



# Our approach to Complaints Handling

Based on the Complaints Handling Policy, version 3.0, approved by the Board of Directors on the 14<sup>th</sup> of May 2024, supplemented by the Complaints Handling Standards, version 1.0, approved by the Executive Committee on the 7<sup>th</sup> of May 2024.

## INTRODUCTION

The Complaints Handling Policy is an essential element to ensure a qualitative level of business conduct.

Complaints handling deals with complaints formulated by Complainants.

Ageas has the duty to:

- inform Complainants about the arrangements in place for making Complaints, as well as the process for handling them;
- set up, where appropriate, a dedicated “Complaints” function/body, and an appeal function, without prejudice to the right to take legal action;

Complaints-handling makes part of Ageas overall grievance mechanism, and is to be differentiated from:

- a) Claims-handling;
- b) Simple requests for execution of the contract, information or clarification;
- c) Requests for information and questions by relevant authorities;
- d) Internal Alert System;
- e) Whistleblowing

## SCOPE OF THE POLICY

This Policy applies to ageas SA/NV and all its Subsidiaries, hereinafter referred to as “Ageas”.

Should compliance with this Policy result in non-compliance with local legislation or regulations, the latter must take precedence. Group Compliance must be informed and consulted immediately in such circumstances.

## DEFINITIONS

Complaint<sup>1</sup> means “a statement of dissatisfaction addressed to an undertaking by a person relating to the (re)insurance contract or service he/she has been provided with.”

Complainant means “a person who is presumed to be eligible to have a complaint considered by an ((re)-insurance) undertaking and has already lodged a complaint e.g. (potential) customer, policyholder, insured person, beneficiary and, in some jurisdictions, injured third party, or his/her representative.”

Redress means “putting the complainant back into the position he would have been in, had the error or issue not occurred, including any payment to compensate for inconvenience or distress.”

Staff means “any person working for Ageas, whatever the type of employment relationship is (employed or self-employed) and includes the members of the Board of Directors, Executive Committee, Management Committee, or similar body and the members of the respective local Boards of Directors, consultants, contractors, trainees, seconded staff, volunteers and students.”

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<sup>1</sup> Inspired by definition in: EIOPA-BoS-12/069: Guidelines on Complaints-Handling by Insurance Undertakings.

## GENERAL PRINCIPLES

- I. Ageas sets up an effective complaint's handling process for any eligible person:

Complainants can be assured that a complaint can be submitted:

- via any "direct channel" (e.g., mail, email, phone).  
Social media and press are not considered "direct channels".
- free of charge for the Complainant, its authorized representative or its solicitor.
- With the Complainant's information and personal data treated with due care and in respect of the relevant Personal Data Protection requirements.

- II. All complaints are managed in a prompt, equal, fair, transparent, and efficient way, including redress where appropriate.

Ageas investigates the complaints promptly, independently, and objectively.

Ageas handles complaints within a timeframe in accordance with the local legislation and sectorial code, if applicable.

- III. Eligibility of complaints will be thoroughly assessed.
- IV. Ageas provides adequate training to Staff participating in complaints handling.
- V. Ageas sets up an effective internal follow-up of complaints handling.

In accordance with properly described and documented processes, complaints and complaints-handling data are analyzed on an on-going basis to identify and address any recurring or systemic problems, and potential legal and operational risks.

- VI. Ageas provides external reporting compliant with laws and regulations.

Information on complaints and complaints handling are available for competent authorities, in the format and delays required by them.

## COMPLAINTS MANAGEMENT FUNCTION

A Complaints management function enables complaints to be investigated fairly and possible conflicts of interest to be prevented, identified and mitigated.

The Complaints management function is independent from the claims-handling function, the compliance function and the functions in charge of Incidents Management (whistleblowing cases).

The undertaking should ensure the necessary internal flows and reporting lines for complaints management.

Ageas postulates that the overall responsibility for complaint handling is allocated to a member of the management committee of the company.

## PROVISION OF INFORMATION

1. The company or insurance undertaking publishes details of its complaints-handling process in an easily accessible manner (brochures, pamphlets, contractual documents, website...).



2. It provides clear, accurate and up-to-date information, including details on how to complain (e.g., type of information to be provided, contact details...) and on the process that will be followed (e.g. indicative handling timelines, the availability of a competent authority, an ombudsman...).

De minimis information includes address and e-mail address where to lodge a complaint as well as the full contact data of the national appeal body, if available.

## PROCEDURES FOR RESPONDING TO COMPLAINTS

1. The company or insurance undertaking will always acknowledge receipt of a complaint and provide written information regarding the complaint handling process.
2. Complaints are investigated in a fair way, seeking to gather all relevant evidence and information. Internal deadlines are foreseen and monitored.
3. Communication in regard with the complaint is done in plain language, avoiding technical language, abbreviations.
4. The response is provided without any necessary delay or at least within the time limits set at national level.
5. When an answer cannot be provided within the expected time limits, the company or insurance undertaking should inform the Complainant about the causes of the delay and indicate when the investigation is likely to be completed.
6. The company keeps the Complainant informed about further handling of the complaint. Ageas postulates at least once a month.
7. When providing a final decision that does not fully satisfy the Complainant's demand, the company or insurance undertaking will include a thorough explanation of its stand and set out the Complainant's option to maintain the complaint, e.g., the appeal function, the availability of an ombudsman, an alternative dispute mechanism, national competent authorities, the right to take legal proceedings.

## INTERNAL FOLLOW-UP AND REPORTING

Complaints and complaints-handling data are analyzed on an on-going basis to identify and address any recurring or systemic problems, and potential legal and operational risks.

Regular reporting is made to senior management of the Operational Company and centrally to the CEO. Ageas postulates at least once a year.

Regular information is given to all staff of the insurance undertaking on complaint flow, tendency, and the resulting action. Ageas postulates at least once a year.

If the complaints investigation reveals a systemic process or procedure error, internal audit should be informed; in case of (suspicion of) internal fraud or compliance breaches, the compliance officer, and any other regulatory required body, must be informed at once.

## POLICY GOVERNANCE – ROLES AND RESPONSIBILITIES

The Board of Directors is responsible for defining and supervising the Complaints Handling policy, endorsing its



principles, which is evidenced by their validation of this policy.

The Executive Committee (ExCo) is responsible for implementing this policy, as well as the related documents as herein described.

The Management (Chief Executive Officer, senior management and line management) are responsible and accountable for ensuring that the relevant Staff under their supervision are complying with the policy, in accordance with the supervisory requirements in their locations.

All relevant Staff members are expected to adhere to the policy principles.

The Compliance function monitors the due implementation of this policy and informs the Board of Directors and the Executive Committee of any breach of policy.