

Howden Employee Benefits & Wellbeing ('HEBW')

Complaints Procedures

The Financial Conduct Authority (FCA) defines a complaint as 'any oral or written expression of dissatisfaction, whether justified or not'.

The complaint may be about the provision of, or failure to provide, a financial service from which you allege to have suffered or that you may suffer a financial loss, material distress or material inconvenience. The FCA defines material as meaning 'significant and relevant'.

Oral or written includes the following:

- In person
- By telephone
- By fax
- By letter
- By email.
- Via 'social media' site (e.g. the firm's LinkedIn group, Twitter or Blog, etc.)

A "complaint", for the purposes of FCA rules, includes any complaint, which alleges:

- Breach of the FCA Rules or Guidance
- Failure to comply with any obligation arising under, or by virtue of the Financial Services and Markets Act 2000
- Negligence, a breach of a term of any customer agreement or any enactment of other rule of law, which may be applicable to HEBW's business
- Misrepresentation, acting in bad faith or other malpractice

You may make a complaint if:

- You are or have been a customer of HEBW or any legacy company of HEBW, (a legacy company means a company that HEBW has merged with or purchased in the past).
- It is also possible to make a complaint without being a customer of HEBW if the complaint arises out of HEBW's actions or failure to act for you, in your capacity as a potential customer.

How to make a complaint

If you wish to complain, you may advise any member of our staff or contact us by:

Telephoning: 020 3327 5700

Writing to:

Howden Employee Benefits & Wellbeing,
Compliance,
One Creechurch Place,
London,
EC3A 5AF

Emailing: compliancehuk@hyperiongrp.com

Initial response

When a complaint is made, you do not have to confirm your complaint in writing. We will confirm our understanding of your complaint in writing to you when we acknowledge your complaint. Where we are able to resolve your complaint to your satisfaction by close of business on the third business day, following the day on which it is received, we will send you a letter of *Summary Resolution Communication*.

Where we feel we are unable to resolve your complaint to your satisfaction within the above timescales, HEBW's Compliance team will issue a letter of acknowledgement together with a copy of HEBW's complaints procedures to you upon receipt of your complaint. The letter will confirm the nature of your complaint as we understand it and the name and job title of the person handling your complaint.

Complaints involving other firms

Where HEBW has reasonable grounds to be satisfied that another firm may be solely responsible for the fault alleged in a complaint, it will refer the complaint to that other firm and will:

- make the referral in writing; and
- inform you of the referral by way of a final response and include the other firms' contact details

Where HEBW has reasonable grounds to be satisfied that another firm may be jointly responsible for the fault alleged in a complaint, it will refer the complaint to that other firm and will:

- make the referral in writing;
- inform you of the referral and include the other firm's contact details;
- comply with the obligations outlined below as to the investigation of that part of the complaint that is HEBW's responsibility; and
- inform you of the outcome with a formal final response letter

Final or other response within 8 (eight) weeks

The Compliance team on behalf of HEBW Limited will, by the end of 8 (eight) weeks after receiving your initial complaint, send you either:

- 1) A 'final response letter', which will detail our investigations and the reasons why we are:
 - a) Upholding your complaint with an offer of appropriate compensation; *or*
 - b) Rejecting your complaint.

If you are unhappy with the outcome, you *may* be able to refer the matter to the *Financial Ombudsman Service* (FOS) provided you meet the requirement of being an '*eligible complainant*', details of which are outlined below. FOS will then investigate the complaint and provide their adjudication as to whether to uphold or reject your complaint.

You will have 6 (six) months from the date of our final response letter to seek adjudication from the FOS. Where we have identified you as an 'eligible complainant' our letter will also enclose a copy of the FOS explanatory leaflet and their contact details.

Or

2) A 'holding letter' response which

- a) Explains why HEBW are still not in a position to provide you with a final response, giving our reasons for the further delay, and indicating a timescale of when we expect to be able to provide you with a final response.
- b) In addition, and provided we have identified you as an 'eligible complainant', will:
 - inform you that you can refer your complaint to the FOS if you are dissatisfied with the delay
 - Enclose a copy of the FOS explanatory leaflet and their contact details.

Referral to FOS

If we have been unable to resolve your complaint to your satisfaction you may ask FOS to investigate and adjudicate on your complaint, provided that you are an 'eligible complainant' as categorised below:

Eligible complainants

- A private individual (which includes employees under a group policy taken out by their employer) at the time the complaint is made
- A 'micro-enterprise' which employs fewer than 10 people and has a group annual turnover or annual balance sheet of less than €2 million at the time the complaint is made
- A 'small business' which has an annual turnover of less than £6.5 million, and either employs fewer than 50 persons or has a balance sheet of less than £5 million
- Charities, which have an annual income of less than £6.5 million at the time the complaint is made
- Trustees of a trust, which has a net asset value of less than £5 million at the time the complaint is made
- Authorised representatives acting on behalf of the above

Ineligible complainants

If you are in doubt about whether you are an eligible complainant for FOS purposes you should contact the Compliance team who will determine whether HEBW categorises you as an eligible complainant.