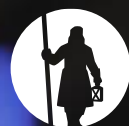


Policy for complaints handling in the companies and by the Customer Ombudsman

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Gjensidige



Content

Policy for complaints handling in the companies and by the Customer Ombudsman	3
1. Purpose	3
2. Scope	3
3. Definitions	3
4. Roles and responsibilities	3
5. Requirements and methods	4
6. Reporting	5
7. Control	6



Policy for complaints handling in the companies and by the Customer Ombudsman

1. Purpose

The purpose of this policy is to contribute to ensuring a consistent, qualitatively sound, fair and customer-oriented complaints procedure in Gjensidige Forsikring ASA and Subsidiaries (Gjensidige).

2. Scope

This policy applies to formal complaints, as defined in 3.2, and shall be used as the basis for the preparation of procedures and standards related to complaint handling.

The requirements for complaints handling by the Customer Ombudsman and requirements for complaints via an external complaints body (section 5.19 to 5.32) is not applicable for ADB Gjensidige.

3. Definitions

3.1 Complaint

A complaint is any expression of dissatisfaction from a customer or other persons, relating to the Group's customer service, services or products, claims handling or the result of these.

3.2 Formal complaint

A formal complaint is an inquiry from a customer or other person, which expresses disagreement with the insurance agreement, the case handling or its results and therefore require the matter to be handled as a complaint.

3.3 Complainant

A complainant is a person who is, according to an agreement, entitled to receive Gjensidige's products, as well as others who may wish to express their dissatisfaction with Gjensidige's case handling or its results.

3.4 Complaints Manager

The person in the company who is appointed to ensure that handling of complaints is carried out in accordance to this policy.

4. Roles and responsibilities

Customer Ombudsman

The Customer Ombudsman is an independent complaint handling function that shall ensure that complaints are handled fairly and that conflicts of interests are avoided.

The Customer Ombudsman shall contribute to sharing knowledge and learning throughout the organisation. This is amongst other things achieved through extensive contact with the sales distribution, settlement teams as well as the product teams. Feedback from the complainants shall be communicated to the organisation.

The Customer Ombudsman shall update their cases in the complaints register.

Complaints Manager

All companies shall appoint a person responsible for the complaints handling. The scope and responsibility of the position shall be adapted to the individual company dependant on the scope of complaints. The Complaints Manager shall ensure that the complaints handling is arranged according to this policy and follows the requirements set out herein. The Complaints Manager shall take the customers perspective and put themselves in the complainant's place, and each complaint shall provide learning and improvement in the organisation. The Complaints Manager shall ensure that the experience is communicated to the relevant units within his/her area of responsibility.

The Head of Customer Ombudsman

The Head of Customer Ombudsman is obliged to notify relevant second- and third-line functions of any matters relevant to the performance of their tasks. This includes that deviations from the provisions of this document shall be reported in accordance with Instructions for registration and reporting of operational incidents. Second- and third-line functions have the right to receive the information and the accesses they request in order to perform their work tasks.



5. Requirements and methods

General

- 5.1 Gjensidige's customers and other persons shall have the right and opportunity to complain.
- 5.2 The access to complain shall be simple and information about the complaint procedure shall be clear, informative and easily accessible.
- 5.3 The complaints shall preferably be made in writing via the online, e-mail or postal complaints form. There shall be no formal requirements as to the form or content of the complaint. The Customer Ombudsman shall assist in submitting an oral complaint in writing or otherwise assist the complainant.
- 5.4 The handling of a complaint shall be free of charge for the complainant.
- 5.5 The complainant shall receive an immediate confirmation that the complaint has been received and a brief outline of the further procedure.
- 5.6 Communication with the complainant shall be accurate, factual and informative and, to the greatest extent possible, formulated individually. As a rule, communication with the customer shall take place via telephone, in order to reveal and manage expectations and to provide the customer with an opportunity to present his/her arguments.
- 5.7 The complaint shall be subjected to an independent review in the complaints process, and it shall be given an objective and fair treatment. The Group's Ethical rules, including the rules on impartiality, also apply to the handling of complaints.
- 5.8 Complaints shall be handled promptly and within defined time limits.
- 5.9 The complaint shall be registered so that it can form the basis for the selection of statistics for the analysis of complaints handling in the Group. The Customer Ombudsman shall assist the companies extracting data from the register. The registration shall be suitable to collect data which will determine trends and potential for improvement, as well as allow measurement of processing time and customer satisfaction index (CSAT).

