

Complaint Handling Procedure Consumer Protection Regulations 2026



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Approved By	Máire McSherry (Head of Compliance)
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Procedure Owner	Kieran Tuke

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30/03/2026	1.0	New policy aligning with the CPC 2026.	Máire McSherry

1. Purpose

This procedure covers Frank Glennon Life and Pensions Ltd trading as Glennon, Arachas Employee Benefits, Arachas Financial Planning, Glennon Financial Planning, Glennon Employee Benefits referred to in this document as (AEB) and its approach to handling complaints. This document defines the approach to be complied with and is applicable to colleagues interacting with customers and consumers.

The objective of this procedure is to:

- Define our approach to managing complaints.
- Provide a specific procedure which is aligned to industry best practice and complies with the below regulations.

2. Scope

This procedure applies to all functions across AEB and articulates minimum standards which are at least equivalent to those required by Irish regulation and legislation. Businesses outside of Ireland must also comply with these standards at a minimum, or those of domestic legislation and regulation if the latter are more rigorous.

This procedure applies to all individuals in the following categories providing services to the company:

- all employees;
- agency workers (i.e. temporary staff placed by recruitment agencies);
- self-employed or contract workers;
- any individual on work experience (including interns).

This procedure also applies to joint ventures, partners and outsourced service providers undertaking relevant functions on behalf of AEB businesses and operations irrespective of the jurisdiction in which the activity is undertaken.

3. Summary of Legal and Regulatory Requirements Governing this Procedure

The legal and regulatory requirements governing this procedure are set out in the:

- a) Central Bank Reform Act 2010 (Section 17a) (Standards for Business) Regulations 2025.
- b) Central Bank (Supervision and Enforcement) Act 2013 (Section 48) (Consumer Protection) Regulations 2025.
- c) European Union (Insurance Distribution) Regulations, 2018.

4. Procedure Review

This procedure will be monitored and reviewed on a regular basis to ensure that it meets its objectives and takes account of any regulatory and internal process changes.

5. Background

AEB, as a regulated entity is bound by the provision in the above Standards for Business, which requires us to resolve any complaints received from customers efficiently, fairly and in a timely manner.

The provisions for handling complaints as set out in Chapter 12 General Requirements can be found in Appendix I.

6. Our Complaints Policy

It is the policy of AEB to ensure that:

- a) All complaints are dealt with in an efficient, fair and timely manner and that problems are resolved as quickly as possible.
- b) Our objective in dealing with complaints is to respond fully to the issues raised and at the same time endeavour to resolve the complaint to the Complainant's satisfaction and to bring the case to a conclusion efficiently and promptly.
- c) However, we receive a complaint, e.g. orally or in writing, we will handle the complaint in accordance with the procedure outlined below.
- d) All complaints once closed must be fully recorded by emailing compliance@arachasemployeebenefits.ie, with the completed complaint form and any complaint related correspondence detailing a full timeline of events and a detailed investigation of the complaint by the complaint handler including the root cause and the actions taken to attempt to resolve it and the resolutions put forward to the Complainant.
- e) All communications with the Complainant must be noted, updated, and all correspondence logged and attached to the relevant customer's files, if applicable.
- f) Adherence to this Complaints Policy and the Complaint Handling Procedure is subject to independent oversight throughout the handling process to ensure that complaints are managed in a compliant manner with the customer's best interests as the priority.

Any queries with respect to the handling of a complaint should be emailed to compliance@arachasemployeebenefits.ie for guidance and assistance.

7. Complaint Identification

A complaint is defined as an expression of grievance or dissatisfaction by a consumer, either orally or in writing, in connection with:

- a) The provision or the offer of the provision of a financial service to a consumer by a regulated entity, or
- b) The failure or refusal of a regulated entity to provide a financial service to a consumer.

A Complainant can be anyone, whether they have or have had a relationship with AEB; including:

- A current, past or potential customer.
- A person for whose benefit the insurance was taken out or was intended to be taken.
- A person who has a legal right to benefit from a claim under a contract of insurance.
- A person authorised by the eligible Complainant or authorised by law to bring a complaint on behalf of an eligible Complainant (or a deceased person who would have been an eligible Complainant).

