



Complaint Guidelines

These guidelines apply to all individuals working at all levels and grades within EC3 Marine Ltd. Including directors, senior managers, officers, employees (whether permanent, fixed term or temporary), trainees, seconded staff, homeworkers, casual workers, agency staff, volunteers and interns. However, we also expect that all of our business partners globally conduct their business ethically and that they too comply with these guidelines.

V6.0 August 2025

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EC3 Marine is a Private Limited Company. Registered in England No. 08259392. Registered Office: 57 Windmill Street, Gravesend, Kent DA12 1BB.

1. Introduction

It is important that complaints made against the EC3 Marine Ltd are handled quickly, fairly and in accordance with FCA requirements.

If you receive a complaint from an Insured, Claimant, Broker, Principal, etc. that you should follow the guidance set out below.

1.1 A Complaint defined by the FCA

The FCA defines a complaint as *'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'*.

2. Initial steps

Complaints do not need to be made in writing; The complainant should be allowed to make a complaint by any reasonable means, including telephone, email or in person. A complainant can be made by the eligible complainant or by a representative on their behalf. An eligible complainant is defined as one who would be eligible to refer their complaint to the FOS

2.1 Complaints Authority Framework Associated with an Agreement

As per the Markel/Geo Specialty Marine Trades DCA Agreement, **Markel must be notified of any complaints related to the subject agreement** as set out in Clause 20.0 "COMPLAINTS" and Schedule 7 "POLICYHOLDERS COMPLAINTS HANDLING PROCEDURES" of that agreement. Please also refer to the "GEO Marine Complaints Register, Markel DCA Agmt – Complaints tab".

2.2 Complaints made orally

If you receive a complaint whilst speaking to an Insured, Claimant, Broker, Principal etc. which you cannot resolve immediately within the scope of your authority you should ask that party to put their complaint in writing and send it to EC3 Marine's Head Office.

2.2 Encourage the Complainant to include all details of their complaint and copies of all relevant correspondence and other supporting information. The Complainant may wish to communicate by post, fax or email. Provide the Complainant with the relevant contact details as follows:

Senior Management
EC3 Marine Ltd
6 Bevis Marks
London EC3A 7BA
Tel. No. +44 (0)20 3859 9199
e-mail: operations@ec3marine.com

2.3 Where you are unable to resolve a complaint, you must immediately inform Senior Management of this fact. Similarly, you should alert Senior Management that a Complainant is expected to submit a written complaint.

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2.3.1 Complaints that are able to be resolved immediately should still be notified to Senior Management together with a copy of the response/file note of the complaint and response.

2.4 Complaints made in writing

If you receive a written complaint from an Insured, Claimant, Broker, Principal etc., date stamp it and inform Senior Management. It should then be provided to the appropriate Senior Manager who will log it on the register and decide who is best placed to deal with it.

2.5 A letter will then be sent to the Complainant acknowledging the complaint and providing a copy of these guidelines, together with the 'rights of referral' wording (see paragraph 4.2 below).

2.6 A person who is the subject of a complaint should give care consideration as to whether he or she is an appropriate person to deal with the complaint. Legal advice should be sought if necessary.

2.7 The FCA requires complaints to be resolved speedily at the earliest stage possible. Managers must decide and, if necessary, agree with other interested managers who will deal with a complaint as soon as possible. The acknowledgement letter provides 10 working days in which to respond to the complaint, and this is monitored by the Senior Management.

3. Investigating the complaint

3.1 If you have agreed or been asked to deal with a complaint, you should investigate the complaint thoroughly and fairly and you should speak to any of your colleagues referred to in the complaint.

3.2 If you were involved in the matter about which the complaint is made you should make arrangements to have your investigation reviewed by someone who was not.

3.3 You should aim to respond to the complainant within 10 working days from its receipt. If you cannot do so, you should send a letter to the Complainant within this period explaining why and indicating when a substantive response will be sent.

3.4 If it becomes apparent that you will not be able to respond substantively to the Complainant **within four weeks** from its receipt, you should send a letter to that party within this period explaining why and indicating when a substantive response will be sent. In your letter you should remind the Complainant that they have the right to refer their complaint to Insurance Ombudsman and you should state again where the Complainant may find details of the Insurance Ombudsman Scheme (see paragraph 4.2 below).

3.5 Copies of any responses to the Complainant must be provided to Senior Management.

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4. Written responses

- 4.1** You should prepare a written response to the complainant setting out the findings of your investigation and whether you accept their complaint or whether you reject it. If you reject the complaint, you should give reasons for your decision.
- 4.2** Your response must include the following paragraph: *"If you are dissatisfied with this response, you may be able to refer your complaint to The Financial Ombudsman at the following e-mail address complaint.info@financial-ombudsman.org.uk"*
- 4.3** You should discuss your response with Senior Management. In particular, you must discuss any proposed offer of financial or other redress with the Manager. Depending on the size and reason for the proposed payment, he or she should then consider seeking legal advice regarding the implications of that offer.
- 4.4** Where financial redress is considered appropriate, the aim should be to restore the Complainant to the position he or she would have been in if the acts or omissions giving rise to the complaint had not occurred. The redress should therefore include an appropriate amount of interest in addition to the principal sum.
- 4.5** Any redress accepted by the complainant should be provided promptly.

5. Record keeping

- 5.1** You should create a file on the complaint which should contain copies of all correspondence and relevant notes of discussions relating to your investigation of the complaint. Arrangements should be made for this file to be retained for a period of three years from the date of the last item of correspondence on it. So far as possible complaints files should be stored in digital form to save storage costs and for ease of retrieval.
- 5.2** EC3 Marine Claims Complaint Report Form is saved to the P Drive.
- 5.3** Complaints are logged on the appropriate scheduled saved to the P Drive.

6. Reporting of complaints

- 6.1** At the conclusion of your investigation of the complaint you should prepare a brief note that contains the following information: the name of the complainant; the date of the complaint; a brief summary of the complaint; the date of your substantive response; whether the complaint was rejected or resolved; and details of any redress provided to the Complainant.
- 6.2** If during the course of handling a claim a complaint is raised, EC3 Marine Claims Handlers will bring the complaint to the attention of the Principle in a timely manner.

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