

GUINEA INSURANCE PLC COMPLAINTS POLICY AND PROCEDURE

1.1 Introduction and Scope of the Policy

This Complaints Policy (the "Policy") is pursuant to section 8(a) of the National Insurance Commission Act 1997 to guide the company procedures to effectively manage and resolve complaints from clients and members of the general public.

Our management and staff are duly trained to respect the right of members of the public to complain about the standard of services provided by the company. Our core values of teamwork, service, commitment, integrity and professionalism speaks of our dealings with our insured and general public.

The company strives for fairness, equitable and timely resolution of complaints is described in this Policy.

1.2 Purpose

The purpose of the Complaints Handling Policy is to:

- Recognise customers' rights to complain.
- Provide an efficient, fair and accessible mechanism for resolving customer's complaints.
- Provide information to customers on the company's (Guinea) and the National Insurance Commission's (NAICOM) complaints handling process.
- Demonstrate Guinea's commitment to continual improvement on Its services

1.3 Definitions

Claimant means a person or a legal representative of a claimant who has a claim with the company

Complaint means a genuine expression of concern or dissatisfaction regarding the rendered services, or the complaints handling process itself, made to the company by the claimant or on behalf of:

- a claimant;
- an individual client - including government agencies;
- a group or member of the public.

Complaint does not necessarily mean a dispute with a decision or policy of Guinea. In particular, a complaint does not mean a dispute with:

- Guinea's assessment of liability with respect to a claim;
- Guinea's settlement offer on a claim;
- Guinea's assessment of, and payments for;
 - Special Damages, being reasonable expenses related to the treatment of injuries received in a crash, together with compensation for any loss of earning capacity sustained.
 - General Damages (Non Pecuniary Loss), being damages awarded for pain, suffering and inconvenience experienced as a result of injuries, together with any disability.

1.4 Mode of Complaint

A complaint may be made in person, by phone, fax, via email or company's website, in writing or verbally. However verbal complaints is documented immediately by the employee who receives the complaint.

Complainant means the person, group, organization or general public making the complaint.

Client/Customer means a person or organisation receiving advice, a service, using the facilities, or engaged in a business relationship, or any other person or organisation having an interest in the functions or activities of the company.

Dispute means a customer's formal disagreement with the services of Guinea which leads to some type of internal or external review or determination.

Organisation means a company, firm, enterprise or association, or part thereof, whether incorporated or not, public or private, that has its own function(s) and administration.

2.1 Commitment

We are committed to efficient and effective complaints management. Our commitment involves:

- An organisational culture that welcomes complaints as an opportunity to continually improve on our services
- the development and maintenance of a computerised Complaints System to manage complaints;

- the adoption and dissemination of this policy 'Complaints Handling Policy'; and
- reporting information about complaints management in executive and Board meetings and reports.

3.1 Fairness

We recognise the need to be fair to both the complainant and the company or employee against whom the complaint is made.

If a customer complains, we will:

- treat the complainant with tact, courtesy and fairness at all times;
- maintain appropriate confidentiality of the complaint at all times;
- not victimise or harass the complainant as a result of any complaint he/she makes against us;
- not discriminate against the complainant because of any disability, his/her tribe, religion, age or sex.

4.1 Complaints about employees

Complaints against employees should be referred directly to the relevant Team Lead and a determination will be made whether the complaint is an alleged breach of our Code of Conduct as defined by NAICOM Act 1997, the Team Lead should obtain further information and guidance on this from the Team Lead, Human Capital and Management on how to handle the complaint.

Where and when appropriate, and in consideration our obligation for fairness to the complainant and employee, the employee will be given the opportunity to defend his stand.

The party concerned will be informed of the final resolution/decision and the reason for arriving at that decision, a copy of the final resolution will be sent to both parties.

5.1 Resources

The company's call centre is equip with the resources to handle complaints by way of a customised computerised Complaints System that is available to complainant, employees and management for the recording complaints.

In addition, our customer call centre personnels are trained in the skills of listening, problem solving, and conflict resolution. Complaints beyond their control are reported to the appropriate quarters for resolution and feedback.

Our customer Complaint Policy is covered during the induction program for all new employees.

Employees who demonstrate our core Values in the resolution of customer complaints are recognised and rewarded through our Hall of Fame. Whilst those that goes otherwise are disciplined appropriately.

6.1 Visibility of the complaints process

We promote the existence of our Complaints Policy and Complaints System through:

- (i) A direct link to 'Complaints' on the front page of our website.
- (ii) 'Availability of How to make a complaint brochure in the Insurance Commission reception area'.
- (iii) A brochure titled How to make a complaint which is available on Insurance Commission website or upon request.
- (iv) Publishing the numbers and categories of complaints we receive and the resulting improvements we have made in executive and Board reports.

