

## Complaints procedure

**Version: 002/08122019**

### 1. Context

Since the enactment on 28 December 2018 of the law passed on 6 December 2018 transposing Directive (EU) 2016/97 by the European Parliament and the Council of 20 January 2016 regarding insurance distribution, all insurance distributors are expected to be able to deal professionally with customer complaints.

Each insurance distributor must ensure that each complaint receives a response in any case.

### 2. Procedure

If a customer wishes to file a complaint, the insurance distributor will provide them with the form drawn up for this purpose.

Upon receipt of the completed complaints form, the complaint will be given a registration number. The number will be structured as follows: **year/001**.

After registration, a confirmation letter will be sent to the relevant customer.

#### a. Complaint about an insurance company.

If the complaint concerns an activity, or lack thereof, of an insurance company, Expat & Co will contact the insurance company to discuss the complaint with the relevant departments and those responsible.

If this fails to produce a result, Expat & Co will advise the customer to file a complaint with the insurance company involved. Expat & Co will assist the customer in doing so.

Expat & Co will follow up on such a complaint afterwards. The customer will be kept informed of the course of events.

If this also fails to produce a result, Expat & Co will advise the customer to present the complaint to the insurance ombudsman. Expat & Co will assist the customer in doing so.

Expat & Co will also follow up on complaints brought to the ombudsman. The customer will be kept informed of the course of events.

#### **b. Complaint about Expat & Co.**

If the complaint concerns an activity, or lack thereof, of Expat & Co, Expat & Co will first investigate whether the complaint is well-founded. If it is not, the complaints officer will inform the customer in writing with an explanation.

If the complaint is well-founded, the complaints officer will make every effort to offer an acceptable solution, in cooperation with the insurance companies concerned wherever possible.

Expat & Co may consult external and neutral experts, such as a specialised attorney, notary, accountant, etc., for advice on the admissibility of the complaint.

The complaint will also always be reported to the insurance company.

In such case, Expat & Co will call on its professional liability insurer to intervene.

Expat & Co will keep the customer informed of the course of events in writing.

#### **c. Complaint about an insurance intermediary.**

If the complaint concerns an activity, or lack thereof, of an insurance intermediary, Expat & Co will contact the insurance intermediary to discuss the complaint with the relevant departments and those responsible.

If this fails to produce a result, Expat & Co will advise the customer to file a complaint with the insurance ombudsman. Expat & Co will assist the customer in doing so.

Expat & Co will follow up on such a complaint afterwards. The customer will be kept informed of the course of events.

#### **d. Closing a complaint.**

Once a complaint has been dealt with, Expat & Co will write up a clear report of the course of the complaints procedure. The report will be delivered to the customer and must be signed for receipt and approval.

#### **e. Complaints archival.**

Expat & Co will keep a separate register to log closed complaints chronologically. The complaint file will be stored in a separate file with all complaints.