A complaint can be received through any means including by post, electronic media, over the phone, face to face, via social media, or any other channel. This procedure applies to all complaints irrespective of the channel through which it is received.

The Consumer Protection Code defines a “consumer” as a customer that is -

- (a) a natural person,
- (b) a group of natural persons, including a partnership, club, charity, trust or other unincorporated body, or
- (c) an incorporated body, that is not –
 - (i) an incorporated body that had an annual turnover in excess of €5 million in the previous financial year, or
 - (ii) an incorporated body that is a member of a group of companies having a combined turnover greater than €5 million;

“customer” means, subject to paragraph (2) -

- (a) any person to whom a regulated entity provides or offers financial services,
- (b) any person who requests the provision of financial services from the regulated entity,
- (c) a relevant borrower in a case where a regulated entity undertakes credit servicing in respect of the credit agreement concerned, or
- (d) a hirer in a case where a regulated entity undertakes credit servicing in respect of the consumer-hire agreement or hire-purchase agreement concerned,

and shall include, where appropriate, a potential “customer” and former “customer” within the meaning above.

8. Complaint Escalation Paths

AEB complaints - In relation to complaints about the service provided by **AEB**, these should be escalated to the relevant Manager or Team Leader so that a Complaint Handler can be appointed to perform a full investigation into the nature of the complaint in accordance with the procedure outlined below. Complaints must be investigated and assessed competently, diligently, and impartially, obtaining additional information as necessary, with due consideration to the needs of customers in vulnerable circumstances.

Product Provider Complaints – In relation to complaints about the service, cover, premium or claims handling by **Insurers** or their representatives, these should be escalated to the relevant Manager or Team Leader who should notify the relevant party immediately. If deemed appropriate, a copy of the Complainant’s complaint should be forwarded to the party concerned with a request to be kept updated as to the complaints progress. Such notification should be recorded to the file.

9. Complaints Procedure

The first step in dealing with any complaint is to appoint a Complaint Handler who must be appropriately trained, resourced and experienced. The Complaint Handler should make contact with the Complainant by phone as quickly as possible to acknowledge the complaint and to establish the nature of the complaint and what may be required to resolve it.

Under 5 Working Day (Informal) Complaints

Where a complaint is resolved within 5 working days, details of the complaint, its resolution and confirmation that the Complainant is satisfied with the outcome must be recorded to the customer file and the **Under 5 Working Day CPC Complaint Form** completed and submitted on Engage so that the complaint can be correctly recorded on our Complaints Register.

Over 5 Working Day (Formal) Complaints

Where a complaint cannot be resolved to the Complainant’s satisfaction within 5 working days, we will:

1. Acknowledge each complaint in writing on or before the 5th working day of the complaint being received using the ‘Over 5 Day Complaint Acknowledgement Letter Template’
2. This acknowledgement letter will:
 - a. provide clear and complete details on how to access our complaints procedure online which is available at <https://www.arachasemployeebenefits.ie/complaints-procedure>.
 - b. advise the Complainant of the person nominated to be the Complainant’s point of contact until the complaint is resolved or cannot be processed any further,
 - c. commit to providing them with a response or an update within 20 working days,
 - d. inform them that where they are dissatisfied with our response to their complaint or where AEB is unable to resolve their complaint within 40 working days that they can refer their complaint to the FSPO and include the contact details of the FSPO.
3. Once the complaint is acknowledged complete and submit the **Over 5 Working Day CPC Complaint Notification Form** on Engage so that it can be added to the Complaint Register to allow its progress to be tracked.
4. It should always be our goal to issue our response within 20 working days of receiving the complaint, however failing this we should provide the Complainant with a regular written update on the progress of the investigation of their complaint at intervals of not greater than 20 working days, using the relevant 20 Day Holding Letter or 40 Day Holding Letter.
5. Where the 40 working days have elapsed and the complaint is not resolved, we will inform the Complainant of the anticipated timescale within which we hope to resolve the complaint and of the Complainant’s right to refer the matter to the Financial Services and Pensions Ombudsman (FSPO), and we will provide the Complainant with the FSPO’s contact details, using the relevant 40 Day Holding Letter.
6. Upon completion of our investigation, we must; within 5 working days; write to the Complainant using the Response Letter template on Engage. Our response must set out the outcome of the investigation and, where applicable, explain the terms of any offer or settlement being made. We will also inform the Complainant of their right to refer the matter to the FSPO where relevant and will provide the Complainant with the contact details of the FSPO as below. The Complaint Handler should not issue our Response Letter without first consulting with their TL/Manager.

