



Client Complaint Handling Policy

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Statutory Obligations

We are required to establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints or grievances received from Clients, and to keep a record of each complaint or grievance and the measures taken for its resolution.

Detailed description of Procedures

General:

- a) The procedures for handling Clients' complaints established, implemented and maintained by the Company should:
 - be simple and clear
 - ensure that Clients are treated fairly
 - be effective and aid decision making
 - ensure fair outcomes.
- b) The complaints handling arrangements established by the Company should be known and easily accessible to Clients.
- c) The Company is required to examine all complaints received from Clients and inform them of the outcome.
- d) The Company shall keep records of complaints where all the information and documents relating to the submitted complaints are included, as well as the final outcome of these.

Assignment of responsibility:

The General Manager is responsible for handling client complaints, in co-operation with the affected departments.

The Company should register internally complaints within three (3) working days of their receipt, in a complaints file, and must acknowledge in writing to each complainant within two (2) working days of the receipt of the complaint. On request, or when acknowledging receipt of a complaint, the Company must provide written information regarding their complaints handling process.

All departments which offer insurance services or perform support functions are required to handle complaints honestly and with professional integrity. Withholding information about a complaint submitted by a Client is an internal offence and may lead to disciplinary action.

All complaints should be resolved promptly and within a maximum of fifteen (15) working days from the date of the official receipt of the complaint. When an answer cannot be provided within the expected time limits, the Company should inform the complainant, in writing, about the causes of the delay before the expiry deadline and indicate the time period within which the Company's investigation is likely to be completed. The additional time limit should not be more than thirty (30) working days from the expiry of the initial deadline of the fifteen (15) working days.

When providing a final decision that does not fully satisfy the complainant's demand, the Company should include a thorough explanation of their position on the complaint and set out explicitly the complainant's option of the possibility to appeal to a competent authority, an ombudsman or alternative, out-of-court mechanism.

All complaints must be submitted in the following ways by the Client, or a person authorised to act on behalf of the client, and should be as descriptive as possible in respect of the events that led to the filing of the complaint:

In writing to: General Manager
Felicitas Insurance Services
P.O Box 59619, 4011
Limassol, Cyprus

Via email: admin@fmgroupinternational.com

Complaints which do not contain the name and other details of the applicant will not be considered. If a Client communicates a complaint verbally, he/she should kindly be asked to contact the General Manager/member of administration department who will then explain the procedure for handling complaints to the Client.

A standardised form is used (the 'Client Complaint Report') as a template to guide the General Manager in carrying out the investigation and it is also instrumental in providing a one stop trail of all actions and decisions taken in respect of the complaint. Copies of all resolution letters are kept by the General Manger to have a clear audit trail for all complaints.

If, in the process of investigating a complaint, certain shortcomings in the internal procedures become apparent, remedial action is undertaken and recorded on file.

Recording the outcome of the investigation:

The General Manager handling the case prepares a 'Client Complaint Report' describing objectively and in detail:

1. The identification particulars of any Client having made a complaint
2. The Insurance service to which the complaint pertains
3. The particulars of the employee(s)/ appointed agent responsible for the service/s rendered to the Client
4. The date of receipt and of registration of the complaint
5. The content of the complaint in brief
6. The date of acknowledgement of complaint to complainant
7. Reference to any correspondence exchanged between the Company and the Client, which should be attached to the Company's file.
8. The results of the investigation and the proposed course of action

Record Keeping:

All the files, documents, data and information related to the investigation are held in hard copy files and are also converted and saved in electronic format and embedded as electronic file attachments on the report and held on the Company's CRM.

Outcome of the complaint:

The report issued by the General Manager is delivered to:

- The Head of the relevant department for remediation
- The Board of Directors in cases where: The Client is demanding compensation, the investigation has revealed serious omissions or malevolent behavior on the part of the Company employees, irrespective of whether the Client is making a claim for compensation or not.

The receipt of the report is witnessed by the placing of the signature of the persons named above.

Any correspondence to be sent to the Client in response to the complaint is sent by email or registered mail or courier, providing a full audit trail.

Decision on a complaint

After a conduct of investigation, one of the following decisions may be taken:

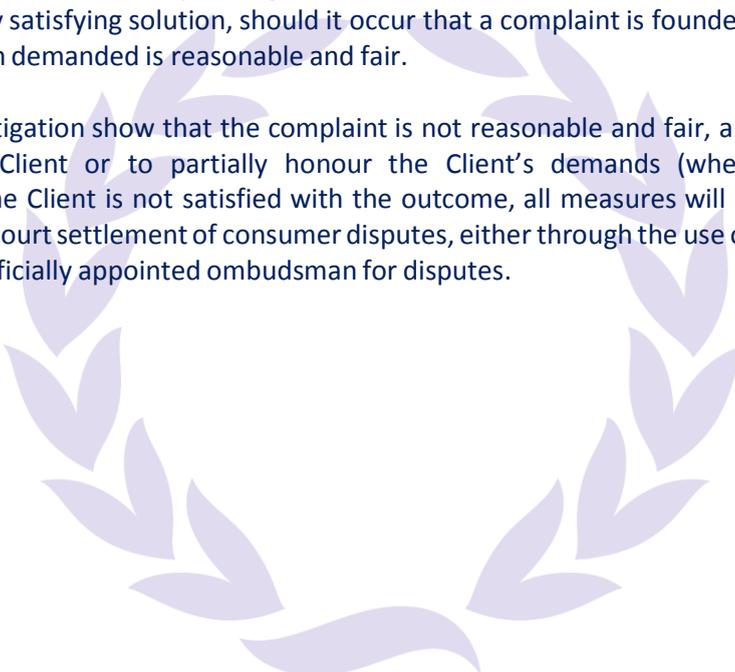
- Full or partial satisfaction of the complaint
- Refusal of the complainant satisfaction

Resolutions of disputes with Clients:

In applying high ethical standards, Felicitas Insurance Services, when providing services to Clients, acts honestly, fairly and professionally in the Client's best interests and fully complies with provisions of fair treatment for the protection of the Client.

The company extends every effort to handle Client complaints honestly, fairly and professionally in the Client's best interests. Each and every manager and staff member involved in the investigation should strive to arrive at a mutually satisfying solution, should it occur that a complaint is founded on reasonable grounds and the compensation demanded is reasonable and fair.

If the results or investigation show that the complaint is not reasonable and fair, and the decision is taken not to honour the Client or to partially honour the Client's demands (when the Client demands compensation) and the Client is not satisfied with the outcome, all measures will be taken to resolve the matter by the out-of-court settlement of consumer disputes, either through the use of a mutually acceptable ombudsman or the officially appointed ombudsman for disputes.



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