



Seib Complaints Handling Policy

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Purpose:

Seib considers customer satisfaction a major part of its mission. In order for us to achieve the desired objective of customer satisfaction, should you, as one of our esteemed customer, have any concerns or issues with any of our departments or in relations to any of the services rendered, our customer service team shall be at your disposal to assist you and to ensure a complete and expeditious satisfaction.

This policy defines the work steps to ensure that Seib manages complaints, whether oral or written, made by customers in relation to its conduct of regulated activities, are dealt fairly, efficiently, independently and with due diligence and consideration.

Scope:

The scope of implementing this policy is within the jurisdiction of the Complaints Officer under the direct supervision of the CEO. This policy should be performed taking into consideration the delegation of authority structure within Seib.

Contents:

1. General Policy Statement

The following statements represent the guiding policy, as set by the Governing Body, in implementing the Insurance Complaints Handling policy:

- 1.1 Complaints include, but are not confined to the followings:
 - 1.1.1 Any expression of grievance or dissatisfaction either orally or in a durable medium, in connection with the company's provision (or offer of the provision) of a product or service, if the provision of the product or service was or would be a regulated activity; or
 - 1.1.2 Any allegation that Seib acted outside the terms of a relevant client/ customer agreement (if any); or
 - 1.1.3 Any matter which involves, or is alleged by the complainant to involve, a breach of any statutory or regulatory requirements; or
 - 1.1.4 Any allegation concerning, malpractice, impropriety, or matter which could result in the client suffering a financial loss.
- 1.2 The internal complaint-handling procedures provide for the following:
 - 1.2.1 Receiving complaints;
 - 1.2.2 Responding to complaints;
 - 1.2.3 Meeting any service standards in relation to complaints received in accordance with this part;
 - 1.2.4 Referring complaints to other authorized firms;
 - 1.2.5 The appropriate investigation of each complaint by a person of sufficient competence who was not directly involved in the act or omission the subject of the complaint;

- 1.2.6 The person responsible for responding to a complaint having authority to settle the complaint (including offering redress if appropriate) or having ready access to someone who has the necessary authority;
 - 1.2.7 Responses to a complaint adequately addressing the subject matter of the complaint and, if the complaint is upheld, offering appropriate redress;
 - 1.2.8 Telling complainants in writing about their right to go to the customer dispute resolution scheme if relevant.
- 1.3 Additionally as per QFC legislation:
- 1.3.1 All internal complaint-handling procedures will be published to staff and a copy of the published details given to a customer, on request;
 - 1.3.2 Staff who receives a complaint from the customer (unless the complaint is resolved by close of business on the next business day) will provide the customer automatically with a copy of the complaint handling procedures; and
 - 1.3.3 Seib will clearly display in its Doha Office a notice indicating that it is covered by the customer dispute resolution scheme.
- 1.4 Seib will ensure that it handles all customer complaints timely and provide the customer with fair compensation, financial or otherwise, for any acts or omissions for which it was responsible in a timely manner.
- 1.5 All staff will coordinate with the dispute resolution scheme to resolve any customer complaints on a timely basis.

2. Receipt of Complaint

- 2.1 When any staff receives a complaint in person or by telephone, staff should respond in the following manner:
- 2.1.1 Be polite and patient;
 - 2.1.2 Do not admit liability;
 - 2.1.3 Make certain that the nature of the complaint is understood and whether the client is alleging that the client has suffered financial loss;
 - 2.1.4 If the client is merely irritated and does not have a serious complaint, inform the client that the company will try to ensure the situation which has annoyed him will not recur. If the client has a serious complaint, say the Company will investigate it and provide the client with results of the investigations in due course; and
 - 2.1.5 Provide the client with a copy of Seib's complaint handling procedures if the problem cannot be immediately resolved.

