COMPLAINT HANDLING PROCEDURES

ALICO Bulgaria established rules and procedures that must be observed upon receipt of Complaints FROM costumers of the company or their heirs.

Complaints will be received in written form at the address of the head office of the company: 1404 Sofia, 75 Bulgaria blvd, or via e-mail at: headoffice@alico.bg.

Complaints may be conditioned by a number of matters, including but not limited to: sales and marketing conduct; change in premiums; cancellation of coverage; handling of a claim, servicing the policy and so on.

Complaint Procedure

This procedure that the employees must apply, when complaint correspondence is received, includes the following steps, described below:

- Date and time stamp incoming correspondence;
- Determination of the type of correspondence
- Determine the status of the policy on which the complaint is based:
    - ✓ If the policy is not in force, a respond is prepared accordingly;
    - ✓ If the policy is in force, follow remaining steps;
- Upon receipt of a complaint, a file for the correspondence must be created and a separate identifiable number must be assigned to the complaint by Compliance Department;
- It is necessary to be identified the type and nature of the complaint:
    - ✓ **Policy Owner Service** – these are the complaints relating to the servicing of a policy. This can be during the new business and policy issuance process; the result of changes requested during the life of the policy; the manner in which a premium payment was handled.
    - ✓ **AGENT** – these are the complaints relating to the manner in which Agents treated the policy owner, or some other action related to the Agent.
    - ✓ **PRODUCT** – these are the complaints directly related to the insurance product owned by the compliant. For example these complaints could include interest rates credited or charged; premium or cost of insurance rates, and/or surrender charges applied;

- ✓ **ADVERTISING** – these are the complaints relating to the advertising material used in the sale and purchase of the product.
- ✓ **CLAIM** – these are the complaints relating to benefits under the policy. For the policies that pay benefits while the insured is living /personal accident, disability/ these complaints may come directly from the policy owner or insured. For the policies providing a benefit upon the death of the insured, a compliant is most likely to come from a named beneficiary, or from some other person thinking he/she is a named beneficiary.
- Determine a date by which a response should be sent by Compliance Department. This will vary depending on the complexity of a complaint.
  - ✓ For less complex complaints, the response time should be no longer than 5 /five/ business days;
  - ✓ For more complex complaints, specific time period may not be determined. In this instance, a brief acknowledgement of the complaint should be sent indicating that an investigation is being conducting and a response will be sent as soon as possible. Status should be provided to the complainant at not less than 30 /thirty/ days intervals.
- When a complaint is received from regulatory bodies or authorities it must be recorded in the log and responded to within the time specified in the correspondence. If no time period is specified, resolution of any issue raised must be given the highest priority.
- Copies of complaints must be forwarded to the appropriate department for review, investigation and assistance with drafting a response. Inform the person assigned of the time frame for the response /time frame stated above, less 1 day for review/. The received draft response must be examined and approved by Compliance Department.
- Copies of the responses /draft and final/ must be maintained in the complaint file kept with Compliance Department.
- Complaint log must be updated accordingly, in any case when a complaint has come.

With a view to properly manage the compliant process, a Complaint Log is established and maintained by the Company's Compliance. The procedures outlined above are written in a manner which pertinent information should be recorded into the log. This log should be developed using a method wherein the information can be sorted in different ways. [in paper form]