

Our complaints policy

1. Purpose

Scottish Equitable, Aegon Investment Solutions Limited (AISL), Cofunds Limited and Stonebridge International Insurance Ltd (SIIL) – referred to as Aegon throughout this document – are authorised and regulated by the Financial Conduct Authority (FCA) in the United Kingdom.

The FCA sets specific rules and regulations for how authorised firms must handle and resolve complaints in respect of its regulated activities from its customers. This aspect of a firm's customer service is also directly relevant to a firm's overall capability and effectiveness in treating customers fairly as complaints must be dealt with promptly and fairly.

Rules and regulations can be found in more detail under www.handbook.fca.org.uk/handbook/DISP.pdf

2. Scope of policy

What is a complaint?

We use two terms to describe complaints. Both are recorded and reported on internally.

- a. **Expression of dissatisfaction** – '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.'
- b. **Complaints** – 'Any expression of dissatisfaction, whether oral or written, and whether justified or not, from or on behalf of an eligible complainant about the firm's provision of, or failure to provide, a financial service **and alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience.**'

Complaints for eligible complainants are reported to the FCA.

Who can complain?

A complaint can be made by any customer or potential customer using any of Aegon's financial services.

Note: Any services provided to the AUK Group by an outsourced provider will follow their own internal complaints process but whilst they'll manage their process we'll provide oversight to ensure that their values/principles are in line with Aegon UK Complaints Policy.

How can customers complain to Aegon?

Customers can complain to Aegon by:

- email;
- online;
- letter;
- phone, or
- verbally for example during a personal visit.

How do we view complaints in Aegon?

Complaints are a source of customer feedback and an opportunity to identify how to improve our performance. The benefits are:

- Ensuring that customers can be confident that they're dealing with a company who has the customer central to its corporate culture.
- Customer reassurance that their opinion matters.
- Identification of any problems, trends of potential customer detriment or lack of understanding, and taking action to put things right.
- Rectifying potential problems before they become an issue for other customers or colleagues.
- Higher levels of customer satisfaction and recommendations to other potential customers.
- Encourages or rebuilds customer loyalty.
- Demonstrates we're committed to continuous improvement.
- Encourages or rebuilds customer loyalty.

3. Key requirements

How do we deal with complaints?

We want to make it easy for customers to complain and want to be reasonable towards our customers, seeing their side and treating them as we would like to be treated.

Sometimes we don't get things right and when this happens, we want to encourage our customers to tell us about their concern so we can put it right.

We'll investigate complaints fairly, consistently and promptly, determine whether we've done something wrong and ensure the appropriate action and redress is made. We'll set out our conclusions to complainants in a final response.

The FCA, as part of its move towards more outcome based regulations, has set out a requirement for all financial services organisations to evidence and demonstrate they're consistently treating their customers fairly.

Within the FCA Handbook there are 11 high level principles. Principle 6 states that 'A firm must pay due regard to the interest of its customers and treat them fairly'.

The FCA has also said that firms must measure whether they're treating their customers fairly against six consumer outcomes. We look to deliver these by understanding our Future Fit value of 'Customer Centricity' and living this through our culture and training.

Our purpose is to help our customers achieve a lifetime of financial security. To do this our customers must feel we put them at the heart of everything we do, to please our customers and exceed their expectations.

This is core to our Future Fit value of 'Customer Centricity' in our complaint handling. We demonstrate this by driving our behaviours to:

- treat customers consistently bearing in mind the individual facts of each complaint and the business model the customer belongs to;
- being clear simple and transparent in what we do and say;
- ensure there are no barriers in place for customers to submit a complaint;
- put ourselves in the customer's shoes and treat them as we would wish to be treated, and
- put things right for the customer when they complain and learn from our mistakes.

We achieve this by carrying out the following activity.

Record the life of every complaint

We record all complaints at the earliest opportunity to fully and accurately capture these details:

- Receipt – where and when we received the complaint
- Complaint categorisation code – to tell us what the complaint is about
- Ownership – who dealt or is dealing with the complaint
- Progress – update on current position
- Investigation detail and outcome
- Resolution and follow up action
- Compensation, refund and reimbursement payments made
- Customer feedback
- Regulatory requirements
- Root cause
- Details of any referrals to an ombudsman and full records of our correspondence on the complaint, including the decision, post final resolution settlement
- We retain all complaint records for a minimum of six years however there may be instances where we may elect to retain them longer.

