

NobleOak Public Complaints Handling Policy

This policy applies to NobleOak Life Limited and all of its subsidiary companies.

1. Purpose

NobleOak Life Limited ("NobleOak") is committed to transparent and orderly complaints handling processes, ensuring clients are informed of and given access to NobleOak's complaint or dispute resolution procedures and that complaints are dealt with fairly, professionally, consistently, and promptly.

ASIC requires that Australian Financial Services Licence (AFSL) holders must have a dispute resolution system that consists of:

- An internal dispute resolution (IDR) procedure that meets the standards or requirement made by ASIC; and
- Membership of an external dispute resolution scheme (EDRS) such as the Australian Financial Complaints Authority (AFCA).

NobleOak is bound by The Life Insurance Code of Practice (the Code).

Chapter 7 of the Code provides guidance to clients on what they can expect from a Code subscriber in relation to:

- making a complaint;
- complaints about declined or closed claims; and
- how insurers will respond to complaints.

NobleOak seeks to cultivate an organisational culture that welcomes feedback including any concerns or complaints about our products, services, and operations. NobleOak supports the view that a positive complaint management culture can produce beneficial outcomes for both clients and NobleOak, including:

- the opportunity to resolve complaints quickly and directly;
- the promotion of trusted relationships between the parties;
- improved levels of client confidence and satisfaction;
- greater understanding of the key drivers of complaints; and
- the ability to identify emerging issues and inform product and service delivery improvements.

2. NobleOak's Publicly available Complaints Handling Policy

NobleOak's publicly available Complaints Handling Policy explains:

1. How you may lodge a complaint with NobleOak (e.g. online, by email, by phone and in person).

2. The options available to assist you if you need additional assistance to lodge a complaint.
3. NobleOak's key steps for dealing with complaints, including acknowledgement, assessment and investigation, and provision of an IDR response.
4. Response timeframes.
5. Details about accessing EDRS where a complaint is not resolved.

3. Lodging a Complaint

If you have a concern about your insurance cover or about any aspect of our service or our operations, please tell us about it so we can address your dissatisfaction.

In the first instance, it's best to talk with the person you have been dealing with at NobleOak to resolve your concern.

You can contact the Client Services Team on **1300 551 044** or email enquiry@nobleoak.com.au. We will get back to you within **1 business day**.

If your concern is resolved to your satisfaction during this interaction with the NobleOak employee your expression of dis-satisfaction will still be registered as a complaint by us, but we will indicate that the complaint was resolved with you. In these cases, you will receive an email from the Client Care team acknowledging the interaction and that your complaint was resolved. If this is not your understanding of the interaction and you wish to pursue the complaint further, you will be provided with all the means necessary to register the complaint directly with the Client Care team for further action and to proceed through the NobleOak IDR process.

If you are not satisfied with how we have handled your concern and it remains unresolved the Client Services Team member will direct you to our Complaint process and specifically how to raise a complaint with our Client Care Team, they can also action this for you on your behalf straight away. Client Care will acknowledge your Complaint within 24 hours (or 1 Business Day) of receiving it, or as soon as practicable.

You may choose to contact the Client Care Team to register and discuss your complaint yourself.

You can contact them in the following way:

ONLINE Complete the online complaint registration form on our website at: www.nobleoak.com.au/complaints and submit your complaint directly to our NobleOak Client Care Team.

EMAIL clientcare@nobleoak.com.au

PHONE Call the NobleOak Client Care team on 1300 396 455

MAIL GPO Box 4793, Sydney NSW 2001

To assist us deal with your complaint quickly, please include the following information:

- Your name and contact details, including your daytime phone number and email address;

- Your policy number (if applicable)
- Details of your complaint; and
- Your desired outcome.

4. NobleOak's approach to receiving complaints.

NobleOak takes a proactive approach to identifying and receiving complaints.

