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1. Background

This Complaint Management Policy (*the Policy*) has been prepared in pursuant to the requirements of the internal process of FIN Insurance Company Limited and that of *Market Conduct and Business Practice Guidelines for Insurance Institutions in Nigeria 2015* as prescribed by the National Insurance Commission (NAICOM).

2. What Constitutes a Complaint

An expression of dissatisfaction made to an organization, related to its products, or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected (ISO 10002).

3. Scope

This policy shall apply to the following:

- All external customers
- Vendors, third parties who have entered into a contractual relationship with the Company.

This policy sets out the broad framework by which FIN Insurance will provide assistance regarding customers and/or stakeholders issues. It also gives the opportunity to provide material feedback to the company on matters of concern.

4. Exclusions

- Complaints on matters that are sub-judice.
- Complaints that do not necessarily require a follow up or resolution. E.g. violation of terms and condition of policy

5. Objectives

This policy is designed to ensure that complaints are managed in a fair, impartial, efficient, satisfactory, and timely manner. The benefits of instituting an effective complaint management system are as follows:

- Customer Satisfaction

By adopting the management system, customer loyalty is promoted. Customers are confident of commitment for the resolution & redressal of any of their query or complaints.

- Improved Efficiency

Complaint management ensures a consistent process to handle customers, which enables the identification and eliminating the causes of complaints, as well as improve organization's operations.

- Enhanced Stakeholder Relationship

The Complaint Management System helps to adopt a customer-focused approach to handle analysis and review complaints and encourage personnel to improve their skills & behavior in working with customers.

- Transparent System and Credibility

Provide complainants with an open, effective and easy-to-use complaints process. Effective complaint management system that will help to ensure defined responsibilities and procedures to handle and review complaints are in place.

6. Policy Statement / Commitment

The Board and Management of FIN Insurance are committed to providing professional standards of service which includes the following:

- Provide complainants with easy access to our complaint resolution process through the complaint forms submitted at our branches, postal address, telephone and/or e-mail.
- Ensure that the internal complaint process is transparent and visible, so that complainants have full knowledge of what procedures to follow, in order for their complaints to be resolved.
- Make available adequately trained staff that possess the necessary skills and expertise to handle complaints effectively;
- Establish a mechanism for the escalation of complaints up to Senior Management. These complaints will be monitored by the Customer Service Unit.
- Conduct complaints handling training.
- Keep record of each complaint received and the measures taken for its resolution.

7. Complainants' Right

Any complainant has the right to:

- Register a dissatisfaction via the available complaint channels
- Be advised of the company's response to the complaint registered, investigated or rationale for decision taken.

8. Lodging a Complaint

- Your complaint must be communicated using hard copy or electronic complaint forms, e-mails and letters. Communication via telephone is also acceptable, provided the complainant is willing to give consent for his/her complaint to be record by available means (ie. voice recording) at the time the company takes record of the complaint

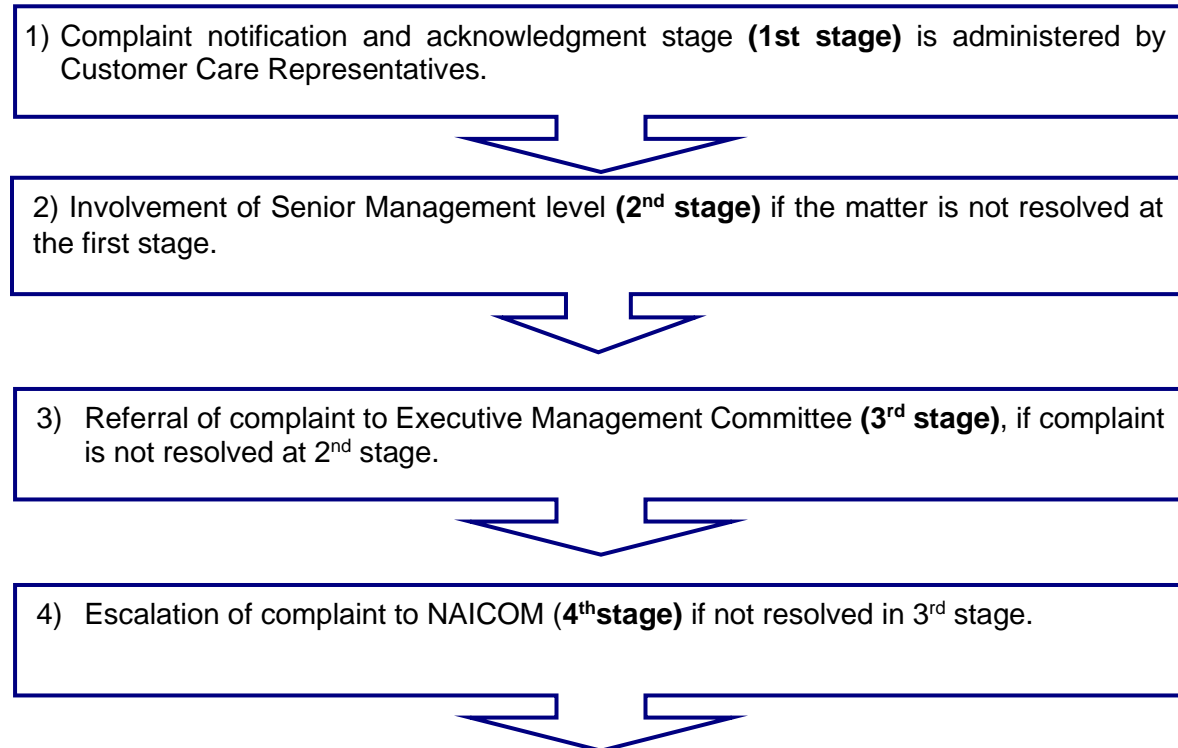
- Complainant shall provide personal details such as full name, address, telephone and/or email address.
- Be specific about the complaint and provide all the important facts (including events) that may have a bearing on the complaint.
- Provide copies of all documents that have relevance to the complaint where applicable (i.e. letters, quotations, previous correspondence etc.).
- Specify a solution / remedial action you believe is required to resolve your complaint.

