

PRIME INSURANCE LTD
COMPLAINTS HANDLING POLICY
MAY 2025

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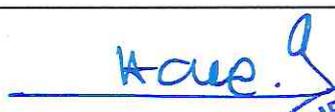
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Distribution List

Name
1. All Departmental heads and Directors
2. Franchises

Approval

This policy has been prepared in accordance with the Regulation N° 56/2022 of 27/10/2022 on Financial Service Consumer's Internal Complaints Handling and approved by the board of directors in its ordinary meeting held on 28./05./ 2025 and signed on its behalf by:

Names and Position	Signature
Col (Rtd) Eugne M. HAGUMA Chief Executive Officer	
Camille KARAMAGA Chairman of the Board of Directors	



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1. PURPOSE

To ensure that customer complaints received concerning Prime Insurance Ltd services and products are managed with impartiality and in a timely and cost-effective manner, without undue delay to ensure customer satisfaction.

2. SCOPE

This procedure applies to all complaints received concerning Prime Insurance services and products. It is applicable throughout the Prime Insurance quality management system.

3. PRINCIPLE RESPONSIBILITIES

3.1 Prime Insurance Board of Directors

The board of directors have the following responsibilities:

- a) Approving the policies and procedures governing complaints handling process;
- b) Exercise oversight on risks associated with complaints handling; and
- c) Receive and provide recommendations on regular internal complaints handling reports.

3.2 Prime Insurance Senior Management

The senior management has the following responsibilities:

- a) Makes complaints handling a priority for the institution;
- b) Identifies and allocates the resources needed for an effective and an efficient complaint handling process;
- c) Ensures the promotion of awareness of the complaints handling process and the need for a customer focus throughout the organization;
- d) Ensures that there is a process for rapid and effective notification to top management of any significant complaints; and
- e) Periodically reviews the complaints handling process to ensure that it is effectively and efficiently maintained and continually improved.

3.3 Head of Departments

The Heads of Departments have the following responsibilities:

- a) Ensures that complaints handling procedure is effectively implemented in their respective department;
- b) Transmit the received complaint to responsible staff for handling; and
- c) Follow up on communication of the action taken to address complaint to the complainant.

3.4 Customer Experience Manager

The Customer Experience Manager has the following responsibilities:

- a) Transmits the received complaint to the relevant Head of Department.
- b) Ensures that information about the complaints handling process is easily accessible;
- c) Ensures that complaints handling data are available for the senior management review;
- d) Establishes a process to perform the monitoring and evaluation of complaints handling process;
- e) Maintains the effective and efficient operation of the complaints handling process;
- f) Ensures that monitoring of the complaints handling process is undertaken and recorded; and
- g) Proposes recommendations for improvement.

3.5 Front Desk/customer facing staff

- a. The receptionist ensures recording of the received complaint on complaint handling form for further handling.
- b. The receptionist is also responsible of the following:
 - i. Behaves professionally when dealing with customers;
 - ii. Helps customers gain access to the complaint handling process;
 - iii. Knows complaint handling procedures well and comply with core values;
 - iv. Maintains interest in best practice in complaints handling; and
 - v. Treats customers in a courteous manner and promptly respond to their complaints or direct them.

3.5 ALL STAFF

It is the responsibility of any Prime Insurance staff to receive and transmit the received complaint to the receptionist.

4 GUIDING PRINCIPLES

4.1 Transparency

The complaints-handling process is communicated to customers, personnel and other relevant interested parties. Individual complainant is provided with adequate information about the handling of their complaint.

4.2 Accessibility

A complaints-handling process is easily accessible to all complainants. Information is made available on the details of making and resolving complaints. The complaints handling process and supporting information is easy to understand and use. The information is provided in clear language.

4.3 Responsiveness

Prime Insurance addresses the needs and expectations of customers with respect to complaints handling.

4.4 Objectivity

Each complaint is addressed in an equitable, objective and unbiased manner through the complaints -handling process.

4.5 Information integrity

Prime Insurance ensures that the information about its complaints handling is accurate and not misleading, and that data collected are relevant, correct, complete, meaningful and useful.

4.6 Timeliness

Complaints are handled as expeditiously as feasible given the nature of the complaint and of the process used.

4.7 Confidentiality

Personally identifiable information concerning the complainant are available where needed, but only for the purposes of addressing the complaint with in the Prime Insurance and are actively protected from disclosure, unless the customer or complainant expressly consents to its disclosure or disclosure is required by law.

