

Complaints management Policy

OBJECTIVE

This procedure describes the principles and processing of customer complaints.

All complaints in any form, valid or not, should:

- receive an appropriate response as soon as possible
- be treated with diligence, transparency, objectivity and professionalism
- trigger if needed the implementation of improvement and/or preventive measures

The complaint is the statement of dissatisfaction towards:

1. services, advices or products provided
2. employees in charge of the transactions or the business relationship
3. Foyer International S.A.

PROCEDURE

Complaints should be made in writing (letter, e-mail, fax), by phone or face to face (visit, meeting).

Complaints are likely to come from persons other than the "client."

We distinguish different categories of complainants:

1. "Client" natural person, legal person

Subscriber, Co-subscriber, Insured person, Legal representative of the legal person, Person who has a special mandate, Beneficiary

2. "Partner"

Any partner within the limits of the professional secrecy and the contract and powers connecting us to such partner. Business introducer, Broker, Agent.

3 "Third party"

Anyone considered as third party to the business relationship and who is authorized and empowered by the client with a special mandate. It is important to ensure strict observance of the professional secrecy and analyse the scope of the mandate. In the absence of a valid mandate, the professional secrecy must be opposed.

Written complaints may be sent by post, fax or email directly to the Management of Foyer International SA.

All complaints will be dated at the time of their receipt. The complaints are submitted to the Head of the Internal Control who is responsible for forwarding a copy / original to the head of the department concerned who will be responsible for processing the complaint.

Face to face complaints may be made by the "client" during a visit or a conversation. If the complaint appears to be circumstantial, the employee to whom the complaint is made:

- invites the client to put down his complaint in writing **or**
- if the complaint may have a **financial impact or is of a compliance nature** (for example: non-respect of the law, fraud, etc. ...), the employee prepares a detailed report, dated and signed and submits it to the Head of Internal Control.

Complaints management Policy

The Head of Internal Control will send copies of the complaint to the various persons concerned.

The complaint may also be sent directly to the Supervisory Authority, which transmits it to Foyer International SA as well as requesting information for ensuring:

- the application of legal, regulatory or statutory requirements,
- the appropriate treatment of the complaint,
- that a position and/or decision is taken following the complaint.

After the receipt of a complaint, an answer will be sent to the “client” as soon as possible. It will be either:

- a **letter** explaining that the complaint is complex and/or that more time is necessary to analyse the facts for an appropriate answer to be given to the “client” or
- an **appropriate response** sent to the client.

CONTACT

Complaints made by e-mail should be sent to the e-mail address: contact@foyerinternational.lu. Telephone complaints can be made to the following number: +352 43 743 5200. Postal complaints should be sent to the following address:

FOYER INTERNATIONAL S.A.
L-2986 Luxembourg

The following information should be included to support the complaint, so that it can be processed as quickly as possible: surname, first name, status of the client, complete postal address, telephone numbers; where applicable an e-mail address and a concise description of the subject matter of the complaint together with any documents or information concerning the product or the insurance department concerned.

DISPUTES

In the event of dissatisfaction regarding the processing of the complaint, the person requesting the insurer may also contact:

- the *Association des Compagnies d'Assurances* B.P. 448, L-2014 Luxembourg;
- the *Union Luxembourgeoise des Consommateurs* (ULC) 55, rue des Bruyères, L-1274 Howald;
- the *Commissariat aux Assurances* 7, boulevard Joseph II, L-1840 Luxembourg;
- the competent Supervisory Authority of his country of residence
see IAIS : <http://www.iaisweb.org/About-the-IAIS/IAIS-members-31>;

without prejudice to the ability of the person filing the complaint to initiate legal action.