

## **PROCEDURE OF HANDLING COMPLAINTS OF “MARSH” SIA**

The insurance brokerage company MARSH SIA (hereinafter referred to as - the Company) handles complaints about distribution of insurance performed by the insurance ancillary service intermediaries, registered in the register by its employees directly involved in the distribution of insurance or reinsurance and employees of the ancillary services intermediaries of the Company (if any).

An employee of the Company directly involved in the distribution of insurance and reinsurance is a person who has the knowledge and skills necessary for distribution of insurance and who is entitled on behalf of the Company to engage in the distribution of insurance and/or reinsurance. This procedure is developed and approved by the board of the Company, on the basis of the type, size, and organisational structure of the Company. It shall ensure fast, equal, fair and effective handling of complaints.

The Company shall ensure that the persons involved in the handling of complaints are introduced with the procedure and that it is available to all employees of the Company directly involved in the distribution of insurance and reinsurance.

Handling of complaints shall always be free of charge.

### **What does a Complaint and a Claimant mean?**

A Complaint shall mean a notification of the Claimant regarding dissatisfaction with the distribution of the insurance or reinsurance performed by the insurance ancillary service intermediary registered in the register of the Company or the additional service intermediary of the Company (if any).

For the purpose of this procedure, a notification which does not contain the name, surname, and information that allows one to clearly identify this person, no name and registration number for legal entities, shall not be considered a Complaint.

Claimant is a person who has the intention to conclude an insurance or reinsurance contract, a policy holder, the insured person, or a person eligible for indemnity in accordance with the concluded insurance contract and reinsurance.

### **Person responsible for handling complaints**

Person responsible for the handling of complaints in the Company (hereinafter referred to as - the Responsible Person):

Senior Insurance Broker / Corporate Governance Officer – Ants Grende

The Responsible Person shall be responsible for the process of handling of complaints, registration of the complaint, and provided replies in the Complaints Register of the Company. The Responsible Person shall ensure the compliance of examination of facts specified in complaints, control of efficiency of the process of handling of complaints, elimination of potential conflicts of interest, and reporting with this procedure for handling of complaints, and shall perform examination and analysis of facts specified in the complaint, taking into account prevention of the potential conflict of interest for handling of complaints.

### **The complaint may be filed by:**

- Electronically to the e-mail address: [riga.office@marsh.com](mailto:riga.office@marsh.com);
- submitting personally in the office of MARSH SIA at 1 Roberta Hirsā street, Rīga, LV-1045, Latvia;
- sending by mail to address: 1 Roberta Hirsā street, Rīga, LV-1045, Latvia;

### **The following should be indicated in the complaint:**

- the addressee of the complaint – the Company;
- the name and surname of the author of the complaint (for a legal person – the company name);
- personal ID number (registration number for a legal person);
- place of residence or declared address (for a legal person – legal address);
- telephone number and email address (if there is such);

- employee of the Company or additional service agent of the Company (if any) regarding the action of whom the complaint is submitted;
- factual circumstances of the complaint
- date and place of complaint, and signature.
- the complaint shall be enclosed with substantiating documents or approved copies thereof. If an authorised person of the claimant has submitted the complaint, the complaint shall be accompanied with an authorisation or a certified copy thereof.

## **Personal Data Protection**

The Company is registered with the State Data Inspectorate with the processing registration number 003311.

The Company shall protect any information submitted by the claimant and ensure protection of the personal information of the claimant, in accordance with the provisions of the General Data Protection Regulation and Privacy Policy (*PRIVACY POLICY*), which is available on the website of the Company - <https://www.marsh.com/lv/en/privacy-notice.html>

## **Process of handling complaints, duties, deadlines, and arrangement**

After receipt of the complaint the Responsible Person shall register it in the Complaints Register, where also the replies provided to the claimant are registered, not later than on the next working day after receipt of the complaint.

The Responsible Person shall include in the Complaints Register at least the following information:

- information about the Claimant (for a natural person - name and surname; for legal entity - name, registration number) and its contact information;
- date of receipt of the Complaint;
- reason of Complaint;
- insurance type;
- date of the response to the Complaint;
- the outcome of handling of the Complaint;
- country where the insurance and reinsurance distribution was carried out regarding which the Complaint was received.

After registration of the Complaint in the Complaint Register, the Responsible Person shall perform examination of the facts specified in the Complaint and the evidence enclosed with the Complaint, and shall provide a written reply to the Claimant within the time periods provided for in this procedure.