7. If we do not receive a reply to our Response Letter within 10 working days, we can consider the complaint to be closed. You should then complete and submit the **Over 5 Working Day CPC Complaint Report Form** on Engage uploading all relevant correspondence received from or issued to the Complainant in respect of their complaint for addition to the Complaint Register.
8. Where the Complainant is dissatisfied with our response and wishes their complaint to be escalated further, the matter should be raised with the relevant Regional Business Manager / Director. Upon agreement, a Final Response Letter should be issued setting out our final position and advising the Complainant that if they remain dissatisfied, they should raise their complaint with the Financial Services and Pensions Ombudsman (FSPO).
9. Once our Final Response Letter is issued, we can consider the complaint to be closed. You should then complete and submit the **Over 5 Working Day CPC Complaint Report Form** uploading all relevant correspondence received from or issued to the Complainant in respect of their complaint for addition to the Complaint Register.

The Financial Services and Pensions Ombudsman (FSPO):

Address: 3rd Floor, Lincoln House, Lincoln Place, Dublin 2, D02 VH29

Tel: +353 1 567 7000

E-mail: info@fspo.ie

Website: www.fspo.ie

10. Complaint Procedure Training

All customer facing staff must have training on how to identify, handle and escalate a complaint. Training on this procedure is provided to all new staff and all M&A staff during their induction into AEB. Training for all existing staff is also provided on a regular basis. Mandatory training on complaint handling is provided annually via Dayforce learning and is required training for all customer facing staff.

11. Record Keeping

We will maintain an up-to-date record of all complaints which will contain the following information:

- (a) details of each complaint, to include the core reason for the complaint in order to facilitate analysis of the complaint by category;
- (b) the date that each complaint was received;
- (c) a summary of our response including the date of such response to the Complainant;
- (d) details of any other relevant correspondence or records;
- (e) the steps taken to resolve each complaint;
- (f) the date the complaint was fully resolved;
- (g) where relevant, the current status of a complaint which has been referred to the FSPO and the current status of an appeal of a decision from the FSPO.

12. Complaint Responsibility

Complaints should be handled and dealt with by the handler/department/team best placed to handle the complaint e.g. if a customer makes a complaint about their insurance on a social media site, then Marketing & Communications who track such sites should forward it to the relevant business department.

All complaints received must be escalated to the relevant line manager so that a suitable Complaint Handler can be appointed to deal with the Complaint. If the complaint cannot be resolved within 5 working days, the complaint must be formally acknowledged and notified to compliance@arachasemployeebenefits.ie.

13. Financial Services and Pensions Ombudsman

The FSPO will only deal with a complaint once we have issued the Complainant our Final Response Letter. The FSPO will not deal with a complaint if the incident that gave rise to it happened more than 6 years before the complaint was submitted to the FSPO or if the complaint has been, or is, before a court or arbitration tribunal. The FSPO does not deal with complaints from non-consumers.

On receipt of a complaint the FSPO will conduct an initial assessment and where they decide to progress the complaint to the informal stage of the FSPO Complaint Process; the Dispute Resolution Service; they will notify AEB in writing of this fact and advise that a Dispute Resolution Officer (DRO) will be appointed in a matter of weeks to handle the complaint and that the DRO will make contact with both parties.

Upon receipt of this notice, the CEO and CRO should be notified immediately that the FSPO are about to commence their complaint process in respect of a complaint they have received.

