

Version V2
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Complaints Management Policy

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1 Content of the Policy

Objective :

The general objective of this procedure is to achieve faster and better quality processing of complaints respecting the rules laid down by the supervisory authority.

Laws and regulations :

- EIOPA guidelines
- Charte de l'ACA,
- CAA circular 14/1 «gestion des réclamations dans les compagnies d'assurances »
- CAA regulation n°19/03 " résolution extrajudiciaire des litiges »

Internal regulations :

- The code of conduct of the Baloise Group in Luxembourg
- The general claims management policy (Baloise Assurances Luxembourg S.A and Baloise Vie Luxembourg S.A)

1.1 General guidelines for all employees

Introduction

1. The Baloise Group in Luxembourg attaches great importance to customer service.
2. Our core business is to meet the needs of our customers and satisfy them.
3. Nevertheless, some customers may still have complaints. We should consider these complaints as an opportunity to improve the quality of our services as well as our procedures and products.
4. Customer complaints must be dealt without delay and in accordance with the rules in force.
5. Our slogan should be: "Put yourself in the customer's shoes".
6. Satisfied customers are a guarantee of loyalty and this helps to preserve the good reputation of the Company and of our profession in general.

Definition of a claim

The Circular Letter 14/1 defines a claim as A statement of dissatisfaction addressed to an insurance undertaking by a person relating to the insurance contract our service he/she has been provided with. Complaints handling should be differentiated from claims-handling as well as from simple requests for execution of the contract, information or clarification.

How to Recognize a Claim

Two cases can be encountered: either the recipient can establish with certainty that it is a complaint or he identifies it as such on the basis of a bundle of clues and in this case, several criteria* must be observed (depending on the form, origin, destination, content [...]).

Small summary table of several criteria allow us to determine if we are facing a claim:

	The form	The Origin	The destination	The content (Final attention)
To be determined with Certainty that it is a claim or several criteria are necessary	<p>Written or oral expression :</p> <ul style="list-style-type: none"> - It is literally and explicitly mentioned that it is a claim (certainty). - Words like "I complain about, I am not satisfied with ..." (combination of criteria) - Threats of legal action, contact with a mediator, the CAA or another supervisory authority ... 	<ul style="list-style-type: none"> - the customer, - the beneficiary, - the representative (Lawyer, Mediator...) [...] via the press, social networks, etc. AAC - the intermediary [...] <p>Complaints from suppliers, partners, intermediaries, agents (payment of commissions, invoices, ...) do not fall within the scope.</p>	<ul style="list-style-type: none"> - Company - Management, a higher and unusual hierarchical level 	<ul style="list-style-type: none"> - An explicit apology - Request for compensation - Corrections to a file - Reversal of a final decision - [...]

*Non-exhaustive list

Receipt of a complaint

An objective examination should be carried out when dealing with complaints. This means that the processing of the claim cannot be carried out by the person who is the cause of the claim in order to remain objective and to avoid any risk of conflict of interest.

Baloise in Luxembourg has chosen to deal with customer complaints, whether they are submitted directly or through their intermediary, in consultation with specially trained persons and in accordance with the "four eyes principle".

Reception phase

It is crucial that we pay the necessary attention to the first signal of customer dissatisfaction. From the first reception, our services must try to alleviate this dissatisfaction by using appropriate and detailed words.

The expression of dissatisfaction can be both written (letter, e-mail, fax [...]) and oral (telephone or face-to-face interviews [...]).

The reception of complaints can therefore be done in different ways.

The website or the general terms and conditions tell customers how to submit a complaint via the Company's postal address or by using the reference email address " qualite@baloise.lu " .

Definition of the notion of complaint

The person in charge of the department that received the complaint determines whether we have a complaint within the meaning of this procedure. In order to determine whether we are facing a complaint, the following 3 conditions must be met :

- The identity of the complainant is known.
- Dissatisfaction is expressed.

The plaintiff complains about poor performance of the contract or noncompliance with the law or regulations by Baloise, regardless of whether or not he or she has suffered any damage.

1.2. Guidelines for Handling Complaints by the Appropriate Person

As indicated in Part I, the expression of dissatisfaction can be both written (letter, email, fax [...]) and oral (telephone or face-to-face interview [...]). Although treatment requires different means, it is important to attach equal importance to it, regardless of the channel.

Treatment of a verbal complaint

Listening

It is necessary to give the Customer the opportunity to express his complaint (without letting it become offensive ...).

Understanding

It is necessary to give the feeling that the complaint is being heard (for example, by using words like "yes", "I understand", "I understand", etc.) without agreeing with him!

Gathering Information

In order to ensure an optimal treatment of the claim, it is necessary to obtain from the claimant various information such as his/her Name(s), First Name(s), Customer Number, Contract Number but also to ask the reasons for the call (if not already expressed).

Summarize the complaint

In your own words, summarize his complaint. This will allow the Customer to add information so that you can have all the elements in hand.

