31 10 7901555
compliance@dupi.com

The Policy is published on the DUPI website for the convenience of DUPI's relations:
<https://dupi.com/complaints-handling/>¹

5. Handling your complaint

1. DUPI will confirm receipt of your complaint within 2 working days.
2. Initially your complaint will be assessed to determine if it can be resolved to your satisfaction within three business days upon receipt.
3. If the complaint cannot be resolved within three business days the EXCO will be informed.
4. The complaint will then be assessed to determine its nature and an appropriate independent complaint handler [hereinafter: "Complaint Handler"] will be assigned to manage your complaint until it is resolved. The Complaint Handler will be suitably skilled and experienced, he/she 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 manager of the relevant business unit and the CO.
5. The Complaint Handler will respond to you in writing, no later than five working days after receipt of the complaint. In his/her letter or e-mail, the Complaint Handler will introduce him/herself to you, acknowledge receipt of your complaint and will remind you of our Policy so you understand the process. The letter or e-mail will also give you an indication of when you can expect a final response. We aim to resolve all complaints at the earliest possible opportunity.
6. If your complaint does not relate to a service that DUPI 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 to whom your complaint should be addressed.

¹ Website version attached to the Policy as Annex I.

7. In order to fully understand the nature of the complaint and how it occurred, we will require you to provide us with all relevant information, documentation, materials and your (written) statements for us to review and analyze. If appropriate we shall also speak to the DUPI colleague(s) involved in the matter concerning your complaint. You will be informed about any delays in the process and/or about any circumstance that may affect the ability to resolve the complaint in a timely fashion or to your satisfaction.
8. The objective is to provide you with a final response by the date indicated in the acknowledgement letter or e-mail. If at any time we anticipate that this will not be possible, we will send you a written confirmation, which will explain to you the reason for the delay and indicate when you can expect a final response.
9. Our 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.
10. We will close a complaint:
 - when we have sent a final response;
 - if you have indicated in writing acceptance of our formal response to your complaint;
 - or if you have not responded to us within six weeks of our final response.
11. With reference to article 8, once the complaint has been closed, we will retain the relevant documentation for a minimum of three years.
12. Complaints will be filed by the CO in DUPI's Complaint Log [DIG Navigator file 2017.0064]².

6. International Complaints Handling at Lloyd's

DUPI will comply with the local rules and regulations as well as Lloyd's requirements for handling complaints. DUPI will handle any international complaint from Lloyd's policyholders in agreement with the Lloyd's Y5340 Code for Complaints Handling (16 June 2021).

In accordance with the Lloyd's Code Y53340, DUPI will refer immediately to its London Managing Agents(s) as well as Lloyd's for instructions on any inquiry, complaint or request received from any Policyholder or Regulatory Agency.

DUPI will report any international complaint to Lloyd's using the standard Lloyd's forms, made available on www.loyds.com/complaintshandling and <https://lloydseurope.com/complaintshandling/>

² Attached to this Policy as Annex II.

A copy of the response together with a copy of the original complaint will be emailed to complaintsnotification@loyds.com or lloydsbrussels.complaints@loyds.com and DUPI's Managing Agent(s) within two business days after the response is sent to the complainant.

Every two weeks (or with the frequency needed to comply with the 14 day notification requirement) DUPI will complete the *Lloyd's International Complaint Notification template*, providing details of all new complaints received where the complainant is eligible to have their complaint considered by the local External Dispute Resolution (EDR) scheme.

DUPI will keep record of each complaint received in DIG Navigator file 2017.0064 ("Complaints Log") as per 5.12.

7. Referral Rights

We would like to point out that, in the unlikely event the complaint is not resolved according to your expectations, you are entitled to refer your complaint to the KiFiD or the FOS³.

You must do so within resp. 3 and 6 months of receiving our final response.

- KiFiD (Klachteninstituut Financiële Dienstverlening) at www.kifid.nl
Koningin Julianaplein 10
2595 AA Den Haag, The Netherlands
+31 70 333 8999
- FOS (Financial Ombudsman Service) at www.financial-ombudsman.org.uk
Exchange Tower
London E14 9SR, U.K.
+44 800 023 4567

8. Protection of personal information

In handling your complaint DUPI shall process any personal information in accordance with any obligations imposed upon us by applicable laws and legislation, including, but not limited to, the General Data Protection Regulation ("GDPR").

9. Evaluation

By, or on instruction of the EXCO, the Policy will be assessed each year by the CO.

This Complaints Handling Policy was approved by the Executive Committee of DUPI on 22 August 2023.

³ For a full list of EU National Competent Authorities for consumer protection please consult <https://www.eba.europa.eu/consumer-corner/national-competent-authorities-for-consumer-protection>

A N N E X I

Complaints Handling Policy DUPI website

The DUPI Group is committed to providing quality and professional service.

If, however, you feel we have not met your expectations, we intend to handle and resolve your complaint in line with the high levels of service we aim to give all of our clients and with regulatory requirements regarding dispute resolution.

It is our policy to ensure that all valid complaints are settled fairly and promptly.

In the event that you want to make a complaint, you may lodge it face to face, by telephone, by letter or e-mail.

However, we would ask that, in the first instance, you address your complaint to your contact person within DUPI or the DUPI Group Compliance Officer at:

DUPI Group B.V.
Blaak 16
3011 TA Rotterdam
The Netherlands
Tel: +31 10 4405550
compliance@dupi.com

DUPI will comply with the local rules and regulations as well as Lloyd's requirements for handling complaints. DUPI will handle any international complaint from Lloyd's policyholders in agreement with the Lloyd's Y5340 Code for Complaints Handling (16 June 2021).

A copy of DUPI's complaints handling protocol will be sent upon first request, free of charge. In the unlikely event your complaint is not handled by DUPI GROUP to your satisfaction, you are entitled to refer your complaint to the KiFiD or the FOS. You must do so within resp. 3 and 6 months of receiving our final response.

- KiFiD (Klachteninstituut Financiële Dienstverlening) at www.kifid.nl
Koningin Julianaplein 10
2595 AA 's-Gravenhage, The Netherlands
+31 70 333 8999
- FOS (Financial Ombudsman Service) at www.financial-ombudsman.org.uk
Exchange Tower
London E14 9SR, U.K.
+44 800 023 4567

In handling your complaint DUPI processes any personal information submitted in accordance with any obligations issuing from applicable laws and legislation, including, but not limited to, the General Data Protection Regulation ("GDPR").

ANNEX II

DUPI Group Complaints Log

The screenshot shows a web application interface with a top navigation bar containing 'igati...', 'Data', 'Find', and 'Administr...'. Below the navigation bar is a sidebar with a 'Files' section. The main content area features a search bar with 'Status' and 'User' dropdowns, a search icon, and a table. The table has the following columns: Project typ, Description, User, Number, Status, Deadline, and Agenda. The first row of the table contains the following data: COMPLIA..., DUPI GROUP Complaints Log, ldske van der Linden, 2017.0064, Open, and empty cells for Deadline and Agenda.

Project typ	Description	User	Number	Status	Deadline	Agenda
COMPLIA...	DUPI GROUP Complaints Log	ldske van der Linden	2017.0064	Open		