Resolve all complaints first time, every time

- We aim to resolve all complaints within the timescales set by the FCA.
- We manage and exceed our customers' expectations by:
 - showing a positive attitude to complaint resolution;
 - agreeing and meeting realistic timescales for updates and resolution;
 - providing regular updates on progress;
 - using the customers preferred method of communication, and
 - resolving the complaint.
- We empower our colleagues by giving them appropriate authority to own and resolve complaints at first point of contact wherever possible.
- Our colleagues understand our complaint handling procedures and have the skills to deal with customers who complain.
- The person investigating or managing the complaint has sufficient competence and independence to make a fair and unbiased assessment.
- Our colleagues receive clear guidance on when and how to refer complaints through the escalation procedure.
- Our colleagues ensure that customers are made aware of any rights to take their complaint to an independent arbitration service.
- We have defined hand-off processes and systems agreed and implemented between our departments to provide a seamless service to customers.
- On a six monthly basis we provide detail on our complaints on our customer websites and also to the Financial Conduct Authority.

Rescue Customer Loyalty

- We give customers the benefit of doubt where it would seem fair to do so.
- We reimburse customers who have suffered a financial detriment as a result of our error fairly and quickly.
- We compensate customers who have suffered trouble or inconvenience fairly and quickly.
- We identify frequent problems involving our systems, processes, products and policies and implement actions to resolve them. Where appropriate we also ensure action is taken on behalf of customers affected who haven't complained.

How do we communicate with complainants?

There are specific rules covering how we should handle regulated complaints, set out in the www.handbook.fca.org.uk/handbook/DISP.pdf

Where we've been unable to resolve a customer's concern as an expression of dissatisfaction there are certain time limits we must follow. The FCA rules require that if we resolve a complaint by business day three we must issue a summary resolution communication to the customer by letter, email or text.

Complaints must be acknowledged promptly and the customer should be kept updated on the progress of their complaint. The rules also state that we should issue our final response no later than eight weeks. If we're unable to do so, a written response via letter or email must be sent to the customer explaining why we're unable to do so, provide an idea of timeframe and advise the customer they can now refer their complaint to the Ombudsman.

We've developed our own set of standards to ensure we meet these requirements.

We'll contact our customers via their preferred method of communication.

Business day 1

We aim to resolve concerns immediately and at the first point of contact. If complaints are resolved at first point of contact immediately a summary communication summary is issued by email or letter whichever is the customer's preferred method of communication.

Business day 3

For any complaints which can't be resolved immediately we aim to resolve them by working day three after date of receipt. These customer will be issued with a summary resolution communication by email or letter on resolution whichever is their preferred method of communication. This will include their right of escalation to the Pensions or Financial Ombudsman.

Business day 6

If we're unable to resolve the complaint at this stage we will aim to issue a written acknowledgement by email/letter by close of business of working day 6 at the latest. This will include our complaints procedure. We'll contact the customer by phone to agree a contact strategy with them regarding updating them and resolution. If we're unable to contact them by phone, we'll email them or if no email address is available, we'll write to them by post.

After business day 6

Updates to the customer will be at a frequency agreed with them and by their preferred method of communication. We'll advise why we've not been able to resolve their complaint and when we hope to be able to do so. If we're unable to contact the customer by phone we'll update them at least every 10 working days.

Business day 40

In exceptional circumstances where a complaint is particularly complex it may take over 40 business days to resolve. If a complaint isn't resolved by business day 40 we'll email/write to the customer requesting more time and explaining why we're not able to provide a response.

We'll also advise the customer they've the right to refer their complaint to the Pensions or Financial Ombudsman if they're unhappy we're still not in a position to reply. We also advise them of the time limit of six months by which they have to refer their complaint to the Financial Ombudsman from the date of our response. If referring the customer to the Pensions Ombudsman the time limit is three years from the date of maladministration.

4. Contact point for queries or guidance

Donna Addison, Head of Complaints Aegon UK



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