4.8 Customer-focused approach

Prime Insurance adopt a customer-focused approach with respect to handling complaints and should be open to feedback.

4.9 Accountability

Prime Insurance establishes and maintains accountability for, and reporting on, the decisions and actions with respect to complaints handling.

4.10 Improvement

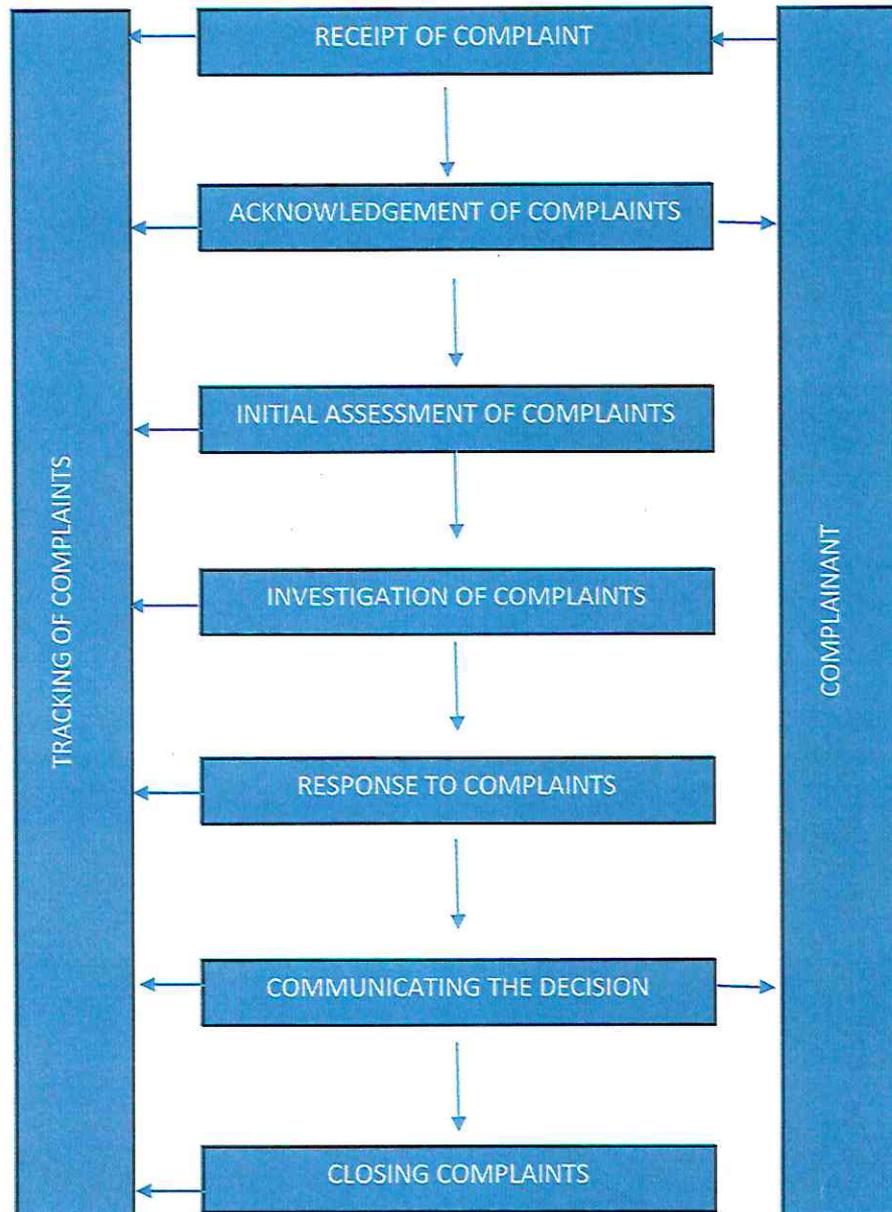
Increased effectiveness and efficiency of the complaints-handling process is a permanent objective of the Prime Insurance Ltd.

4.11 Competence

Prime Insurance ensures that its personnel have the personal attributes, skills, training, education and experience necessary to handle complaints.

5. COMPLAINTS HANDLING PROCEDURE DETAILS

5.1 Complaint Handling Flow Chart



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5.2 Receipt of complaints

5.2.1 Complaints are received through different channels including but not limited to phone, email, written and verbal. Customers can raise complaints using any of the following channels:

Phone: Call our customer service hotline at the number found in our customer service charter.