Rules for complaints handling in the companies

- 5.10 The customer advisor shall register complaints in a suitable electronic tool.
- 5.11 A customer advisor must prioritise a request from a dissatisfied customer. Telephone inquiries must be answered promptly. If the customer advisor is unavailable, the customer shall be asked to leave their contact number and the customer advisor shall return the call within 24 hours. In the case of written inquiries, the customer shall be called immediately, and within 24 hours.
- 5.12 The customer advisor shall take responsibility for and attempt to resolve the case, and if necessary, seek assistance from a manager or another resource that can provide expertise in the matter.
- 5.13 The customer advisor shall act professionally, show empathy, listen to the customer and show willingness to understand and put themselves in the place of the customer.
- 5.14 The customer advisor shall present the cases that are not immediately resolved in the interest of the customer to the Complaints Manager for quality assurance.
- 5.15 The customer advisor shall collect all necessary information and ensure that the case progresses.
- 5.16 The customer advisor shall resolve the matter and notify the complainant of its outcome within three working days. If collection of additional information results in delays, the complainant shall be kept informed of its progress. The deadline for the Complaints Manager's processing of the complaint is 10 working days from the day complete information has been collected.
- 5.17 The customer advisor shall ensure that the complainants are experiencing that they have received an answer to their request. If the complainant continues to be dissatisfied, the complainant shall be informed of their right to complain to the Customer Ombudsman.
- 5.18 The Complaints Manager shall process the complaint to the Customer Ombudsman and will provide a written recommendation to the Customer Ombudsman as soon as possible and no later than within one week.



Rules for complaints handling with the Customer Ombudsman

5.19 The Customer Ombudsman shall register the complaint in a separate complaint register.

5.20 The Customer Ombudsman shall immediately and within 2 working days confirm that the complaint has been received and registered with the Customer Ombudsman in writing and provide the complainant with information about the further process for handling the complaint. As a main rule, the Customer Ombudsman shall follow up through contacting the complainant by telephone, to inform the complainant about the further process for handling the complaint and which person at the Customer Ombudsman is responsible for processing the complaint.

5.21 As the complaint is registered, the Complaints Manager in the company shall be notified about the complaint in writing.

5.22 The Customer Ombudsman contacts the Complaints Manager in writing or by telephone to specify progress and issues related to the complaint.

5.23 The Customer Ombudsman evaluates the complaint and the recommendation and concludes. Consensus shall be sought. If it consensus with the Complaints Manager is not obtained, the Customer Ombudsman has the final authority to make the decision. Prior to reaching a decision, the Customer Ombudsman shall present the matter to a high level of management within the relevant unit at the respective company. If appropriate, the matter should be presented to group legal for an assessment.

5.24 If the complaint is not fully satisfying the complainants demand, the complainant shall be informed of their options for taking their complaint forward.

5.25 The time limit for the Customer Ombudsman's handling of the complaint shall normally not exceed 2 weeks and maximum 4 weeks. If it is necessary to collect further information externally, the deadline can only exceptionally be extended. In such cases, the complainant must be kept informed.

5.26 A complaint to the Customer Ombudsman shall interrupt the deadline to take legal proceedings or to file a case with an external complaints body.

Rules for complaints through an external complaints body

5.27 The Complaints Manager shall handle the complaints that are received through an external complaints body. The Complaints Manager shall register the complaint in the complaint register. Requests shall be responded to as promptly as possible and latest within the deadline set by the external complaints body.

5.28 The Customer Ombudsman shall review the statements in cases that will be handled in external tribunals and provide input to the Complaints Manager for the relevant unit if deemed necessary. The Complaints Manager shall notify the Customer Ombudsman when a statement from the external complaints body is received in the specific case.

5.29 The Complaints Manager shall promptly assess whether to adhere to the decision and communicate their position to the external complaints body.

5.30 The Complaints Manager shall archive all documentation related to the complaint in the register, as well as log the outcome of the complaint when the case is completed.

5.31 Companies that do not adhere to decisions from the external complaints body or decisions from other public complaint bodies shall assume the complainants reasonable and necessary expenses in connection with further judicial procedures.

5.32 Decisions in external complaints bodies that the company does not adhere to shall be processed according to specific procedures. It is referred to Industry norm – compliance with decisions from the tribunals at the Norwegian Financial services complaints board. This requirement is only applicable for Norway.

6. Reporting

6.1 The Complaints Manager shall quarterly and annually measure and report the number of complaints, the percentage of complaints that have been adhered to, the time used to process the complaints, as well as customer satisfaction measurements to the management of the company. Annual reports and annual customer satisfaction measurements shall be sent to the Group Customer Ombudsman.

6.2 The Customer Ombudsman shall provide annual reports for the Group to the Group management team.



6.3 The Customer Ombudsman shall ensure that the company reports to the Financial Supervisory Authorities annually, as set out in circular 4/2019.

6.4 If the customer advisor, the Complaints Manager or the Customer Ombudsman detects a personal data breach, this shall be reported to the line manager for the area relevant for the complaint. The manager shall immediately register the personal data breach in the central incident register and mark it as a "data privacy breach" in the registration form.

7. Control

Head of Customer Ombudsman shall conduct annual reviews in order to secure compliance with the requirements of this policy.

