

Complaints and Internal Dispute Resolution Policy

Version: 3.0

Date: December 2025

Owner: Compliance Manager

Next Review Date: December 2026

Purpose

At Imalia we are committed to providing high-quality products and services and to handling complaints fairly, efficiently and promptly.

This policy outlines how complaints are managed and resolved in accordance with:

- Corporations Act 2001
 - ASIC Regulatory Guide 271 (Internal Dispute Resolution)
 - General Insurance Code of Practice (where applicable)
 - Australian Financial Complaints Authority (AFCA) Rules
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What is a Complaint?

A complaint is:

An expression of dissatisfaction made to or about our organisation, related to our products, services, staff, representatives, claims handling or complaints handling process, where a response or resolution is explicitly or implicitly expected.

Complaints may be made verbally, in writing, by email or through any other communication channel.

How to Make a Complaint

Complaints may be lodged by:

Email: cap@imalia.com.au

Post: Imalia Pty Ltd-640 Mt Hercules Rd Razorback NSW 2571

Attention: Complaints Officer

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Phone: 0438 630 315

When making a complaint, please provide:

- Your name and contact details
- Policy or claim number (if applicable)
- Details of the complaint
- Copies of any supporting documents
- The outcome you are seeking

You may appoint a representative to act on your behalf.

Our Commitment

We will:

- Treat complainants with respect and courtesy.
 - Handle complaints fairly and objectively.
 - Investigate complaints thoroughly.
 - Consider all relevant information.
 - Communicate clearly and regularly.
 - Provide reasons for our decisions.
 - Identify and correct any errors promptly.
 - Use complaints as an opportunity to improve our services.
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Complaint Handling Process

Step 1 – Acknowledgement

We will acknowledge receipt of your complaint as soon as practicable and generally within one business day.

Acknowledgement may occur verbally or in writing.

Step 2 – Investigation

A suitably trained staff member who was not directly involved in the matter where possible will:

- Review the complaint
 - Gather relevant information
 - Consider applicable legislation, policy terms and procedures
 - Contact you if further information is required
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Step 3 – Resolution

We aim to resolve complaints as quickly as possible.

Where appropriate we may:

- Provide an explanation
 - Correct an error
 - Apologise
 - Review a decision
 - Offer a remedy
 - Implement corrective action
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Internal dispute resolution -Lloyd's

Our insurers have an internal dispute resolution process to achieve the highest service to our Australian policyholders.

About Lloyd's

Lloyd's is the world's specialist insurance and reinsurance market, bringing together an outstanding concentration of underwriting expertise and talent. In Australia, Lloyd's is proud to be a member of the Insurance Council of Australia.

Lloyd's has adopted the General Insurance Code of Practice subject to certain specific qualifications.

You can obtain a copy of the General Insurance Code of Practice at www.codeofpractice.com.au.

To achieve our customer service goal we have developed the following procedures for the fair handling of complaints from our policyholders.

How can we help you? There are established procedures for dealing with complaints and disputes regarding a policy or claim.

Policyholders may be able to take advantage of these complaints services.

1. We will acknowledge your complaint within 1 business day. We will respond to complaints within 10 business days provided we have all necessary information and have completed any investigation required.
2. In cases where further information, assessment or investigation is required we will let the complainant know as soon as reasonably practicable within the 10 business day timeframe and agree reasonable alternative time frames. If we cannot agree, we will treat the complaint as a dispute and we will advise you of your rights.
3. We will keep you informed of the progress of our response to the complaint at least every 10 business days, unless agreed otherwise.
4. When we respond to the complaint, we will respond in writing and will tell you our decision in relation to the complaint and the reasons for our decision.

In the unlikely event that this does not resolve the matter or you are not satisfied with the way their complaint has been dealt with, you may contact: Lloyd's Australia Limited PO Box R1745 Royal Exchange NSW 1225. T: (02) 8298 0783 E: ldraustralia@lloyds.com

You will need to provide the following information:

- Name, address and telephone number of the policyholder;
- Details of the policy concerned (policy and/or claim reference numbers etc);
- Details of the insurance intermediary through whom the policy was obtained;
- Reasons why you are dissatisfied;
- Copies of any supporting documentation you believe may assist us in addressing your dispute appropriately

Following receipt of the complaint, you will be advised whether the matter will be handled by: Lloyd's Australia or the Lloyd's Complaints team in the UK or what other avenues are available to you:

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- Where the complaint is eligible for referral to the Australian Financial Claims Authority (AFCA), the complaint will generally be reviewed by a person at Lloyd's Australia with appropriate authority to deal with the dispute.
- Where the complaint is not eligible for referral to AFCA, Lloyd's Australia will refer the complaint to the Lloyd's Complaints team in the UK if it falls within the jurisdiction of the UK Financial Ombudsmen. They will review the complaint and liaise directly with you. For all other matters you will be advised of what other avenues may be available to

Internal Dispute Resolution (IDR) (Not Lloyd's)

Where a complaint cannot be resolved immediately, it will enter our Internal Dispute Resolution process.

We will provide a written IDR Response that includes:

- The outcome of our investigation
- Reasons for our decision
- Reference to any relevant information relied upon
- Information about external dispute resolution rights

Timeframes

We will comply with ASIC RG271 requirements.

Generally, we will provide an IDR Response within:

Complaint Type	Maximum Timeframe
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Standard Complaints	30 calendar days
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Where permitted by law and exceptional circumstances apply, we will advise you of:

- The reason for the delay
- Your right to lodge a complaint with AFCA

Access to Information

We will provide access to information relied upon in making our decision unless:

- Disclosure is prohibited by law;

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- It would unreasonably impact another person's privacy;
- Fraud investigations or legal proceedings prevent disclosure.

Where information cannot be released, we will explain why.

External Dispute Resolution

If you are not satisfied with our final response, or we do not resolve your complaint within the required timeframe, you may lodge a complaint with:

Australian Financial Complaints Authority (AFCA)

Website: Australian Financial Complaints Authority

Phone: 1800 931 678

Email: info@afca.org.au

Postal Address:

GPO Box 3

Melbourne VIC 3001

AFCA provides independent and free dispute resolution services for eligible consumers and small businesses.

Cost

There is no charge for lodging a complaint or participating in our Internal Dispute Resolution process.

AFCA's service is also free to consumers.

Complaints Register

All complaints will be recorded in a Complaints Register including:

- Date received
- Complainant details
- Nature of complaint
- Responsible officer

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- Actions taken
 - Resolution date
 - Outcome
 - Root cause analysis
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Continuous Improvement

Complaint data will be reviewed regularly to:

- Identify recurring issues
- Improve customer outcomes
- Enhance products and services
- Strengthen compliance processes
- Reduce future complaints

Significant complaint trends will be reported to senior management and the Board.

Policy Review

This policy will be reviewed at least annually or sooner if required by legislative, regulatory or business changes.

Approved By: Carole-Anne Priest

Position: Director

Date: December 20205