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Emirates Insurance

COMPLAINT'S HANDLING POLICY

Our Commitment

Emirates Insurance Company is committed to providing a high standard of client service and to maintaining our reputation for honesty and integrity. We believe that complaint resolution is important, and it is incumbent upon us to respond to complaints promptly, accurately, and with the utmost courtesy. We will provide our stakeholders with accessible means with which to communicate their complaint and will employ our best efforts to respond and resolve where possible. All complaints and personal information collected will be handled in a timely, professional, and confidential manner.

Purpose

The purpose of this policy is to provide any stakeholder in Emirates Insurance Company with a clear policy on how to lodge a complaint with the company and what to expect from the company once the complaint has been lodged.

The purpose of this Policy is further to:

- Recognise, promote and protect stakeholders' rights, including the right to comment and complain.
- Provide an efficient, fair and accessible mechanism for resolving stakeholder complaints.
- Provide information to stakeholders on the company's handling process.
- Monitor complaints in an Endeavour to improve the quality of products and services.
- Increase the level of customer satisfaction with the delivery of services.

Definitions

Claimant means a person who has a claim with the Company.

Complaint means a genuine expression of dissatisfaction or concern regarding the company's services, or the complaints handling process itself, made to the company by, or on behalf of:

- a customer;
- a broker;
- Third Party claimant;
- a group or member of the public;
- the regulator or any government department.

Complaint does mean:

- An unreasonable long delay for the company or representative to deal with an official enquiry, processing a policy, delay in settlement of a claim, or settling an amount different to what is expected from the policyholder;
- An complaint about the behavior or conduct of an employee;
- A dispute regarding the assessment of liability (i.e. fault) with respect to a claim;
- A dispute regarding the settlement offer on a claim;

Complainant means the person or organisation making the complaint.

Dispute means a customer's formal disagreement leading to some type of internal or external review or determination.

Organisation means a company, firm, enterprise or association, or part thereof, whether incorporated or not, public or private, that has its own function(s) and administration.

Commitment

We are committed to efficient and effective complaints management. Our commitment involves:

- all levels of the Company, particularly the organisation's Executive Committee;
- encouraging an organizational culture that welcomes complaints as an opportunity to improve services;
- the adoption and dissemination of this policy – 'Complaints Handling Policy'; and
- reporting information about complaints management in our Annual Report, including the number of complaints received, the amount of time taken to resolve the complaints, and service improvements made as a result of the complaints received.

Fairness

We recognise the need to be fair to both the complainant and the Company or employee against whom the complaint is made.

If a stakeholder complains, we will:

- treat the complainant with discretion, courtesy and fairness at all times;
- maintain appropriate confidentiality of the complaint at all times;
- not victimize or harass the complainant as a result of any complaint he/she makes against us;
- not discriminate against the complainant because of any disability, his/her colour, race, religion, age or sex.

We will provide a response to the complainant and inform the complainant of our decision and the reasons for that decision.

Complaints about employees

If you have a complaint about one of our employees, please lodge your complaint against 'person' on the Complaint Form if you are completing it online. If you are lodging your complaint in another way (e.g. phonecall, letter, fax) please address it to or ask to speak to the Human Resources Department. If you do not know the employee's full name, please provide their first name, department and mobile number if you know it.

All complaints about employees are referred on to the relevant Manager. Where and when appropriate, the employee will be:

- given the opportunity to comment;
- informed of the final resolution/decision and the reason for that decision;
- and provided with a copy of the final reply to the complainant.

If the relevant Manager deems it appropriate, the employee will receive appropriate training and/or counselling.

Access to the complaints process

A person wishing to make a complaint may do so in person, by telephone, by letter, by fax, by e-mail or via our website.

All complaints made with us will be lodged via a 'Complaint Form', and recorded on to our Complaints System.

A complaint may be made to the Compliance Officer in person, by phone, fax, email, in writing or via the Company's Internet. Verbal complaints will be documented immediately by the employee who receives the complaint.

A person may lodge a complaint by filling out and completing a 'Complaint Form' the Company's website. For complaints made in person or by telephone, letter, fax, or e-mail, one of our staff members will complete a Complaint Form on behalf of the complainant and attach any associated correspondence that has been received (e.g letter, fax, email).

