

Complaint Handling Policy

1 BACKGROUND AND OBJECTIVES

This policy applies to all employees at RiskPoint Group (the “Company”) on a global basis. The purpose of this policy is to outline the proper procedures for how to handle complaints. For the purpose of this policy a complaint is defined as a submission to the Company, or to the person or department responsible for handling complaints, from a third party expressing their dissatisfaction with the service or product provided by the Company.

2 COMPLAINT ENTRY

Complaints from clients, brokers or other third parties can be received at every level within the Company. It is important that all employees follow the Company’s complaint procedure to ensure that every complaint is handled appropriately.

When a complaint is received, an acknowledgment of receipt shall be sent to the complainant promptly, and the complaint must be logged in the Complaint Log.

3 AUTHORITY TO HANDLE COMPLAINTS

As an insurance intermediary, the Company’s complaints handling processes are specified in the Binding Authority Agreement with the applicable carrier. It is a core part of this policy that those processes are adhered to.

In addition, complaints handling processes are influenced by local legislation. Having a worldwide presence, the Company is required to follow local requirements for complaints, for example with regards to definitions, timescales and procedures. Information tools such as Lloyd’s Crystal and Axco are to be consulted when handling complaints, especially where the Lloyd’s two stage complaints handling process must be followed. Where Lloyd’s capacity is relevant, the Lloyd’s Complaints Handling page must be consulted: <https://www.lloyds.com/complaintshandling>.

4 REFERRAL

Every RiskPoint Group employee should handle complaints the best way they can, without violating any legal requirement or internal rules and guidelines. If the employee does not feel that the complaint can be handled immediately and in an appropriate way, they should escalate without delay. Escalation should be made to the Country Manager or the CEO as appropriate.

Whether a complaint is solved immediately or referred, the Director of Finance & Operations and the Operations Manager must be notified, and the complaint logged.

If a complaint is regarding or in relation to a carrier, the carrier shall be notified promptly of the complaint. It is the responsibility of Director of Finance & Operations to notify the carrier, and employees must notify the Director of Finance & Operations of any such carrier complaint.

Carrier, Lloyd’s and/or local authorities should be notified promptly if the complaint is likely to adversely affect the reputation of the carrier or Lloyd’s may affect any legal or regulatory authorisations of Lloyd’s or any authorisations which the carrier rely on to conduct insurance business may result in legal or regulatory proceedings or action being commenced against the carrier or Lloyd’s

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