1. We will not discourage you from making a Complaint.
2. If you make a Complaint to us and we are unable to resolve it when you first contact us, we will direct you to our Complaints process (and we will tell you how you can access the Life Insurance Code of Practice).
3. We will always respond to or attempt to resolve your concern when it is clearly requested of us to do so.
4. You are not required to expressly state the word 'complaint' or 'dispute', or put your complaint in writing, to trigger NobleOak's IDR procedure to be enacted.
5. You are able to make or pursue your complaints via the NobleOak's IDR process completely free of charge.
6. If you require assistance in making a complaint this will also be provided by NobleOak for you at no charge.
7. NobleOak will always allow a representative to lodge a complaint on your behalf. Such representatives might include financial counsellors, legal representatives, family members or friends. NobleOak will not put in place barriers to accepting authorities from these representatives. Once NobleOak is notified that you have a representative, we will not contact you directly unless:
 - i. You specifically request direct communication with NobleOak.
 - ii. NobleOak reasonably believes that the representative is acting against your best interest.
 - iii. NobleOak believes that the representative is acting in a deceptive or misleading manner
 - iv. NobleOak reasonably believes that the representative is not authorised to represent the client.
8. All of our employees are trained in the appropriate way to handle your complaint. You can expect an employee of NobleOak who receives a complaint from you to do so courteously and with a helpful attitude.
9. If you tell us that you have a concern about someone who is not our Authorised Representative, we will tell you how to have the matter addressed.

5. If you need assistance

If you are deaf or have a hearing or speech impairment, you may wish to contact the National Relay Service.

If you require assistance with translation and Interpreting, 'Translation and Interpretation Services' provides interpreting services to people who do not speak English and to agencies and businesses that need to communicate with their non-English speaking clients. Translation and Interpretation Services' can be contacted on 1300 000 795.

If there are any other assistance you may require interacting with us please do let us know and we will work with you to assist you in interacting with us.

Further information about assistance that NobleOak can provide can be found on our website at <https://www.nobleoak.com.au/about-us/how-can-nobleoak-support-you/>

6. NobleOak's Internal Dispute process

In dealing with complaints, our Client Care Team will do the following:

1. Acknowledge receipt of your complaint within **1 Business Day** of receiving it, or as soon as practicable either verbally or in writing. Where possible we will take into account the method used by you to lodge your complaint and any preferences you may have expressed about how we communicate with you on this matter;
2. Assign a person to your Complaint who will not be the person or people whose decision or conduct is the subject of your Complaint;
3. Give you the name and contact details of the person assigned to or dealing with your complaint;
4. Review your complaint on the day of receipt, assess and prioritise your complaint in terms of criteria such as severity, complexity, impact, urgency and the necessity and possibility of immediate action. As required, we will confirm the nature of your complaint with you and clarify any matters. Complaints that would be prioritised would include those where NobleOak becomes aware of matters concerning individuals:
 - Experiencing domestic or financial abuse;
 - Who have a serious or terminal illness; and
 - Where any delay in addressing the complaint could adversely affect the individuals basic living conditions.
5. The NobleOak Client Care team may:
 - assign the complaint to an appropriate NobleOak manager nominated to investigate and recommend a resolution to the complaint;
 - alert the Risk and Compliance Manager to any concerns that they have in relation to the severity, complexity, or ability to meet the required timeframes for the complaint as soon as possible;
 - seek advice or guidance in relation to a complaint as required from the Risk and Compliance Manager or Chief Operating Officer.
6. Outline to you the actions to be taken by us to consider or investigate your complaint and provide you with details of the complaint process and decide an agreed time frame to get back to you;

7. Oversee the internal escalation at NobleOak to review your complaint and if we find any errors or mistakes have been made in the handling of your matter then we will address these promptly;
8. Only ask for, and rely on information relevant to the complaint investigation in our complaint response to you; and
9. Check if you require any additional support in progressing your complaint including a support person nominated by you to assist you.

7. Timeframes and decision making

7.1 Resolution within 30 calendar days

We will always attempt to finalise our decision and response to your complaint within **30 calendar days**. In some instances, we may be unable to resolve your complaint in 30 calendar days if we need to access archived data or due to circumstances beyond NobleOaks control (such as waiting for medical reports).

If the review of your complaint is likely to take longer then we will let you know the reasons for the delay in writing and attempt to agree a longer timeframe with you. If you agree to that longer timeframe, then we will work within that timeframe keeping you updated along the way.