From the appointment of a DRO the informal stage of the FSPO Complaints Process can take around ninety days to complete however if settlement cannot be agreed the formal complaint process will commence which can take a further nine to eighteen months to complete. As such, the period prior to the appointment of a DRO is very important with respect to either preparing our position or making a further attempt to resolve the complaint with the complainant outside of the FSPO Complaints Process.

14. General Guidance for Handling Complaints

- On receipt of a Complaint whether by phone, email, letter or in person, the Executive should escalate the complaint to the relevant TL/Manager providing details of the complaint, together with the Complainants contact and policy details.
- TL/Manager on reviewing the complaint should assign a suitably experienced Complaint Handler.
- Complaint Handler should immediately contact the Complainant to get a full understanding of their complaint.
- Complaint Handlers should investigate the issues and endeavour to resolve all complaints to the customers satisfaction within 5 working days.
- Always seek guidance from your TL/Manager if you need their assistance.
- Once the complaint is fully resolved, and the Complainant is happy to close the complaint, send the details of the complaint to compliance@arachasemployeebenefits.ie where it will be recorded in the Complaints Register.
- Where a complaint or an investigation into one affects an employee or those in their line management, a conflict can arise. This creates a risk such as a motive to suppress facts, leading to unfair customer outcomes and a failure to address the issues identified. If you are assigned to handle a complaint and you feel conflicted or you have identified a situation where a colleague in this situation could be conflicted then raise it with your line manager or the Risk and Compliance Team so the necessary steps can be taken.
- Where the complaint is from a client, record clear notes on the client's file regarding the issues raised, the resolution and that the Complainant was happy to close the complaint.

15. Analysis of Trends & Reporting

The status of the Complaint Register will be communicated to the executive management team at least annually. The following Key Risk Indicators are submitted with respect to Complaints:

- a) Monthly Complaints added to the register by division on a rolling 12-month basis.
- b) Total Complaints by status (Closed Under 5 Days, Closed Over 5 Days, FSPO, Open) on the register on a rolling 12-month basis
- c) Number of staff who received Complaint Handling Procedure training year to date.

Compliance will report to the Board, at least annually, on the combined complaint analysis, trends and findings, if they exist, paying particular attention to common trends and issues which require remedial action.

16. Breaches of Procedure

Any breaches of the Complaint Handling Procedure will be reported to the Compliance Department and disciplinary proceedings may be invoked, the potential outcome of which could be up to and including dismissal.

17. Errors & Omissions (E&O)

E&Os include any matter involving an actual or potential breach of professional or regulatory duty which could result in a financial liability to AEB. As a result, they present a material financial risk and carry a significant reputational risk. E&Os may occur at any level of the business.

E&Os usually occur due to incorrect professional advice, hence the regulatory requirement for brokers to have Professional Indemnity (PI) Insurance. An example of an E&O issue would be where a customer changes something on their policy, we do not process it, a claim occurs which is declined, which results in the customer making a complaint.

If a potential for an E&O situation to occur is identified it should be escalated in line with our Errors & Omissions Procedure immediately.

Appendix I – Chapter 12 Consumer Protection Regulations - Complaints Resolution

101. A regulated entity shall take all reasonable steps to resolve any complaint with the consumer making the complaint.

102. When a regulated entity receives an oral complaint, it shall offer the consumer the opportunity to have that complaint handled in accordance with the regulated entity's complaints process.

103. A regulated entity shall permit and facilitate submission of complaints in writing by post and by electronic means.

104. A regulated entity shall implement and maintain systems and controls to effectively track and manage the progress and resolution of complaints.

105. (1) A regulated entity shall implement a procedure for managing and resolving complaints.

(2) A regulated entity shall make the complaints procedure referred to in paragraph (1) available in a prominent place on all of its websites and shall provide a hard copy of the procedure to a consumer, on request, within 5 working days of the request.

(3) The procedure referred to in paragraph (1) need not apply where a complaint has been resolved, to the satisfaction of the consumer making the complaint, within 5 working days of receipt of the complaint, provided however that a log of the complaint shall be kept and maintained as required by Regulation 106.

