

COMPLAINTS POLICY & PROCEDURE - BELGIUM

Introduction

We take very seriously any situation that arises where a complaint is made by any client or broker about how we have handled their insurance. Under Belgian regulations we are required to comply with certain compliant handling rules where the complainant is eligible to make a complaint. An eligible complainant is a person eligible to have a complaint considered under the Insurance Ombudsman and is defined as:

“Any natural person who acts for a purpose outside the scope of his trade, company, craft or profession”.

The definition of a complaint is “Any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of, a person about the provision of, or failure to provide, a financial service, which alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience.”

Procedure for those that wish to make a complaint

1. We would wish to resolve the issues as soon as possible so in the first instance (if appropriate) the complainant should discuss their concerns with their normal point of contact. However, if this is not appropriate the complaint should be registered with the Managing Director; this can be in writing, via the telephone or e-mail. Please note that there are no charges associated with processing a complaint. The contact details are as follows:
e-mail: complaintadmin@mithras-europe.eu
Address: Broekstraat/Rue du Marais 49-53, b6 – 1000 Brussels, Belgium
Telephone: +32 2 445 53 20
2. With the exception of complaints that can be resolved by the close of business on the next working day, the Managing Director will acknowledge the complaint promptly, informing the complainant of whom within the company is dealing with the complaint and the timescale in which the complainant can expect to receive a response.
3. The complaint may need to be referred to Lloyd’s Insurance Company (LIC) /the Lloyd’s managing agent subject to the requirements of the wording. In the event that your complaint needs to be referred to LIC please see the attached document.
4. Where at all possible the complaint should be handled by a senior individual not involved with the transaction. In most cases this will be our Compliance Director.
5. The complainant must be kept informed of the progress of the complaint and we must provide a written response in the form of a final letter or holding response (where a final response is not forthcoming) as soon as possible. We are required to provide a final response within 8 weeks of receiving the complaint. If we are unable to do so we need to explain why and also inform the complainant of when a final response is likely.
6. If we have not resolved the complaint within 8 weeks then the complainant is entitled to refer the complaint to the Insurance Ombudsman. We must inform the complainant of the contact details, which are as follows:

Insurance Ombudsman (Ombudsdienst Verzekeringen/Ombudsman des assurances) de Meeussquare 35
1000 Brussels
Belgium
Tel: +32 (2) 547 58 71 Fax: +32 (2) 547 59 75
E-mail: info@ombudsman.as
Website: <http://www.ombudsman.as/nl/service/index.asp?lg=nl&>

7. Once the complaint has been fully investigated in normal circumstances our response will be one of the following options:
 - Accept the complaint and offer compensation if appropriate; or
 - Reject the complaint, giving full reasons for doing so.

Management Information (MI) – All complaints are reported directly to the Managing Director and Compliance Director who are responsible for recording and monitoring all complaints. MI in respect of complaints are reported and reviewed at Board level and reviewed in the context of the business to see whether any changes need to be made to ensure issues do not arise again.

LLOYD'S INSURANCE COMPANY

How to make a complaint?

If you wish to make a complaint, please check your policy for details of the person to contact. Alternatively, contact your broker. If the complaint relates to a claim, contact whoever has been handling your claim to inform them of your dissatisfaction.

If you cannot find the contact details mentioned in your policy, or if you want to complain about your intermediary, you can contact the Lloyd's Insurance Company Complaints team below.

Service Manager
Complaints team
Lloyd's Insurance Company S.A.
Bastion Tower
Marsveldplein 5
1050 Brussels Belgium

Tel: [+32 \(0\)2 227 39 40](tel:+3222273940)

E-mail: lloydsbrussels.complaints@lloyds.com

In order to help us investigate your complaint, please send the below details to: lloydsbrussels.complaints@lloyds.com

- your full name, address and postcode
- your policy reference number
- your phone/email contact details
- full details of what has caused you to make a complaint
- how you would like us to resolve your complaint

You can also appoint someone to act on your behalf; however, we will need written confirmation that they have your permission to do so.

Please note, any professional fees incurred will be your responsibility.

How Lloyd's Brussels will handle your complaint

The Complaints team at Lloyd's Brussels is committed to ensuring that complaints are handled fairly and efficiently. We offer a free of charge complaint resolution service. This service is provided in accordance with the local country-specific regulatory requirements.

What happens next

When you register your complaint, and provide all necessary information, we will first acknowledge its receipt. An acknowledgement of your complaint will be issued within 2 (two) to 5 (five) business days, depending on the country where your risk is located.

We will review your complaint thoroughly and fairly and issue a final response within the required local time frame. This timeframe will be confirmed in the acknowledgement letter.

In case we need any additional information to assess your complaint, we will contact you to request further details. Similarly, if your complaint is particularly complex, and we need more time to investigate, we will write to you within the required local time frame to let you know the status of your complaint.

What happens if you remain dissatisfied with the final response

If you are not satisfied with the final response of your complaint, or you have not received a final response within the timeframe, you may be eligible to refer your complaint to an external dispute resolution organization. This can be a regulator, an ombudsman service or another type of external dispute resolution scheme in your country, which will make an independent review of your complaint. The contact details of the external dispute resolution organization can be obtained from the Complaints team of Lloyd's Insurance Company (see contact details above).

For Belgium, the contact details of the Ombudsman for Insurances are:

E-mail : info@ombudsman.as

Address: Ombudsman van de Verzekeringen, de Meeûsplantsoen 35, 1000 Brussel

Tel: [+32 \(0\)2 547 58 71](tel:+3225475871)

If you have purchased your contract online, you may also make a complaint via the EU's online dispute resolution www.ec.europa.eu/odr.

The complaints handling arrangements above are without prejudice to your legal rights to initiate a legal action.