



COMPLAINTS PROTOCOL

PAYOUTS AND CLAIMS ADMINISTRATION

December 6, 2018

CCRIF SPC recognizes the need for transparency and fairness in its operations. This document sets out and establishes a protocol to be followed when a complaint is received from a policyholder. In this Protocol, “complaint” means any dissatisfaction with

- a payout calculated by the model or
- the manner in which CCRIF has carried out the claims administration process

The Complaints Protocol provides a process for receiving, recording, tracking and dealing with complaints which may arise if perceived losses after an event does not result in the expected level of payouts or if, in the claims administration process including matters related to the policy and event reports, CCRIF has allegedly acted or omitted to act resulting in

- i. mistakes or a lack of care
- ii. unreasonable delay
- iii. unprofessional behavior
- iv. bias and
- v. a lack of integrity

For the purposes of this Protocol, the following types of complaints are excluded¹:

- complaints in relation to the Board or Directors, staff or service providers
- complaints related to operations
- complaints disputes
- complaints not related to payouts or claims administration

Concerns or questions received verbally or in writing on payouts would be classified a query and the policyholder may request a Complementary Event Analysis. Concerns or questions received verbally or in writing on payouts would be classified a complaint only after completion of the Complementary Event Analysis.

All complaints should identify the duly authorized representative of the policyholder making the complaint. Anonymous complaints will not be accepted.

The complaint should provide all relevant particulars on the substance of the matter, together with relevant documents, where appropriate. CCRIF will seek to resolve complaints as soon as reasonably possible. Complaints will usually be resolved between 5 and 20 days depending on the nature of the complaint. An update will be provided within 14 days of receipt of the complaint should the issue not be resolved by then.

The Complaints Protocol gives CCRIF an opportunity to remedy shortcomings or resolve potential disputes related to the claims and claims administration process.

¹ Any party may file complaints of this nature by writing to the Chief Executive Officer



Procedure

- 1 The CCRIF website will include a section on *How to Make a Complaint*. Should a policyholder have a complaint an email should be sent to the attention of the CCRIF CEO to the email address complaints@ccrif.org. The subject line should state the topic of the complaint and include the country name.
- 2 The CCRIF Risk Management Specialist (RMS) will assign an identification number to the complaint and record details such as receipt date, information about the sender of the complaint (country, organization etc), type of complaint, issues to be addressed and status.
- 3 The email with the complaint will be acknowledged within 24 hours of receipt via email by the CCRIF Corporate Communications Manager. The Corporate Communications Manager will send the complainant details explaining how the complaints procedure works. In each case, the complainant will be advised that the fact that a complaint is under investigation does not constitute admission of any fault, wrong-doing or legal liability on behalf of CCRIF.
- 4 The response to the complaint will be drafted by the RMS and shared internally with the CCRIF CEO, CCRIF COO, CCRIF CRMO, RMS and Corporate Communications Manager for review.
- 5 The CCRIF CEO will approve all responses which include the approved response document, cover sheet and any supporting documents. The response for complaints related to claims administration will be issued by CCRIF within 5 days. Responses related to payouts will be issued within 5-20 days, depending on the nature of the analysis to be provided in the response. An update will be provided within 14 days of receipt of the complaint should the issue not be resolved by then. If a complaint is found to be justifiable, the response would advise the complainant in writing of what CCRIF proposes to do to remedy the matter, subject to its responsibilities and obligations as well as the governing law. If CCRIF concludes that a complaint is not justifiable, the response will explain the reasons in writing. If the complainant is still dissatisfied after being informed of the outcome of the investigation, the complainant's further remedies include a request for second investigation or seeking remedy under the relevant covenants of the Participation Agreement and/or Policy.
- 6 A Complaints Cover Sheet template is provided as part of this Protocol; the template will be completed by the CCRIF SPC RMS on a case by case basis.
- 7 The policyholder should confirm receipt of each response from CCRIF by email sent to complaints@ccrif.org and indicate if there are further issues or if all matters have been addressed.



- 8 The RMS will maintain a complaints log to record incoming complaints and track the client requests. It will include the
- Date of complaint
 - Source of complaint (name and contact information of member country representative)
 - Nature of the complaint [Payout or Claims Administration Process],
 - Specific details of the complaint,
 - How and when the complaint was resolved,
 - Any changes implemented as a result of the complaint and procedures to implement the changes required

The complaints log will be continually updated until all matters are resolved and signed off by the CCRIF CEO.

- 9 On a quarterly basis, the CEO would report to the Board on complaints submitted and the results of the findings. The report may include information on trends in complaints, lessons learned or any prospective legal action from complainants.



Complaints Cover Sheet

DAY MONTH, YEAR

The cover sheet below summarizes the complaint received by (appointed person) of (Ministry of Finance/Disaster Management Office) via email.

<i>CCRIF Segregated Portfolio</i>	
<i>Complaints Number</i>	«CountryCode»_Complaint_YYMMDD_XX
<i>Type of Complaint</i>	PAYOUT/CLAIMS ADMINISTRATION PROCESS
<i>Name of Event</i>	
<i>Beginning and End Date of Event</i>	
<i>Receipt Date of Complaint</i>	DAY MONTH YEAR
<i>Description of Complaint</i>	(Entered in bullet form.)