(4) At a minimum, the procedure referred to in paragraph (1) shall provide for the following:

(a) subject to subparagraph (b), the regulated entity shall acknowledge each complaint on paper or on another durable medium within 5 working days of the complaint being received, and such acknowledgement shall include –

- (i) clear and complete details of the regulated entity's procedure for handling complaints,
- (ii) where a consumer can refer the matter to a relevant ombudsman, information that where the circumstances described in subparagraphs (f) and (g) arise, a consumer can refer the matter to the relevant ombudsman, and
- (iii) the contact details of the relevant ombudsman;

(b) in respect of a complaint submitted online by entering the complaint on a website used by the regulated entity to facilitate the submission of complaints, the regulated entity shall provide an immediate or automatic acknowledgement, on a durable medium, that confirms receipt of the complaint and includes the information referred to in subparagraph (a)(i) to (iii);

(c) the regulated entity shall provide the consumer making the complaint, or the person making the complaint on the consumer's behalf, with a point or points of contact in relation to the complaint until the complaint is resolved or all steps of the regulated entity's complaints handling procedures have been exhausted;

(d) the regulated entity shall provide the consumer making the complaint with a regular update, on paper or on another durable medium, on the progress of the investigation of the complaint at intervals no greater than 20 working days, starting from the date on which the complaint was received;

(e) the regulated entity shall investigate and make reasonable efforts to resolve a complaint within 40 working days of having received the complaint;

(f) where the 40 working day period referred to in subparagraph (e) has elapsed and the complaint is not resolved, the regulated entity shall –

- (i) notify the consumer making the complaint of the anticipated timeframe within which the regulated entity hopes to resolve the complaint,
- (ii) where the consumer has a right to refer the matter to a relevant ombudsman, inform the consumer of their right to refer the matter to the relevant ombudsman, and
- (iii) provide the consumer with the contact details of such ombudsman;

(g) within 5 working days of the completion of the investigation, the regulated entity shall advise the consumer making the complaint on paper or on another durable medium of –

- (i) the decision at the conclusion of the investigation, including the reasons for that decision,
- (ii) where applicable, the terms of any offer or settlement being made to the consumer making the complaint,
- (iii) where the consumer has a right to refer the matter to a relevant ombudsman, the fact that the consumer may refer the matter to the relevant ombudsman, and
- (iv) the contact details of such ombudsman.

(5) Where a regulated entity is providing payment services –

- (a) paragraph (4)(d), paragraph (4)(e) and paragraph (4)(f) do not apply to that regulated entity, and
- (b) paragraph (4)(a)(ii) does not include information on the circumstances described in paragraph (4)(f).

106. (1) A regulated entity shall keep and maintain an up-to-date log of all complaints from consumers.

(2) The log referred to in paragraph (1) shall contain the following:

- (a) details of each complaint, to include the core reason for the complaint in order to facilitate analysis of the complaint by category;
- (b) the date that each complaint was received;
- (c) a summary of the regulated entity's response including the date of such response to the consumer who made the complaint;
- (d) details of any other relevant correspondence or records;
- (e) the steps taken to resolve each complaint;
- (f) the date the complaint was fully resolved;
- (g) where relevant, the current status of a complaint which has been referred to the relevant ombudsman and the current status of an appeal of a decision from the relevant ombudsman.

107. (1) A regulated entity shall implement robust governance arrangements for the appropriate handling of complaints from consumers.

(2) The arrangements referred to in paragraph (1) shall include –

- (a) processes for the proper oversight of complaints handling,
- (b) analysis on a regular basis and, in that regard, at least once every 6 months, of the rate of occurrence and patterns of complaints, which shall include complaints resolved within 5 working days, and
- (c) arrangements within the regulated entity for reporting to the compliance or risk function of the regulated entity, or any other relevant function of the regulated entity as required, as well as to the board of directors, or the entity or persons controlling the regulated entity, of aggregated information on the number of complaints handled and resolved, and on the analysis referred to in subparagraph (b).

Thank You



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