3. Recording and Reporting of Complaints

- 3.1 Seib will try to ensure that:

- 3.1.1 Complaints from clients are handled in a timely and appropriate manner;
- 3.1.2 Steps are taken to investigate and respond to complaints promptly; and
- 3.1.3 If a complaint is not remedied promptly, the client is advised of any further steps which may be available under the dispute resolution scheme.
- 3.2 The staff who received client complaint, whether made orally or in writing, must log the complaint immediately in the Complaint Log sheet and forward it to Compliance Department after differentiating between Complaint and Enquiry and assessing the importance of the complaint.
- 3.3 Complaints will be handled by the Compliance Officer who is a member of the management or a person who is more senior to the member of staff / management who is being complained, and has relevant experience, competence and seniority.
- 3.4 If a complaint is made against the most senior member of management within the Company, or if the Company is unable to resolve the problem, reference should be made to the CEO who will, in turn, if necessary, refer to the GB.
- 3.5 The complaint register should include all of the following information:
 - 3.5.1 The Date of receipt of the complaint;
 - 3.5.2 The name of the complainant;
 - 3.5.3 The name of the recipient;
 - 3.5.4 The respective department of the recipient;
 - 3.5.5 The Mode of receipt of complaint (Phone, Email, Fax, Face-to-Face)
 - 3.5.6 The name of the individual who investigated the complaint;
 - 3.5.7 A brief description of the complaint including any correspondence between the firm and the complainant;
 - 3.5.8 The Type of the complaint in order to differentiate between a Complaint or an Enquiry;
 - 3.5.9 The Category of the complaint;
 - 3.5.10 The level of Importance (High, Risk, Low);
 - 3.5.11 The summary of the investigation independently handled by the Compliance Officer;
 - 3.5.12 The actions taken to resolve the complaint or offer redress;
 - 3.5.13 The status of the complaint whether Closed, Pending or Under Investigation;
 - 3.5.14 If applicable, the steps the firm has taken to remedy a recurring or systemic problem revealed by the complaint.
- 3.6 All records must be kept for at least 6 years after the day the complaint is received.
- 3.7 Unless at the time of acknowledgment, the matter has been resolved, a reply letter will be followed which should detail all steps required and notifies the customer of his/ her right to refer the matter to the dispute resolution scheme. All written reply to the complainant should be signed by the Compliance Officer.

- 3.8 Copies of all correspondence relating to new complaints and developments in respect of existing complaints must be forwarded immediately to the Compliance Department.
- 3.9 In conducting the investigation, full cooperation from any employees and the production of any relevant documents will be required.
- 3.10 After investigation, the Compliance Officer responsible for investigation should complete the Register and deliver the Register to the relevant department for settlement with clients.

4. Settlement of Complaints

- 4.1 The complaint is to be investigated and the client advised of the outcome as soon as possible. If Seib is at fault, an apology is to be made, the position must be corrected and where appropriate, reimbursement made.
- 4.2 If a substantive response has been given to the client in relation to a complaint, it is entitled to treat the complaint as settled and resolved after the expiry of seven days from the date of the response, in the absence of an indication from the client that he / she is not satisfied with that response. However, the complainant must have been advised of his response deadline in writing. Accordingly, the following paragraph should be incorporated in the response when appropriate:
 - 4.2.1 “Finally, please be advised that in the absence of a reply from you by DDMMYYYY, being within seven days from the date of this letter, we consider the matter settled and the complaint resolved.”
- 4.3 After a complaint has been settled, the Register should be completed by the Compliance Officer. Copies of any supporting documents should be sent to the Compliance Department for records.

5. Customer Complaints Guidelines

This rule applies if a complaint has not been resolved by close of business on the next business day after the day on which it is received.

The following steps for handling customer complaints have been developed in accordance with QFC Regulations.

