COMPLAINTS & FEEDBACK POLICY AND PROCEDURES

OVERVIEW

The Insurance Company of the West Indies (Cayman) Limited ("ICWIC") is a general insurance company that is licensed to carry out insurance business in the Cayman Islands. ICWIC is committed to providing high quality products and service and values the feedback received from our customers. We aim to treat our customers fairly, by listening to their feedback, responding to their concerns in a timely manner and seeking ways within which we can improve our service.

Whilst the term complaint is used primarily throughout the policy, this also relates to feedback received about ICWIC and its operations.

This policy provides guidance for responding to complaints about ICWIC and its agents/brokers and is to be applied to the handling of complaints lodged by clients. It also seeks to ensure the proper management of complaints and facilitate quality management and control. All complaints and personal information collected throughout this process, will be handled in a timely, professional, and confidential manner.

WHAT IS A COMPLAINT

A "Complaint" refers to any expression of dissatisfaction about the manner in which ICWIC, its agents or its brokers has carried out its functions, or the conduct of the Company's management, employees or persons acting on its behalf in the purported exercise of such functions.

TYPES OF COMPLAINTS

A client may file a complaint for several reasons, including but not limited to:

- Our intermediaries (agents and brokers)
- The performance of duties
- The conduct of staff
- Service standards
- A policy, a service or product offered by ICWIC
- The claims process

HOW TO SUBMIT COMPLAINTS

Complaints and feedback about ICWIC can be provided by clients in various forms, including:

1. **In person**- Written complaints may be hand delivered using the specified form using two methods:

- To the General Manager or other designated officer
- Via the Suggestion/Comments box located in the lobby

2. **Via ICWIC's website (Recommended)-**complaints may also be submitted using the electronic form available on our website. By navigating to the "Customer Care" section, then selecting the option "*Service Feedback*", clients can complete the feedback form available.

3. **By telephone**- A client may offer a verbal complaint by contacting our office at (345) 949-6970.

4. **By email**- written complaints may be submitted to the following email address: cayman@icwi.com

5. **By the media (newspaper, social media, etc.)-** In instances where a staff of ICWIC is made aware of a complaint via the media, the General Manager or other designated officer may contact the client (where possible) to garner additional details on the complaint.

6. **By the Cayman Islands Monetary Authority (CIMA) -** This should only be utilized as a last resort, where the client is not satisfied with the outcome of the investigation into a complaint by ICWIC. Complaints may be filed on the regulators website (https://www.cima.ky/complaints)

CRITERIA FOR SUBMITTING A COMPLAINT

In submitting complaints, clients should ensure that:

1. The complaint is submitted in writing, especially in cases where a verbal complaint was first submitted;
2. Their name, contact details, and a general description of the complaint are also provided;
3. Any relevant documents or evidence that support the complaint (where applicable), are also submitted.

PROCESS FOR RESPONDING TO COMPLAINTS

In responding to complaints received, ICWIC shall:

1. Acknowledge each complaint in writing within five (5) business days of the complaint being received;
2. Provide the complainant with the name of one or more individuals appointed to be the complainant's point of contact in relation to the complaint until the complaint is resolved;

3. Provide the complainant with regular written updates on the progress of the investigation of the complaint at regular intervals;
4. Ensure that all complaints are appropriately investigated (where possible) and resolved as soon as possible after having received the complaint. Complaints received should reasonably be resolved within forty-five (45) business days of receipt. Where this is not possible, the complaints should be appropriately escalated to be addressed.
5. Where the time period stipulated for handling complaints has elapsed before the complaint is resolved, the complainant should be informed of the anticipated timeframe within which the complaint is expected to be resolved.
6. The complainant should be advised in writing of the outcome of the investigation, as soon as possible after the completion of the investigation of a complaint, and where applicable, explain the terms of any offer or settlement being made.

INTERNAL REVIEW PROCESS

Complaints received from clients or CIMA should be addressed and investigated in a timely manner and shall ordinarily be handled at the branch level by the General Manager or other designated officer. If an employee is the subject of the complaint, that employee should not be included in the complaint's handling process in order to ensure a fair and objective outcome.

The General Manager or other designated officer may direct complaints based on its nature, to the appropriate department (accounts, claims, marketing, human resources, operations, etc) to be addressed. In instances where a complaint remains unresolved, the complaint should be escalated to the appropriate Head of Marketing, Distribution and Human Resources.

If a resolution is not found between the Company and the complainant, the client should be advised of their right to take their complaint to the Cayman Islands Monetary Authority (CIMA). In this case the General Manager is to prepare a letter on Company letterhead to the CIMA stating the Company's final position regarding the complaint.

COMPLAINTS REGISTER

All complaints received should be recorded in the complaints register. Complaints submitted via the suggestion/comments box, are to be cleared and logged weekly by the General Manager or other designated officer and appropriately recorded in the complaints register. The register should contain sufficient information about the complaint and should outline the measures taken for its resolution.

The complaints register should be maintained in accordance with record keeping procedures, and shall also be made available to management or the regulatory authority upon request.

Reports on Complaints

A quarterly report of complaints received is to be submitted to the Group Marketing Department indicating the nature of the complaints. This is to ensure reliable identification of trends in the number, regularity and subject matter of complaints and feedback. Quarterly reports are to include; date complaint was received, complainants name and contact information, nature of the complaint (summary), action taken, date complaint was closed.

A summarized report or a statement of complaints received shall also be submitted to the Board of Directors, at intervals to be determined by Management. The reports should include information such as the nature of issues, volume, frequency, how the issues were addressed, and disciplinary actions undertaken for non-compliance (where applicable).

LEGISLATIVE REFERENCE

This policy is largely informed by the following guidance notes issued by the Cayman Islands Monetary Authority (CIMA):

1. Statement of Guidance-Market Conduct for Insurers, Agents and Brokers, May 2018
2. Rule- Corporate Governance for Regulated Entities, April 2023
3. Rule and Statement of Guidance-Internal Controls for Regulated Entities, April 2023

POLICY REVIEW CYCLE

This policy is subject to review every three (3) years or where there are legislative changes or changes to the guidance notes that will impact the programme. Any changes to this policy will be subject to Board of Directors approval.

VERSION HISTORY

Classification: Marketing			
Version	**Description**	**Approved By**	**Approval Date**
1.0	Approved as a part of the AML/CFT/CPF Policy	ICWIC Board of Directors	September 7, 2018
1.1	1. Creation of a standalone document. 2. Review to align the policy with current guidelines	ICWIC Board of Directors	