9a. Complaints Resolution Procedure

Upon receipt of a complaint, the Company shall use its best endeavors to ensure that:

- a.) Details of the complaint or dispute shall be immediately recorded.
- b.) A response shall be provided to the customer within the time frame set out in sub-clauses c-f below.
- c.) Complaints or enquiries received by e-mail or complaint forms shall be acknowledged within two (2) working days of receipt.
- d.) Complaints or enquiries received shall be investigated within two to eight (2-8) weeks of receipt.
- e.) Complaints or enquiries shall be resolved and final response shall be issued within eight (8) weeks of receipt.
- f.) Where a complainant is unsatisfied with the resolution by the Insurer shall within the eight (8) week time frame set out above; the complainant may escalate such concerns to the National Insurance Commission Customer Complaints Bureau through the following media

9.b. Complaint management Process/Work flow



10. FIN Insurance Complaints Channels

FIN Insurance shall utilize the following as complaint management channels

	Channels of Complaints Management	Contact Details
*	Letters	The Customer Service FIN Insurance Company Limited. 34 Gana Street Maitama, Abuja Nigeria.
*	Telephone number	09-2913712
*	Email	complaints@finsurance.com.ng

Live chat represents an online interactive platform on the FIN Insurance website that allows customer service representative interact real time with customers. It also serves as a medium to manage complaints Monday to Friday 9 am- 5pm.

11. NAICOM -Consumer Complaints Bureau

	Channels of Complaints Management	Contact Details
*	Customer Care Telephone lines	09-2919241- 4, 09-2919247, 09-2919249, 09-2919256,09-2919257, 09-2919258, 09-2901511.
*	Complaints Bureau Contact line	08172047735
*	Email address	contact@naicom.gov.ng
*	Electronic complaint form	www.naicom.gov.ng/complains

12. Arbitration Clause

- a. The Customer and Management shall in good faith do all within their power to promptly (by discussions and negotiations between the aggrieved Shareholders and Senior Executives with the authority to settle the dispute or differences) settle amicably any differences or disputes.
- b. An aggrieved Customer shall issue a written notice of the dispute to FIN Insurance and FIN Insurance shall respond within 15 days of receipt of such notice.
- c. Within 30 days of receipt of such notice, both Parties shall meet at a mutually acceptable time and place, and thereafter as often as they reasonably deem necessary, to attempt to resolve the dispute, difference or controversy.
- d. Where the Parties are unable to settle amicably, the dispute shall be referred to Arbitration before a single arbitrator at the Lagos Multi-door Courthouse in accordance with the Arbitration and Conciliation Act, Cap A18 of the Laws of the Federation of Nigeria, 2004. The arbitration proceedings shall be conducted in English Language.
- e. This clause will not preclude any party from applying for or obtaining interim relief on an urgent basis from a court of competent jurisdiction pending a decision of the arbitration court.
- f. A written transcript of the hearing shall be made and furnished to the parties. The cost of this transcript shall be borne equally by both parties.
- g. The arbitrator shall render his award within sixty (60) days of his appointment. Each Party shall bear its own expenses incurred in conducting the arbitration and equally share the fees and costs of the arbitral tribunal save the arbitral award.

- h. Either Party shall not be entitled to suspend the performance of its obligations under the Insurance policy because an arbitral proceeding has been initiated. Provided that the Parties shall always be entitled to approach the courts for urgent injunctive relief in appropriate circumstances.

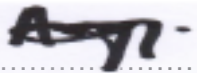
13. Access to this Policy

Customers and other stakeholders shall have access to this policy via the FIN Insurance’s corporate website. www.finsurance.com.ng

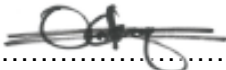
14. Amendment/Review

FIN Insurance may from time to time review the complaint management policy and procedures. Subsequent amendments to this policy shall be incorporated in the FIN Insurance’s corporate website www.finsurance.com.ng

15. Approval



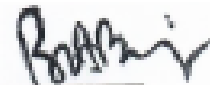
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Head, Customer Service



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Head, Legal and Compliance



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Executive Director, Technical/Operations



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Managing Director/ Chief Executive Officer