- 5.1 Within 5 business days after the day the complaint is received, Seib will give the complainant a written acknowledgement. The acknowledgement should:
 - 5.1.1 Give the name or job title of the individual handling the complaint;
 - 5.1.2 Give details of the Seib’s internal complaint-handling procedures if requested by the customer; and
 - 5.1.3 Can be combined with a final response if the firm can provide the response within 5 business days after the day the complaint is received.
- 5.2 Within 4 weeks after the day the complaint is received, Seib must give the complainant either:
 - 5.2.1 A final response; or

- 5.2.2 A written response explaining why it has not been able to resolve the complaint and indicating when it will contact the complainant again about the complaint.
- 5.3 Within 8 weeks after the day the complaint is received, Seib must give the complainant either:
 - 5.3.1 A final response:
 - 5.3.2 A written response that:
 - 5.3.2.1 Explains that Seib has not been able to make a final response, gives reasons for the further delay and indicates when it expects to provide a final response; and
 - 5.3.2.2 Tells the complainant that the complainant may refer the complaint to the customer dispute resolution scheme if the complainant is dissatisfied with the delay.
- 5.4 The final response mentioned will:
 - 5.4.1 Accept the complaint and, if appropriate, offer redress; or
 - 5.4.2 Offer redress without accepting the complaint; or
 - 5.4.3 Reject the complaint and give reasons for rejecting it and informing the complainant that the complainant may refer the complaint to the customer dispute resolution scheme within 4 months and the contact details for the scheme, if the complainant is dissatisfied with the final response. The email ID of CDRS is complaints@cdrs.org.qa.

6. Referring Complaints to Other Firms

- 6.1 If Seib is satisfied on reasonable grounds that another authorized firm within QFC may be solely, jointly or partly responsible for the act or omission alleged in a complaint made by a customer, it may refer all or part of the complaint to the other firm. Senior Management should decide whether or not such complaints should be referred to another firm.
- 6.2 When referring complaints the following guidelines should be followed:
 - 6.2.1 Make any referral to the other authorized firm promptly, but no later than 5 business days after the day it became satisfied that the other authorized firm may be solely, jointly or partly responsible for the act or omission the subject of the complaint;
 - 6.2.2 make a referral using a durable medium;
 - 6.2.3 tell the complainant in writing, in the final response or otherwise, about the referral and the other firm's contact details; and
 - 6.2.4 Unless it is satisfied that the other firm may be solely responsible for the act or omission the subject of the complaint, continue to comply with the requirements of COND in relation to the complaint.
- 6.3 If Seib receives a complaint referred to by another authorized firm the complaint is regarded to have been made directly to Seib by the customer; and to have been received by it when the referral was received.

Guidance Related to applying to Independent Adjudicator

1) Who can apply to Independent Adjudicator:

- (i) An individual retail customer;
- (ii) A business customer (but only if the applicant's business has no more than 20 employees);
- (iii) an individual who is or was a beneficiary under a group policy;
- (iv) an individual who is a surviving dependent of a deceased retail customer;
- (v) a legal personal representative of a deceased retail customer;
- (vi) a widow or widower of a deceased retail customer;
- (vii) an individual who is entitled to benefit from an insurance contract issued to a retail customer;

2) When to apply:

- a) An application may be made to the Independent Adjudicator within 4 calendar months after:
 - i) a final response is received (even if it was given after the end of the response period); or
 - ii) the response period has ended without the firm having given any response.
- b) The Adjudicator may accept, consider and decide an application made after the end of the period allowed by subrule (1) if the Adjudicator is satisfied that there is sufficient reason for the delay in applying.

3) How to apply:

An application to the Independent Adjudicator must be made to the Regulatory Authority at its address for the purpose notified on an approved website, or in any other way that the authority allows.

4) Effects of Independent Adjudicator's decision:

- i) After the Independent Adjudicator has given a decision, the applicant may accept the decision or refuse to accept it, but must do either within 21 days after being notified of it. The Adjudicator may extend the period for acceptance (either before or after the period has ended) if the Adjudicator is satisfied that there is sufficient reason to do so.
- ii) If the applicant does not accept the decision within the 21-day period (or any extension of it), the applicant is taken to have refused to accept the decision.
- iii) If the applicant refuses (or is taken to have refused) to accept the decision, the decision is of no effect.
- iv) If the applicant accepts the decision, the decision is binding on both the applicant and the authorised firm concerned.
- v) The firm must comply with the decision (and in particular must pay the applicant any compensation awarded) as soon as reasonably practicable.
- vi) A decision is final and is not subject to appeal.