Where a complaint is made in person at the Company, we will respect that the customer may wish to make the complaint in a private area where he/she may feel more comfortable.

Complaints are best made to the member of staff with whom the customer has been dealing. They can, however, be directed to the Compliance Officer. Approaching independent external sources for assistance is another option available.

Responding to complaints

If a customer complains, we will:

- attempt to resolve the complaint at the first point of contact, where possible;
- acknowledge receipt of the complaint no later than one working day;
- where a complaint is not fully understood, telephone the person who lodged the complaint to ensure we understand the issues correctly; and
- for complaints not resolved "on the spot", aim to resolve the complaint and issue a response within 3 working days.

If these time frames cannot be met, we will tell the complainant why and give some idea of when we will reply in full.

We may, at any time after receiving a complaint, decide not to deal with the complaint, or to stop dealing with the complaint, because:

- it does not relate to a matter we have power to deal with;
- it is frivolous, vexatious, misconceived or lacking in substance; or
- having regard to all the circumstances of the case, the enquiries into, or the continuance of the enquiries into the matter raised in the complaint, is unnecessary or not justified.

The Compliance Officer, in consultation with other relevant senior staff, will make decisions of this nature where appropriate. If we decide not to deal with a complaint, or to stop dealing with a complaint, we will inform the complainant of the decision and the reason(s) for the decision.

Complaints System

We have a customised computerised Complaints System for the recording and acknowledgment of complaints, and reporting of complaints. This system enables complaints to be managed at various stages.

- **First stage:** Recording and acknowledgment of the complaint and attempted resolution by front line staff.
- **Second stage:** If the complainant is still not satisfied, a more senior staff member such as a Supervisor or Manager will review the person's complaint and the results of the review will be reported to the complainant.

  If the complainant remains dissatisfied, we will consider other options that may available to achieve a resolution.
- **Third stage:** If the complaint cannot be resolved within the organisation, the complainant will be referred to an outside agency, such as the Insurance Authority.

Remedies

We will endeavor to resolve all complaints received as fairly as possible and in a timely manner. Some of the remedies that we may use to help resolve complaints include:

- **Rectify mistakes**
  Where we have made a mistake, taken too long to follow up a matter, or simply overlooked a matter, we will take immediate action to rectify the mistake or situation as soon as practicable.
- **Root Cause Analysis (CSR)**

  For every complaint received, EIC would undertake a CSR to understand the cause and also the trend of a complaint. This is to identify the problem at the concerned department level and address the same at the root of the compliant at hand.
- **Corrective Action plan / Preventive Action plan (CAR / PAR)**

  Under the standards of ISO 9001:2000, EIC is not only committed to undertake corrective action plan for the complaint at hand but also to take measures to prevent occurrence in future.
- **Employee training and counselling**
  Where a complaint is made about an employee, whether it is about the employee's general manner or about the employee providing wrong information, and after investigation if we consider the complaint is justified, the employee will be provided with training and/or counselling.

- **Referral**
  As outlined in this Complaints Policy, if a complaint cannot be resolved by us, the complainant will be referred to the Insurance Authority.

Collecting and recording information about complaints

Complaint data will be recorded using the Complaint Form. Complaint data will be collected, analyzed and reported using our Complaint Register. In addition, all customer complaints are registered on the customer complaints resolution tracker (CCRT) to facilitate quick resolution and to use data for staff training purposes with an objective of preventing such occurrences in future. All complaints will be signed of by the CEO and the complaint data, enquiry outcomes and service improvements will be reported regularly to our Executive Committee. A summary of the Complaints registered during the year will be included in the companies annual Corporate Governance Report.

Storage of complaint records

Records of all complaints will be retained in our Complaints System, both for reasons for confidentiality and for monitoring and evaluation purposes. For example, complaints received from claimants will not be kept on Claims File, instead they will be retained in the Complaints System. Access to the complaints records will be restricted to authorized staff.

Enquiries

Please direct enquiries about the Complaints Policy to:
The Compliance Officer
Emirates Insurance Company
P.O.Box 3856
Abu Dhabi

Tel No: +97126440400
Fax No: +97126450388

Review

The Complaints Policy will be reviewed at regular intervals to ensure it meets the needs of the Company and its customers.

Approved by

Jason Light
Chief Executive Officer