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## **INTERNAL RULES OF PENSION ASSURANCE COMPANY DOVERIE AD FOR RECEIVING, HANDLING, AND RESPONDING TO COMPLAINTS**

### Section I

#### General

##### *Purpose*

Article 1. (1) These Rules shall govern:

1. the procedure for lodging complaints;
2. the procedure for receiving and registering complaints;
3. the procedure for allocating registered complaints and for carrying out verification and collection of information;
4. the cooperation and coordination between the different structural units involved in the complaint handling process;
5. the procedure for preparing and sending the response to the complaint;
6. corrective measures and actions concerning a complaint received;
7. control of the process of receiving, reviewing, and responding to complaints.

(2) A complaint, within the meaning of these Rules, is any oral or written complaint, expression of disagreement or dissatisfaction, suggestion or remark of a client or his/her heir regarding the products and services provided by Pension Assurance Company Doverie AD, including those related to the conduct of its employees, insurance intermediaries or other persons with whom the company has a contract.

(3) The scope of these rules also includes those provided for in the regulations for the organization and operation of the funds for supplementary pension insurance managed by Pension Assurance Company Doverie AD:

1. complaints against decisions of the Managing Board and acts of the company representatives;
2. whistleblowing against insurance intermediaries or company employees.

(4) These Rules shall also apply to written complaints received by Pension Assurance Company Doverie AD through supervisory or other administrative and government authorities and organizations.

##### *Objective*

Article 2. (1) The main purpose of these Rules is to resolve fairly and impartially complaints from clients of Pension Assurance Company Doverie AD, within the pre-set deadlines for response.

(2) While resolving disputes arising in connection with a complaint received, the aim is to be prompt and objective in making decisions and drafting the response, to prevent litigation, to protect the company's reputation, and to analyze and to address the causes that led to complaints.

(3) Additional objectives of the Rules are:

1. To establish a clear and objective procedure for receiving, registering, allocating, examining, and responding to complaints within the established deadlines;



2. to regulate the coordination and subordination relations between the different structural units in the company in the handling of complaints, as well as the sequence of actions carried out by them;
3. To ensure compliance with the principles of lawfulness, transparency, objectivity, and confidentiality, and to avoid conflicts of interest in the course of administration of complaints;
4. To improve the quality of services and customer care, based on periodic and detailed analysis of the complaints received.

#### *Informing customers about these Rules*

Article 3. These Rules are published on the website of Pension Assurance Company Doverie AD and information on their content shall be provided to clients upon their request, at the company's office, or in writing in response to a request received from them.

#### *Classification of complaints*

Article 4. To improve existing practices, effectively collect and analyse information, monitor complaints, and control the related activity, the following categories of complaints shall be distinguished according to their subject matter:

1. complaints concerning poor customer service or the quality of the products and services offered by the company, including the signals referred to in Article 1, paragraph 3, item 2;
2. complaints under article 1, paragraph 3, item 1;
3. complaints under Ordinance No. 3 of 24.09.2003 of the Financial Supervision Commission or Ordinance N-33 of 19.09.2006 of the FSC;
4. Complaints for unpaid contributions to the individual accounts of the insured persons in the funds for additional compulsory pension insurance managed by Pension Assurance Company Doverie AD.

#### *Handling of complaints*

Article 5. (1) All complaints received by Pension Assurance Company Doverie AD shall be processed centrally by the Customer Correspondence Department, Complaints Sector, or another structural unit which, due to the specific subject of the complaint, is assigned to examine it and prepare a response.

(2) All employees and structural units of Pension Assurance Company Doverie AD shall assist the unit assigned to handle a complaint within the scope of their functions and competence.

(3) The centralised handling of complaints is intended to ensure the efficient collection of information and preparation of a response, monitoring of their content and control of related activity.

## Section II

### **Registration, handling and response to complaints received**

#### *Submission of complaints*

Article 6. Complaints addressed to Pension Assurance Company Doverie may be submitted:

1. verbally - in the company office or meetings, or customer service, outside the office;
2. by phone;
3. in writing:
  - a) by letter, to the address of the head office of Pension Assurance Company Doverie AD;
  - b) by email to: [head@poc-doverie.bg](mailto:head@poc-doverie.bg);
  - c) through the special application on the Company's website;
  - d) in the offices of Pension Assurance Company Doverie AD.

#### *Registration of complaints*

Article 7. (1) Complaints received at Pension Assurance Company Doverie AD under Article 6, item 3, letter "a" - "c" shall be registered in the Company's filing system, in a separate register, as specified in the Regulation on document flow of Pension Assurance Company Doverie AD.

(2) Complaints received at Pension Assurance Company Doverie AD under Article 6, item 3, 6 (d) shall be registered with an incoming number in the respective office and shall be sent according to the established procedure to the headquarters, where, after their receipt, they shall be registered in accordance with paragraph 1.

(3) Upon receipt of a complaint under Article 6, item 1 or 2, the employees of Pension Assurance Company Doverie AD shall, with care and courtesy, within the scope of their responsibilities, make their best to resolve the complaint within the conversation, as well as shall inform the client about the procedure and the way to submit a written complaint if he/she is not satisfied with the employee's answers or needs additional information.