Professional secrecy

As a reminder, we are all bound to secrecy regarding confidential information transmitted by our customers. This is why it is necessary to pay particular attention to the information you communicate by telephone given the impossibility of identifying the person online.

During a direct interview

It is necessary to pay attention to the body language (nod, concentration...).

Propose a solution

Whenever possible, a "solution" should be proposed. If not, a likely response time should be indicated to the customer, so that you can discuss it with your manager or pass it on to the relevant department manager.

Closing the discussion

Close the discussion with respect, giving the necessary explanations to the client and not forgetting to thank him/her.

Follow-up on the complaint

Follow-up is an important and significant element and should be done even when the problem is solved.

Handling a written complaint

Receipt of a letter that is supposed to be a complaint

Transmission to the Head of Department of the department concerned

Indeed, if an employee receives a complaint that does not seem to be intended for him/her, it must be addressed to the head of department according to the theme.

For example, if a person works in logistics and receives a letter relating to a claim related to an automobile accident, he or she must forward it to the appropriate department.

Transmission to the manager designated by him.

The head of department designates, among others, the person according to the following criteria

Amount of the damage initially advanced by the customer	Who can process the claim
None or less than 10.000 euros	An employee of the department concerned
10.000 euros to 100.000 euros	The head of Department
More than 100.000 euros	The Legal Department

Amount of the damage initially advanced by the customer	Who can process the claim ?
None or less than 10.000 euros	An employee of the department concerned
10.000 euros to 100.000 euros	The head of department
More than 100.000 euros	The compliance department

Attention: The person in charge of processing the claim may not under any circumstances be a person specifically implicated by the claimant.

- a) *Acknowledgement of receipt of the claim*
- b) *The person in charge of processing the claim, designated by the service manager, shall acknowledge receipt of the claim within 10 business days according to the rules defined in the Procedure Gestion des Réclamations, Preparation of the reply by the person in charge*
- c) *An analysis of the cause of the claim must be made according to the rules defined in the Procedure "Gestion des Réclamations" before writing on the answer to the client that has to be comprehensible objective, impartial and honest. Mail signed by the person in charge and the head of the department*

It also illustrates the four-eye principle.

d) Sending the response to the claimant

It shall be sent within 30 days following the date of the acknowledgement of receipt, unless the person in charge of the file communicates otherwise to the claimant beforehand. It is always necessary to choose the same means of communication as the client (unless otherwise requested).

There are two possible scenarios:

- Either you answer favorably to the client

In this case, the incident is closed. However, ask the client if you can still be of assistance.

- You cannot respond favorably to the client

In this case, You need to explain why you can't help.

Use neutral language, show compassion without apologizing.

If the claim is unjustified but it is decided to propose a solution for commercial reasons:

- It is still necessary to agree to intervene but without any recognition of responsibility.
- Ask the client if you can still help him.
- A copy of the answer should be sent to the responsible for claims.

Reaction of the customer to our handling of his complaint

This is the phase of negotiation and exchange with the client.

- If the customer is satisfied

The file can be closed (with a copy of the commercial inspector + agent + responsible for claims [...]).

We can contact the customer again afterwards to make sure of his level of satisfaction.

- The customer is not satisfied :

He must be informed that he can contact:

- In the absence of a satisfactory response within ninety (90) days, the Commissariat aux Assurances (a prudential control body, authorized to deal with requests for out-of-court settlement of claims), according to the terms and conditions appearing on the website of the Commissariat aux Assurances (<http://www.caa.lu/fr/consommateurs/resolutionextrajudiciaire-des-litiges>).
- The Insurance Ombudsman in Luxembourg by mail at the address of "I.U.L.C., 55, rue des Bruyères, L-1274 Howald or by the A.C.A., B.P. 448, L-2014 Luxembourg" or one Ombudsman recognized in his country of residence.

Registration, reporting and improvement process

This step is necessary in order to ensure constant follow-up and to obtain instruction in complaint management. We register complaints in a central system kept and followed-up by the Compliance Officer. On regular basis, the Compliance Officer asks to the heads of each departments if the complaints mentioned on the Register are still open or can be closed.

Agreed Director is informed about all introduced complaints. A situation of the handling of complaints is forwarded twice a year to the Executive Committee (COMEX) and to the Governance Director.

The figures obtained from this register enable us to assess the degree of impact on customer relations and thus to analyze the causes, recurrence or level of risk.

Statistical analyses in terms of quality and value are carried out to compare the results at regular intervals and assess the impact of the improvement actions implemented and to be implemented.

We send also an annual report to the CAA.

1.3 Guidelines for handling other complaints.

When claims are made by an intermediary (agent or broker...), a service provider or other third party, the department head must manage the situation according to the internal procedure of his department. In the event of a major concern, or when important amounts and stakes are at stake, the compliance department must be notified.

Again, a summary table (excel file) must be kept by the department in question and sent to the person responsible for complaints at the times defined by the latter.