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| **LOCKton NORWAY AS**  |
| Procedure for Complaint Handling |

# Purpose and Scope

The purpose of this procedure is to ensure equal treatment of complaints in Lockton Norway AS and to ensure that complaints are dealt with thoroughly, correctly and fairly in line with legal requirements and the company's philosophy.

# Legal and Regulatory Requirements

The legal and regulatory requirements for complaint handling are set out in:

* The Insurance Distribution Act Section 9-2 «Insurance distribution companies must have routines to ensure that complaints from customers or other affected parties are handled in a proper manner.» [lovdata.no/forsikringsformidlingsloven](https://lovdata.no/forsikringsformidlingsloven) (Norwegian only)
* Circular 4/2019 from The Financial Supervisory Authority of Norway (Finanstilsynet) Guidelines for handling complaints in banking, finance, insurance and securities business [finanstilsynet.no/rundskriv/2019/retningslinjer-for-klagebehandling](https://www.finanstilsynet.no/nyhetsarkiv/rundskriv/2019/retningslinjer-for-klagebehandling-i-bank--finans--forsikrings--og-verdipapirverksemd/#I%C2%A0Retningslinjene%20gjeld%20for%20desse%20verksemdene) (Norwegian only)
* EIOPA Guidelines on complaints handling by insurance intermediaries

[Guidelines on complaints-handling by insurance intermediaries](https://www.eiopa.europa.eu/sites/default/files/publications/eiopa_guidelines/gls_complaints_handling_iintermediaries_original_en.pdf)

Relevant internal policies and procedures:

* Lockton’s Error & Omissions Avoidance Guidelines.

# Complaint Handling

## Receipt of Complaint

The company has set up an e-mail address complaints.no@lockton.com which customers and other affected parties can send complaints to. This e-mail address also appears in the company's service agreement (marine: business principles) which is sent to all customers. The Chief Compliance Officer and Chief Executive Officer (CEO) have access to this.

If an employee receives a complaint to their personal e-mail address, the Chief Compliance Officer and CEO must be informed as soon as possible.

## Assessment of Complaint

The Chief Compliance Officer shall, as soon as possible after receiving a complaint, initiate a meeting with the person/those responsible for the matter to which the complaint relates and the CEO. In advance of the meeting, the responsible insurance intermediary must collect all relevant information and evidence (including correspondence) to ensure a comprehensive assessment of the complaint.

In the meeting, the following points must be considered:

1. The content of the complaint and the customer's possible claims, including possible financial and/or other consequences for the customer, financial and/or reputational consequences for Lockton Norway.
2. If there is a need for immediate measures, including notification in accordance with Lockton's Error & Omissions Avoidance Guidelines.
3. Is Lockton Norway the right recipient of the complaint? If this is not the case, the responsible insurance intermediary must, as soon as possible after the meeting, inform the customer of this and as far as possible, guide them as to who the correct recipient is.
4. Are there potential conflicts of interest?
5. Whether there is a need for external reporting or reporting to the board.
6. Is there a need to obtain further evidence and information regarding the complaint?
7. How can the error to which the complaint relates be rectified?
8. If no error has been identified, is there a need to provide guidance to the customer?
9. Is there a need to inform external parties, e.g. the insurance company?
10. Will we be able to give the customer a final response within 15 working days, or is there a need for a temporary response? See section 3.4 (Deadlines).
11. If we do not manage the 15-day deadline, how long do we expect the complaint processing to take? See section 3.4 (Deadlines).
12. Who will write the response to the customer?

If there is a need for further meetings, the Chief Compliance Officer will follow this up.

Decisions that do not fully support the complainant must be justified in writing, include any guidance to the complainant and provide information about the possibility of bringing the case before the Complaints Board for Insurance and Reinsurance Brokerage Business (Norwegian: Klagenemnda for forsikrings- og gjenforsikringsmeglingsvirksomhet).

## Communication

All communication about the complaint must be in writing (e-mail is permitted) and in clear and unambiguous language, with as little use of business jargon as possible. Verbal discussions with the customer must be followed up with a written note that is shared with the customer by e-mail.

## Filing of Documentation

All documentation, including important correspondence with the customer, must be stored in the customer folder in the company drive. The documentation is our most important defence in the event of a complaint.

All documentation relating to the complaint must be kept for five years after the complaint has been processed.

## Deadlines

The customer must receive a final response to the complaint without unnecessary delay and as a main rule within 15 working days.

Where it is not possible to give a final answer to the complaint within 15 days, we must give the customer a temporary response as soon as possible, in which we inform about the reason for the delay and when the matter is expected to be fully dealt with.

# Registration and Reporting

Upon request, Lockton Norway must be able to provide The Financial Supervisory Authority of Norway (Norwegian: Finanstilsynet) with information on the number of complaints and complaint handling.

The Chief Compliance Officer shall ensure that at least the following information about the individual complaint is registered in Lockton's complaint handling register:

1. Reason for complaint
2. The complainant's identity
3. Date of receipt of complaint and date of completion of handling
4. Type of insurance
5. Result/decision

# Analysis of Complaints

The Chief Compliance Officer shall continuously analyse the information received in the complaints to assess whether the cause of the complaints relates to systematic or fundamental problems at Lockton Norway.

The assessments shall be included in the quarterly report to the Executive Management Committee and the board. The Executive Management Committee shall, before the report is presented to the board, provide input and assess whether identified root causes may also affect other processes or products, including those not directly complained about, and assess the need for corrective measures where it is reasonable to do so.

# Information to Customers

Lockton Norway’s service agreement (*marine: business principles*) contains information for customers about the company's complaint handling. That information, together with this routine, shall be reviewed at least annually and in the event of any changes in legal or regulatory requirements.