If you do not consent to a longer timeframe, or we are not able to resolve your complaint to your satisfaction, you can take your complaint to the Australian Financial Complaints Authority (AFCA), an independent and external dispute resolution service.

7.2 Progress updates

NobleOak Client Care will always seek to provide you regular updates on the progress of your complaint. We may do this verbally or in writing via email. We will always attempt to communicate with you in the method and frequency that suits you.

When we have finalised our investigation, we will contact you to explain the steps taken in our investigation, our views on the resolution of your complaint and confirm your satisfaction with that resolution.

7.3 Final Written Response

We will always provide you with a final written response to your complaint advising our resolution decision and the reasons for that decision when:

1. Your complaint is not resolved within **5 business days** of registration.
2. Your complaint is in relation to financial hardship, a declined insurance claim, the value of an insurance claim.
3. You specifically request a written response.

The final written response provided to you will always include:

1. The final outcome of your complaint at IDR (either confirmation of actions taken by NobleOak to fully resolve the complaint or reasons for rejection or partial rejection of the complaint);

2. Your right to take the complaint to AFCA if you are not satisfied with the IDR response; and
3. The contact details for AFCA.

The level of detail in a NobleOak final written response will always reflect the complexity of the complaint and the nature and extent of any investigation conducted.

Should you wish to be provided with documents and information that we have relied on in assessing your complaint these will be provided to you (or your doctor as required) within **10 business days**.

7.4 Complaints about declined or closed claims

1. When we give a client our final decision in respect of the Complaint about a declined claim, or about the value of a claim, we will explain what we will do regarding their claim which will be one of the following:
 - Reopen or reassess the claim
 - Maintain our original decision, or
 - Overturn our original decision
2. If our final decision about the Complaint is that we will reopen or reassess the claim, we will also confirm the name and contact details of the Claims Assessor assigned to liaise with the client.

7.5 Resolution

When determining whether a complaint has been resolved to your satisfaction, NobleOak will consider whether you have confirmed (verbally or in writing) that you are satisfied with the action(s) taken in response to the complaint and do not wish to take the matter further; or

In certain circumstances where a refund, fee waiver, correction of records, or an ex-gratia compensation payment is payable, NobleOak may request you to sign a Deed or statement which acknowledges that the complaint has been resolved, and releases NobleOak from any further liability in connection with the complaint.

8. Australian Financial Complaints Authority (AFCA)

If we can't resolve your complaint to your satisfaction or you are unhappy with the NobleOak IDR process, you can refer the matter to the Australian Financial Complaints Authority (AFCA) whose role is to help financial industry clients resolve complaints they have been unable to resolve with the financial institution they are dealing with.

If the terms fall within the jurisdiction of AFCA, you can lodge your complaint at:

Australian Financial Complaints Authority
GPO Box 3
MELBOURNE VIC 3001

Telephone: 800 931 678 (free call)

Email: info@afca.org.au

Website: www.afca.org.au

AFCA will investigate your complaint and make a determination that is binding on NobleOak.

9. Privacy

NobleOak will ensure processes and systems are in place to comply with our obligation under privacy laws when dealing with complaints.

NobleOak will ensure that your personal information is collected and used strictly for the purpose of addressing the complaint. Personal information will be actively protected from disclosure unless you have consented to its disclosure, or the disclosure is required by law.

NobleOak's Privacy Policy applies to the collection, disclosure, storage and use of such personal information. NobleOak will not provide information in an IDR response that would breach NobleOak's privacy or other legislative obligations.

When responding to a complaint made on social media, NobleOak will ensure that client privacy is always protected.

For further information on NobleOak Privacy Policy please go to <https://www.nobleoak.com.au/privacy-policy/>

10. If you have any questions

Please feel free to contact us at NobleOak if you have any questions regarding this Public Complaints Handling Policy.

Website: Submit a question online at <https://www.nobleoak.com.au/contact-us/>

Call: 1300 551 044 between 8.00am-8.00pm Mon-Thu or 8.00am-6.00pm Fri (AEST)

Email: enquiry@nobleoak.com.au and we'll get back to you within 1 business day

Mail: NobleOak Life Limited, GPO Box 4793, Sydney NSW 2001