Email: Send an email to callcenter@prime.rw

Website: Submit a complaint via the online portal at www.prime.rw

In-person: Visit our office at MIC Building.

Mail: Send written complaints to info@prime.rw

5.2.2 All customer complaints shall be recorded by the receiving staff on complaint handling form.

5.2.3 The filled in complaint handling form shall be passed to the customer experience Manager.

5.2.4 The customer experience Manager forwards the received complaint to the relevant Head of Department for evaluation and handling.

5.3 Acknowledgement of complaints

Once the complaint is received, it is acknowledged promptly and not later than one working day, using appropriate means. Depending on the way it has been received, the acknowledgement is done as follow:

- a) For complaint submitted through a written letter, the acknowledgement shall bear the date, stamp, the name and the signature of the staff who received the complaint;
- b) For complaint submitted electronically, the Customer Experience Manager shall acknowledge it electronically;
- c) A complaint submitted in person shall be acknowledged by written receipt comprising of the complainant's name, details of the complaint, date the complaint was submitted, and any other relevant information. The acknowledgment receipt shall be signed and stamped; and

- d) In case of a complaint submitted through a phone call, the receiver of the complaint shall acknowledge it by sending a short message service to the complainant.

5.4 Initial assessment of complaints

5.4.1 The Customer Experience Manager gathers information necessary to evaluate the credibility of the complaint, its severity, complexity, impact, and the need and possibility of immediate action.

5.4.2 In the event where action needs to be taken, the Customer Experience Manager resolves the complaint and if necessary, forwards it to the appropriate department for further action which is dependent on the nature of the complaint.

5.5 Investigation of complaints

5.5.1 The Head of department appoints a staff/team who carries out a detailed investigation and records the findings on the appropriate section of complaints handling form.

5.5.2 The outcome of the investigation including the proposed response is communicated to the relevant heads of departments as to be handled appropriately.

5.5.3 When the outcome is out of the department control then it is oriented to the Customer Experience Manager and informs the management office for further action.

5.5.4 The customer is kept informed of the progress of the complaint handling process at every stage of the process by e-mail or SMS.

5.6 Response to the complaints

The Head of Department reviews and approves the response to the complaint including any corrections, corrective and/or preventive actions proposed by the staff/team as indicated on the complaints handling form.

5.7 Communicating the decision

The Customer Experience Manager ensures that the proposed decision is communicated to the complainant.

5.8 Closing complaints

5.8.1 When the complainant accepts the proposed decision or action, then it is carried out and recorded as completed action.

5.8.2 If the complainant rejects the proposed decision or action, then the complaint remains open and records are kept. The complainant is given the option to complain to a higher level which is the Prime Insurance CEO's office.

5.8.3 If the complainant is still not satisfied with the proposed decision or action, then the complainant can log the complaint to the other relevant Authorities.

5.8.4 The Customer Experience Manager continues to monitor the progress of the complaint until all reasonable internal and external options are exhausted or the complainant is satisfied.

5.8.5 The Customer Experience Manager ensures that the complaint has been closed and requests for feedback from the complainant on the client complaint handling process in order to evaluate its effectiveness and complainant satisfaction.

5.8.6 Where possible, the Customer Experience Manager gives a formal notice to the complainant at the end of the complaint handling process.

5.8.7 Turnaround time for resolving complaints varies depending on the nature of the complaint but shall not exceed **15** days from the day of receipt, with a progress notification to the complainant at least every five **(5)** days.

5.9 Tracking of complaints

5.9.1 The Customer Experience Manager ensures that complaints are tracked and records kept in the appropriate sections of complaints handling form and filed in the appropriate complaints register.

5.9.2 A complaints handling form is used to follow up on the timely and effective resolution of complaints.

5.9.3 The Customer Experience Manager ensures update of the complaints records as appropriate using the information in the filled complaint handling form.

5.10 Analysis and evaluation of complaints

All complaints shall be classified and then analyzed on quarterly basis to identify systematic, recurring and single incident problems and trends, to help eliminate the underlying causes of complaints, and to identify opportunities for improvement or changes in processes, products and services offered. The report shall be presented to the management on regular basis.

6. POLICY REVIEW

This policy shall be reviewed every three years or when there is change in laws to ensure that it remains relevant to the organization's objectives and strategic intent.

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