

# Complaints Handling Guidelines

 **CHINABANK**  
**INSURANCE BROKERS, INC.**  
a subsidiary of CHINA BANKING CORPORATION

## Section 1 – DEFINITIONS OF TERMS

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The following definition of terms shall apply in this Guidelines:

1. **Complaint** - any expression of dissatisfaction, whether oral or in writing, by or on behalf of a client regarding the service provided by CIBI to the client, including in any event complaints about the conclusion or performance of a contract for professional services, the quality of the service or the amount of the invoiced fee;
2. **Complainant** - a client who makes a complaint, either personally or through a representative;
3. **Complaint form** - an internal form to be used by the complaints committee in applying the procedure laid down in the complaint handling guidelines (see Annex “A”);
4. **Complaint handler** - the person charged with handling a complaint on behalf of the complaints committee;
5. **Complaints Committee** – a body in charge of monitoring and ensuring that complaints made against any CIBI employee is properly addressed and resolved.

## Section 2 – OBJECTIVE

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The objective of these complaint handling guidelines is:

- 1.** to establish a procedure by which complaints can be constructively resolved within the shortest possible period of time;
- 2.** to establish a procedure for identifying the causes of a complaint;
- 3.** to help maintain and improve existing client relationships by handling complaints in an effective and solution-oriented manner;
- 4.** to impress on all employees of the company the importance of handling complaints in a client-friendly manner;
- 5.** to improve the quality of the service by adequately handling and analyzing complaints;
- 6.** to prevent disputes with clients from possibly escalating into a claim for liability or the submission of a disciplinary complaint.

## Section 3 – NOTIFICATION OF COMPLAINTS HANDLING GUIDELINES

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If a client has made a complaint, or there are reasonable grounds for assuming that the client is considering making a complaint about one or more employees of the company, **each employee of the company has a duty to inform the client of the existence of the complaint handling guidelines.**

## Section 4 – COMPLAINTS COMMITTEE

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To ensure that all complaints are properly addressed and resolved, a Complaints Committee shall be formed and comprised of senior and junior officers of CIBI who shall monitor all incidents of complaints made. The committee shall be comprised of:

1. Complaints Committee Head
2. Two (2) Complaints Committee Members

Responsibilities of the Complaints Committee:

1. Provide orientation to all employees of CIBI on the importance and use of a Complaints Handling Guidelines
2. Appoint of a complaint handler in every case
3. Monitor every case of complaint filed with the Committee until it is resolved
4. Ensure that all agreements made with the complainant are properly recorded in writing
5. Ensure that complaint is elevated to the CIBI Board in the event of:
  - I. Complainant suffering financial loss due to subject matter of a complaint and CIBI may be held liable,
  - II. Complaint has not been resolved upon completion of the complaint handling procedure

## Section 5 – PROCEDURES

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**5.1. Each employee of the company who becomes aware of a complaint made in a case in which he or she is involved must give notice of this to the complaints committee once it becomes apparent that the complaint cannot be immediately resolved in proper consultation with the client.**

**5.2.** After becoming aware of a complaint, the complaints committee appoints a complaint handler. The complaint handler immediately contacts the employee or employees of the company against whom the complaint is made.

**5.3.** The employee or employees of the company concerned and the complaint handler together decide who should contact and keep in touch with the complainant and how the complaint should be discussed and resolved with the complainant. In the event of a difference of opinion about how the complaint should be handled the complaint committee has the last word. The complaint will then be handled in this manner and, if possible, resolved. Within a month of receipt of the complaint, the complaints committee will give written notice to the complainant and the person against whom the complaint is made of whether or not the complaint is deemed to be well-founded, stating the reasons and possibly also making recommendations. If the period of a month is exceeded, the complaints committee must notify the complainant and the person against whom the complaint is made of the reason for the delay and inform them within what period they can expect to receive an opinion on whether the complaint is well-founded.

**5.4.** If the contacts referred to in paragraph 3 of this section with the complainant do not result, without further measures, in resolution of the complaint in a manner satisfactory for the complainant, measures may be taken either by the complaint handler or by the relevant employee of the company (who may only do so after obtaining the approval of the complaint handler) to resolve the complaint, such as:

- a) transferring the case to one or more other employees of the company;
- b) having the case dealt with by the Complaints Committee.

**5.5.** To avoid any misunderstanding, it should be noted that the measures referred to above are merely examples and that other measures too are possible. Whatever measures are taken, they cannot constitute an acknowledgement of liability and will not therefore result in the payment of damages; the consent of the CIBI Board is always required for this purpose.

**5.6.** Agreements made with the complainant will be carefully recorded in writing by or under the supervision of the complaint handler, regardless of whether or not the complaint is resolved to the complainant's satisfaction.

**5.7.** If there is a justified expectation that a complainant may suffer financial loss as the result of the subject matter of a complaint and that CIBI may be held liable for this, the complaint handler will inform the Complaint Committee and CIBI President, who in turn should inform the CIBI Board.

**5.8.** The complainant is not charged for the costs of the complaint handling.

**5.9.** If the complaint has not been resolved upon completion of the complaint handling procedure, the CIBI President together with the Complaint Committee will be the competent authorities to hear the complaint.

## Section 6 – MISCELLANEOUS PROVISIONS

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**6.1.** Each employee of the company involved in a complaint is personally responsible for the proper handling of the complaint in accordance with the provisions of these complaint handling guidelines. The complaint handler has overall responsibility for the handling of the complaint and the implementation of these guidelines. The complaint handler is also responsible, wherever possible, for concluding and performing agreements with the complainant.

**6.2.** Each employee of the company is obliged to cooperate fully with the complaints committee or complaint handler in handling a complaint, regardless of the identity of the person against whom it is made. All information requested by the complaint handler should be supplied immediately and in full.

**6.3.** An employee of the company who is involved in a complaint must refrain from communicating in any way whatever with the complainant about the complaint and its handling as long as there has been no consultation with the complaint handler about the substance and manner of communication, and even after such consultation he or she may communicate only in accordance with the agreements made with the complaint handler.



## **Section 7 – APPLICABILITY AND PROFESSIONAL GUIDELINES**

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These complaint handling guidelines apply to all employees of the company, subject to all professional guidelines and codes of conduct applicable to them.

## CIBI CUSTOMER COMPLAINT FORM

CUSTOMER INFORMATION	
Customer Name:	Title: (Mr/Ms)
Customer Address:	
Mobile No.:	Email Address:
Policy No.:	Invoice No.:
Insurance Line:	Policy Period:
COMPLAINT INFORMATION	
Complaint Date:	Complaint Taken By:
Complaint Details:	
First Response Corrective Action:	
Suspected Cause:	
Corrective Action Person(s):	
Corrective Action Follow-up:	
What steps should be considered to avoid a repeat of the problem?	
Date:	

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 Name and Signature of Person completing this form

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 Date Accomplished