(4) Complaints under paragraph 3 shall be recorded in the information system, noting the details of the customer with whom the conversation was held, a brief description of the problem, the actions of the employee, and the result - whether the problem was solved or not.

#### *Review of complaints*

Article 8. (1) Complaints registered under Article 7, paragraph 1 and 2 shall be forwarded to the Chairperson of the Managing Board or the Executive director, who shall assign them to the appropriate structural unit based on its competence.

(2) Upon receipt of the complaint in the structural unit to which it has been assigned, the head of the unit shall assign a specific employee(s) to investigate the statements in the complaint, taking note of all the facts and circumstances of the complainant's previous communication with Pension Assurance Company Doverie AD and the documents available to the company about him/her.

(3) If, in the course of the investigation referred to in paragraph 2, the employee handling the complaint finds out that additional information or documents are necessary to clarify the complaints set out therein, he/she may, in agreement with his immediate superior, request them from the complainant, either by telephone or in writing, in the manner in which the complaint was received or the complainant has indicated that he wishes the reply to be sent to him/her.

(4) In the cases referred to in paragraph 3, if the requested additional information or documents are not provided, the response to the complaint shall be prepared on the basis of the facts and documents available to Pension Assurance Company Doverie AD in the term under article 12.

(5) Where the issue raised in the complaint is very complicated or concerns the activities of different structural units, the employee handling the complaint shall, in consultation with their line manager, provide a copy of the complaint to those units which, within the limits of their competence and functions, shall assist in resolving the problem raised and in preparing the reply.

(6) In the cases referred to in paragraph 5, the coordination of activities between the structural units shall be carried out by the employee handling the complaint in such a way as to ensure maximum clarification of the issue raised in the complaint and compliance with the term specified in Article 12.

(7) The head of the structural unit to which the complaint has been assigned shall be responsible for monitoring and keeping the terms for responding and for avoiding conflicts of interest by organising, monitoring and controlling the complaint handling and response process.

#### *Response to complaints*

Article 9. Upon completion of the investigation and on the basis of the facts and circumstances established, the employee handling the complaint shall draft a response to the complaint and submit it to their line manager for approval.

(2) In the cases referred to in Article 8, paragraph 5, the draft response shall also be coordinated with the structural units which assisted in the review of the complaint and the drafting of the response.

(3) The prepared and agreed response shall be submitted to the representatives of Pension Assurance Company Doverie AD for signature.

(4) When the complaint is addressed to the Managing Board of Pension Assurance Company Doverie AD, the draft response shall be submitted for consideration at its meeting by the Chairperson, who shall sign the reply after the Managing Board has approved its content.

#### *Content of responses*

Article 10. (1) Responses to complaints must be clear and contain specific reasons and explanations, including the position of Pension Assurance Company Doverie AD, as well as information on further options for development and resolution of the problem subject to the complaint.

(2) Where Pension Assurance Company Doverie AD is not competent to consider a complaint addressed to it, it shall be forwarded by the Company to the competent authority or institution, of which the complainant shall be expressly notified.

#### *Sending the responses*

Article 11. The prepared and signed response to a complaint shall be drawn up in accordance with the established rules of the Pension Assurance Company Doverie AD and shall be sent:

1. By mail:

a) where the complaint has been received by post or the complainant has expressly indicated in the complaint that he/she wishes the response to be sent to a designated address;

b) where the complaint has been received under Article 6, item 3, 6, "b" or "c", but in view of the security of the information contained in the response, it should not be sent by email.

2. By email where the complaint has been received under Article 6, item 3, 6, "b" or "c", or the complainant has expressly indicated in the complaint that he/she wishes the response to be sent to a designated email address.

3. At the office of Pension Assurance Company Doverie AD, when the complainant has explicitly stated in the complaint that he wishes to receive the answer at the company's office.

#### *Terms*

Article 12. (1) The term, which includes the examination, the preparation of a response and the sending of the response to the complaints received by the Pension Assurance Company Doverie AD shall be 30 days from the date of their registration under Article 7, paragraph 1 or their filing under Article 7, paragraph 2.

(2) For complaints received from supervisory or other administrative and government authorities and organizations the term specified in the relevant complaint shall apply instead of that under paragraph 1 but.

### **Section III**

#### **Control and analysis**

##### *Control*

Article 13. The overall control of the activity related to the administration, examination and response to the complaints received in the Pension Assurance Company Doverie AD shall be carried out by the Specialized Internal Control Unit.

##### *Analysis of the complaints*

Article 14. (1) Pension Assurance Company Doverie AD shall carry out a systematic (quantitative and qualitative) and comparative analysis of complaints, the statistical information shall be analyzed and compared with that of complaints from previous periods in order to achieve:

1. Improvement of the offered products and services;

2. high quality of customer service;

3. Improvement of the rules and procedures for handling complaints.

(2) The analysis under paragraph 1 may also contain proposals for appropriate corrective measures and actions, as well as a summary of the results of measures taken in this respect in previous years.

(3) The analysis under paragraph 1 shall be carried out by assignment of the representatives of Pension Assurance Company Doverie AD or upon the initiative of the Specialized Internal Control Unit in connection with its control activities.