7.1 Access to the complaints process

A person wishing to make a complaint may do so in person, by telephone, by letter, by fax, by email or via our website.

All complaints made with us will be lodged via a 'Complaint Form', and recorded on to our Complaints System.

A person may lodge a complaint by filling out and completing a 'Complaint Form' at any of our branches or through a drop a message on our website.

For complaints made in person or by telephone, letter, fax, or email, one of our staff members will complete a Complaint Form on behalf of the complainant and attach any associated correspondence that has been received via letter, fax, email.

8.1 Assistance with lodging complaints

Our staff will assist people who may have difficulty making a complaint. For example, interpreters can be provided to assist people with limited English who would prefer an interpreter.

In addition, staff will complete a Complaints Form on behalf of anyone making a complaint over the phone or in person. They will also assist those with limited literacy skills by confirming the details of the complaint verbally.

9.1 Complaints made on behalf of another person

If it is difficult for a customer to personally make a complaint, a complaint may be made on his/her behalf by another person or legal practitioner.

10.1 Responding to complaints

If a customer complains, we will:

- attempt to resolve the complaint at the first point of contact, where possible;
- acknowledge receipt of the complaint not later than two working days;
- where a complaint is not fully understood, telephone the person who lodged the complaint to ensure we understand the issues correctly; and
- for complaints not resolved "on the spot", aim to resolve the complaint and issue a response within 5 working days.

If these time frames cannot be met, we will tell the complainant why and give some idea of when we will reply in full.

We may, at any time after receiving a complaint, decide not to deal with the complaint, or to stop dealing with the complaint, because:

- a) it does not relate to a matter we have power to deal with;
- b) it is frivolous, vexatious, misconceived or lacking in substance; or
- c) having regard to all the circumstances of the case, the enquiries into, or the continuance of the enquiries into the matter raised in the complaint, is unnecessary or not justified.

The legal unit, in consultation with other relevant senior staff, will make decisions of this nature where appropriate. If we decide not to deal with a complaint, or to stop dealing with a complaint, we will inform the complainant of the decision and the reason(s) for the decision.

11.1 Charges

No fee is charged for any complaint lodged.

12.1 Complaints Bureau System

We have a specialised Complaints System for recording, managing and reporting of complaints. This system enables complaints to be managed at various stages by various staff.

First stage: Recording and acknowledgment of the complaint and attempted resolution by front line staff.

Second stage: If the complainant is still not satisfied, a more senior staff member such as a Team Lead will review the person's complaint and the results of the review will be reported to the complainant and management.

If the complainant remains dissatisfied, we will consider other options that may be available to achieve a resolution.

Third stage: If the complaint cannot be resolved by the Insurance Commission, the complainant will be referred to an outside agency, such as the Ombudsman.

13.1 Remedies

We will endeavour to resolve all complaints received as fairly as possible and in a timely manner. Some of the remedies that we may use to help resolve complaints include:

Rectify mistakes

Where we have made a mistake, taken too long to follow up a matter, or simply overlooked a matter, we will take immediate action to rectify the mistake or situation.

Employee training and counselling

Where a complaint is made about an employee, whether it is about the employee's general manner or about the employee providing wrong information, and after investigation if we consider the complaint is justified, the employee will be provided with training and/or counselling.

Referral

As outlined in this Complaints Policy, if a complaint cannot be resolved by us, the complainant may be referred to the Ombudsman for insurance matters, The National Insurance Commission.

14.1 Collecting and recording information about complaints

Complaint data will be recorded using the Complaint Form. Complaint data will be collected, analysed and reported using our Complaints System. Complaint data, enquiry outcomes and service improvements will be reported regularly to our management and Board of committee on Compliances.

15.1 Storage of complaint records

Records of all complaints will be retained in our Complaints System, for confidentiality, monitoring and evaluation purposes. Access to the complaints records will be restricted to authorised staff.

16.1 Categorising complaints

Complaint data is collected, collated and reported in categories to enable us to identify policies, practices, facilities, etc. that are in need of review and that also contribute to improved customer focus and business outcomes.

17.1. Review

The Complaints Policy will be reviewed at regular intervals to ensure it meets regulation and statute.

18.1 Enquiries

Direct enquiries about the Complaints Policy to:

The Managing Director
Guinea Insurance Plc
Guinea Insurance House
33, Ikorodu Road, Jibowu
Lagos State

Postal Address:
P.O. Box 1136, Lagos
Lagos State

Telephone: +234-1-2934575
Email: info@guineainsurance.com
Website: www.guineainsurance.com