

Procedure for Complaint Handling

1. Purpose and Scope

The purpose of this procedure is to ensure equal treatment of complaints in Lockton Sweden AB and to ensure that complaints are handled thoroughly, correctly, and fairly in line with legal requirements and Lockton's philosophies.

2. Legal and Regulatory Requirements

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

- The Insurance Distribution Act Chapter 4, Section 15 (*Swedish: Lag (2018:1219) om försäkringsdistribution*) https://www.riksdagen.se/sv/dokument-lagar/dokument/svensk-forfattningssamling/lag-20181219-om-forsakringsdistribution_sfs-2018-1219 (Swedish only)
- Regulation FFFS 2018: 10 on Insurance Distribution Chapter 10 (*Swedish: Finansinspektionens föreskrifter om försäkringsdistribution*) <https://www.fi.se/contentassets/2e8d4b4ff7124faca86cc1c2f1988c7d/fs1810k-221220.pdf> (Swedish only)
- EIOPA Guidelines on complaints handling by insurance intermediaries [Guidelines on complaints-handling by insurance intermediaries](#)

Relevant internal policies and procedures:

- Lockton's Error & Omissions Avoidance Guidelines.

3. Complaint Handling

3.1 Complaints Officer

The Complaints Officer of Lockton Sweden AB, registered with the Swedish Financial Supervisory Authority's ("SFSA"), is Anita Gerdin, Chief Compliance Officer Nordic Region.

3.2 Receipt of Complaint

The company has set up an e-mail address complaints.se@lockton.com which clients and other affected parties can send complaints to. This e-mail address also appears in the company's service agreement, which is sent to all clients. The Complaints Officer and Chief Operating Officer Nordic Region (COO) have access to the e-mail. All complaints can be submitted at no cost.

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

3.3 Confirmation of Receipt of Complaint

The Complaints Officer shall as soon as possible send the complainant an e-mail confirming receipt of the complaint and advising where the Lockton Complaints Handling Routine is available, with link to web site.

3.4 Assessment of Complaint

The Complaints 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 COO. 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:

- a) The content of the complaint and the client's possible claims, including possible financial and/or other consequences for the client, financial and/or reputational consequences for Lockton Sweden AB.
- b) If there is a need for immediate measures, including notification in accordance with Lockton's Error & Omissions Avoidance Guidelines.
- c) Is Lockton Sweden AB 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 client of this and as far as possible, guide them as to who the correct recipient is.
- d) Are there potential conflicts of interest?
- e) Whether there is a need for external reporting or reporting to the board.
- f) Have all relevant facts in the matter been clarified, or is there a need to obtain further evidence and information regarding the complaint?
- g) How can the error to which the complaint relates be rectified?
- h) If no error has been identified, is there a need to provide guidance to the client?
- i) Is there a need to inform external parties, e.g. the insurance company?
- j) Will we be able to give the client a final response within 14 working days of receipt of the complaint, or is there a need for a temporary response? See section 3.4 (Deadlines).
- k) If we do not manage the 14-day deadline, how long do we expect the complaint processing to take? See section 3.4 (Deadlines).

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

The Complaints Officer will send the temporary response, if required, and the final response to the complainant. Responses to complaints shall be objective and correct.

Decisions, that do not fully support the complainant must be justified in writing and include:

- guidance to the complainant on Lockton's view of the complaint; and
- information on the possibility for the complainant of bringing the matter to a general court.

3.5 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 client must be followed up with a written note that is shared with the client by e-mail.

3.6 Filing of Documentation

All documentation, including important correspondence with the client, must be stored in the client 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.

3.7 Deadlines

The client must receive a final response to the complaint without unnecessary delay and as a main rule within 14 working days of receipt of the complaint.

Where it is not possible to give a final answer to the complaint within 14 working days of receipt of the complaint, we must give the client 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.

4. Registration and Reporting

Upon request, Lockton Sweden AB must be able to provide the SFSA with information on the number of complaints and complaint handling.

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

- a) Reason for complaint
- b) The complainant's identity
- c) Date of receipt of complaint and date of completion of handling
- d) Type of insurance
- e) Result/decision

5. Analysis of Complaints

The Complaints 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 Sweden AB.

The assessments shall be included in the quarterly report to the Board. The COO 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.

6. Information to Clients

Lockton Sweden AB's service agreement contains information for clients 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.