Upon evaluating the Complaint, the Responsible Person shall perform the following activities:

- prevent any conflict of interest during handling of the Complaint in the following way, if any is established:
  - if the Complaint is submitted about the employee who is the Responsible Person, then all duties of the Responsible Person determined in this procedure about handling of the Complaint, as well as responsibility in relation to such Complaint, shall be undertaken and performed by any other person appointed by the board of the Company for handling of the particular Complaint.
  - If the Complaint is submitted about a member of the board of the Company, this board member shall not participate in any decision-making related to handling of the Complaint.
  - If the Complaint is submitted about the sole member of the board of the Company, then the member of the board of the Company shall appoint any other person for handling of the particular complaint and such circumstances shall be specified in the reply to the Complaint.
- request explanation from the employee specified in the Complaint and examine the facts specified therein;

- if necessary, request the Claimant to clarify the information about facts and circumstances specified in the Complaint, and shall request the necessary additional documents and evidence for objective handling of the Complaint;
- if necessary, examine the information at the disposal of the agent of the insurance's additional service (if the Complaint is submitted about the ancillary service intermediary) registered in the Register of the Company or Register of Ancillary Service Intermediaries of the Company;
- if necessary, obtain additional information from public registers and other public information sources;
- if necessary, request explanations or additional information from other employees of the Company or the employees of an insurance ancillary service intermediary registered in the Register of Ancillary Service Intermediaries (if the Complaint is made regarding an ancillary service intermediary);
- if necessary, ask for additional information from other persons that are not employees of the Company, or from the employees of an insurance ancillary service intermediary registered in the Register of the Company or Register of Ancillary Service Intermediaries of the Company.
- at the request of the Claimant, provide information (in writing or electronically) on the process of handling of the Complaint.

After evaluation of the Complaint, the Responsible Person shall prepare and send to the Claimant a justified reply based on a comprehensive and objective assessment of the evidence and information contained in the Complaint and obtained during the Complaint handling process, in as simple and understandable language as possible.

In reply to the Complaint, the Responsible Person shall inform the Claimant also on other possibilities for handling of the Complaint, if the reply provided to the Complaint fails to eliminate causes of the Complaint, shall indicate whether the Company agrees or disagrees with the complaints made, and shall present its attitude towards substantiation of the Complaint.

If the Company agrees with the claims made in the Complaint, in the reply letter it shall specify if the Claimant may receive any compensation for losses and according to what procedure, and if such incur, and if these losses are direct, subsequently related to the conduct of the employee of the Company with regard to whom the Complaints are made.

If the Company disagrees with the claims made in the Complaint, it shall specify the facts, circumstances, and documents in the reply letter that create the grounds for the rejection of the claims made by the Claimant.

If the Company establishes that the claims made in the Complaint do not apply to the conduct of the Company or that the claims made in the Complaint are made about a person who is not an employee of the Company, the Claimant shall be informed thereof in writing.

Response to the Complaint shall be provided in Latvian. If the Claimant has submitted the Complaint in another language, the Company may provide a response in the language in which the Claimant addressed it, if it does not cause additional administrative costs.

The Responsible Person, or a person appointed for elimination of the conflict of interest after comprehensive and objective assessment of the evidence and information specified in the Complaint and obtained during the process of handling of the Complaint, as well as drawing up a reply shall make an analysis on the cause of the Complaint and necessary measures for elimination thereof.

The Company shall have an obligation to provide a substantiated written reply to the Complaint of the Claimant within a time period of 20 days from the day of submission of the Complaint. If due to objective reasons it is not possible to give a reply within the above-mentioned time period, the Company shall have an obligation to provide justified information on the need to prolong the time period for giving a reply and a reasonable time period in which the reply will be provided. Objective reason for prolongation of the time period shall be, but is not limited to, failure to receive the replies and documents necessary for high quality and objective handling of the complaint from the Claimant within the time period requested by the Responsible Person.

If the Company receives a Complaint about any other participant of the market, but is not entitled to handle it, the Company shall forward it to the relevant participant of the market within a time period of seven days from the day of receipt of the Complaint and shall inform the Claimant of that.

The Company shall save the information about the received Complaints and provided replies, in accordance with the requirements determined by internal regulatory enactments of the Company on the storage and archiving of documents.

The Responsible Person at least once per the reporting year shall prepare a report on the compliance of the process for handling of complaints with the procedure for handling of complaints and efficiency of the process for handling of complaints, shall include in the report any information about the analysis of complaints, and shall provide an assessment about the causes of complaints. The Responsible Person shall submit the above-mentioned report to the board of the Company, which shall perform measures for elimination of the established causes of complaints at least once a year after review of the report of the Responsible Person. Control of performance of measures necessary for elimination of causes of complaints shall be assigned to the Responsible Person.

### **Disputes between the Claimant and the Company, and the supervisory authority**

Disputes between the Company and the Claimant shall be settled by the authority established by the Latvian Association of Professional Insurance Brokers (Ombudsman), address: Čiekurkalna 1. līnija 33, Rīga, LV-1026, Latvia, e-mail: [ombud@aa.lv](mailto:ombud@aa.lv).

Supervisory authority of the Company shall be the Latvijas Banka, address: 2A Krisjana Valdemara street, Rīga, LV-1050, e-mail: [info@bank.lv](mailto:info@bank.lv), phone No. +37167022300, website [www.bank.lv](http://www.bank.lv).

Procedure for handling of complaints is available in the office of MARSH SIA at 1 Roberta Hirsas street, Rīga, LV-1045, Latvia, and on the website: <https://www.marsh.com/lv/en/home.html>

Approved on 02.10.2024    Chairman of the Board Z. Gaspazins and the authorised person A. Grende

A.Grende; [ants.grende@marsh.com](mailto:ants.grende@marsh.com)