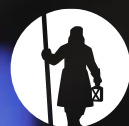


Policy for complaints handling in the first-line and by the Gjensidige's Complaints board

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Gjensidige



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Policy for complaints handling in the first-line and by the Gjensidige's Complaints board

1. Purpose

The purpose of this policy is to ensure a proper, qualitatively sound, uniform and customer-oriented complaints procedure in Gjensidige Forsikring ASA and Subsidiaries (Gjensidige).

2. Scope

This policy applies to Gjensidige Forsikring ASA and its subsidiaries.

3. Definitions

Complaint

A statement of dissatisfaction addressed to Gjensidige from a customer or other persons, relating to their insurance contract, services or products, case handling or its result.

Complainant

A complainant is anyone who has a right to the delivery of Gjensidige's products according to an agreement, as well as others, who has expressed their disagreement with Gjensidige's case handling or its result.

Complaints Manager

The person in the first-line who is appointed as responsible for ensuring that handling of complaints is carried out in accordance to this policy.

Gjensidige's Complaints Board

Gjensidige's Complaints Board (the "Complaints Board") is an independent second line complaints handling function..

4. Roles and responsibilities

Complaints Manager

A responsible person shall be appointed for complaint handling in the first-line. The scope and responsibility of the position shall be adapted to the relevant area depending on amongst other things the volume of complaints. The Complaints Manager shall ensure that complaint handling is organised in accordance with this policy. The Complaints Manager shall adopt the customer perspective and put themselves in the complainant's place. The Complaints manager shall ensure that experiences gained from complaints are communicated to relevant units in their area to facilitate learning and improvement.

Gjensidige's Complaints Board

The Gjensidige's Complaints Board shall ensure that complaints are handled fairly and that conflicts of interest are avoided. The Complaints Board shall contribute to competence-sharing and learning and provide advice on measures to correct root causes. This is done, among other things, through contact with distribution in sales and claims handling, as well as with product teams. Feedback from complainants shall be forwarded to the relevant business area.

The Complaints Board shall register its cases in the complaints database.

5. Requirements and methods

5.1 General requirements

Access to complaints should be simple, and information about the complaint scheme must be clear, informative and easily accessible. Complaints must be processed quickly and within defined deadlines. Complaint handling shall be free of charge for the complainant.

Complaints should preferably be submitted in writing via an online form or by post. No formal requirements shall be imposed regarding the form or content of the complaint. If the complainant wishes, the Complaints Board shall assist in preparing a written version of an oral complaint, or in some other way assist the complainant. Complainants shall receive immediate confirmation that the complaint has been received and a brief explanation about the further process.

Communication with the complainant shall be correct, factual and informative, and to the greatest possible extent individually tailored. The complaint shall be subject to a genuine, new assessment in the complaint process and must be handled objectively and fairly.

All complaints shall be registered in a database as a basis for analysis to identify trends and improvement opportunities and to measure processing time and customer satisfaction. The Complaints Board shall assist business areas in retrieving data.

Rules for complaints handling in the first-line

Customer advisors shall:

- register complaints in a suitable electronic tool.
- obtain all necessary information, ensure progress in the case and, if needed, seek assistance from a manager or another subject-matter expert.
- act professionally and with empathy, listen to the customer and demonstrate willingness to understand and take the customer's perspective.



Cases that cannot be immediately resolved in favour of the customer shall be presented to the Complaints Manager for quality assurance.

Customer advisors shall always prioritise inquiries from dissatisfied customers and respond as quickly as possible. The customer advisor shall provide feedback with a conclusion in the case within 15 working days. If the case cannot be resolved within the deadline, the complainant must be informed and kept updated on the progress in the case.

If the complainant is not fully upheld, a written explanation must be given, including information about the right to escalate the complaint to the Complaints board and external complaints bodies.

If the complainant escalates the matter to the Complaints board, the Complaints Manager shall process the complaint and submit a draft decision letter as soon as possible and no later than within one week. The Complaints Manager shall have sufficient competence within their field of expertise. Sources and other information must be quality-assured, and the letter must be written in a customer-friendly manner. If there are questions from the Complaints board these must be answered as quickly as possible and no later than within three days.

The responsibilities of the Complaints Manager remain the same when using tools with Artificial Intelligence (AI). AI may be used as support in gathering information and drafting letters, but it should not replace professional judgement. All information, assessments and sources proposed by AI must be quality assured by the Complaints Manager, including checking against relevant regulations, internal guidelines and the factual information of the case. AI may only be used in areas where the Complaints Manager has sufficient expertise to verify the content. Draft decision letters shall not contain references to irrelevant or unverifiable sources.

5.3 Rules for complaint handling in Gjensidige's Complaints board

The Complaints Board shall:

- register the complaint in a dedicated complaints database and notify the Complaints Manager in writing.
- immediately confirm receipt of the complaint and inform the complainant of the process.
- contact the Complaints Manager to clarify progress and issues.
- assess the complaint and recommendation and conclude.

If consensus with the Complaints Manager is not achieved, the Complaints Board has the authority to make the final decision and the case shall be presented to a high-level manager in the affected area before a decision is made. Where relevant, the Group Legal department shall be consulted.

If the complaint is not upheld, the complainant must be informed of further options.

The normal processing time in the Complaints Board shall be 2–4 weeks. If the deadline cannot be met, a preliminary response with explanation and expected response time must be sent to the customer.

A complaint to the Complaints Board interrupts the deadline for legal proceedings or referring the case to an external complaints body.

5.4 Rules for complaints via an external complaints body

The Complaints Manager shall handle complaints received through an external complaints body. The complaints manager shall register the complaint in a suitable electronic tool. Inquiries shall be answered as quickly as possible and no later than the deadline set by the external complaints body. Correspondence between external complaints body and Gjensidige must be archived in e-arkiv.

The Complaints Board shall review statements in cases going before external complaints boards and provide input to the Complaints Manager in the relevant subject area where necessary. The Complaints Manager shall notify the Complaints Board when a statement from the Norwegian Financial Services Complaints Board's (Finansklagenemnda) secretariat is received.

The Complaints Manager shall promptly assess whether to uphold the external decision and communicate the position to the external body.

Companies that do not follow decisions from external complaints bodies or decisions from other public complaint systems shall bear the complaints' reasonable and necessary costs of further court proceedings.

Decisions from external complaints bodies that the company does not accept shall be handled according to a specific routine ("Bransjenorm – etterlevelse av avgjørelser fra klagenemndene ved Finansklagenemnda"). In this case, the Complaints Board shall be informed. This section applies only to Norway.

6. Reporting

The Complaints Manager shall quarterly report the number of complaints, the percentage of complaints that have been adhered to and the time used to process the complaints to the head of Gjensidige's Complaints Board.

The Complaints Board shall provide an annual report for the Group management and reports quarterly through the risk and capital report.

The Complaints Board shall ensure that the company reports annually to the Norwegian Financial Supervisory Authorities, in accordance with circular 4/2019.



The Complaints Board shall notify relevant second- and third-line functions about matters relevant to their responsibilities..

7. Control

Head of the Complaints Board shall annually perform controls to ensure compliance with the requirements of this policy.

