



THE BF&M GROUP OF COMPANIES

# Complaints Handling Policy

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January 2023

**BF&M Limited**  
BF&M Insurance Building  
112 Pitts Bay Road  
Pembroke HM 08  
Bermuda

**Island Heritage Insurance Company, Ltd.**  
Island Heritage House  
128 Lawrence Blvd.  
P.O. Box 2501  
Grand Cayman  
KY1-1104  
Cayman Islands

## Introduction

BF&M Limited (“**BF&M**”) is the parent company of the BF&M group of companies (the “**BF&M Group**”), which includes Island Heritage Insurance Company Ltd. The BF&M Group operates directly and through its subsidiaries and/or agents in 15 jurisdictions.

The BF&M Group seeks to maintain and enhance our reputation of providing high quality products and service. We value Complaints as they assist us to improve our products and customer service. We remain committed to being responsive to the needs and concerns of our customers or potential customers and to resolving their Complaint as quickly, effectively, and fairly as possible and to ensuring that our internal process is simple and equitable to facilitate a resolution quickly.

This Complaints Handling Policy (“**Policy**”) has been designed to provide guidance on the manner in which the BF&M Group receives and manages any Complaint which it receives. We are committed to being consistent, fair and impartial when handling Complaints.

## Purpose and scope of policy

This Policy provides guidelines which are aimed at ensuring that the following objectives are met:

- There is a clear and fair procedure for any customer who wishes to make a Complaint about BF&M or its group of companies, our activities, our insurance solutions, our customer service or about our employees and/or contractors;
- Making a Complaint is a simple process, following a well-documented, easily understood procedure;
- Everyone working with or for us knows how to handle Complaints made by our customers;
- All Complaints are handled in a timely manner, equally and fairly; and
- We learn from Complaints to improve our service and avoid situations being repeated in the future.

## Regulatory obligations

This Policy is based on regulatory guidance issued throughout our operating jurisdictions, which applies to the BF&M’s Group Conduct both in Bermuda and abroad and includes but is not limited to:

- **BF&M Limited:** pursuant to the Insurance Code of Conduct (Revised) issued by the Bermuda Monetary Authority (“**BMA**”), as it is registered as an Insurer with the BMA; and
- **Island Heritage Insurance Company, Ltd. (“IHIC”):** pursuant to the Cayman Island’s Monetary Authority (“**CIMA**”) Statement of Guidance on Insurers, Agents, and Brokers Market Conduct, as it is registered as an Insurer with CIMA.

All remaining BF&M group companies are expected to apply and enforce the same standards as set out in this Policy and any other policy relevant in conjunction with the handling of Complaints (e.g. Anti-Bribery Policy).

## Customer complaints

### How can a Complaint be made?

When there is dissatisfaction with the service provided by Employees or Third Parties of the BF&M Group, the following methods are available for a Complaint to be lodged:

- By completing a feedback form on our website: [BF&M Customer Feedback Form](#) / [Island Heritage Customer Feedback Form](#) (example can be found at Appendix A);
- By telephoning BF&M at +1 441 295 5566, or Island Heritage at +1 345 949 7280;
- By emailing our Group Complaints Officer at [complaints@bfm.bm](mailto:complaints@bfm.bm); or
- In person by speaking to any of our customer service team members.

### What information is needed to investigate a Complaint?

When investigating a Complaint, we rely on all information provided by you and together with any information that the BF&M Group may already be holding. To help investigate the Complaint quickly and efficiently, the Complaint should include the following information:

- Your full name, address, telephone number and email address. All formal communication related to your Complaint will be via email or the preferred contact method.
- If you are making a Complaint on behalf of someone else, please include that person's name and contact details, as well as your own.
- If you are making a Complaint about a particular transaction, include the Customer Reference Number (Policy Number/Quote Number/Claim Number/Other Reference).
- If you are making a Complaint about an Employee or contractor, include the name and, where appropriate, position of that Employee or contractor.
- Full details of your Complaint, including details of all applicable times, dates, events, and people involved.
- Any supporting documents or other evidence you feel is applicable or relevant in support of your Complaint.
- Details of what you would like us to do to resolve your Complaint.
- **You should understand that whilst we will make every reasonable effort to accommodate such requests, we are not bound to take any action beyond our contractual or legal obligations.**

## Confidentiality

When a Complaint is received regarding an Employee or Third- Party, this will be treated confidentially, impartially, and equally (giving equal treatment to all people).

## Complaints under investigation by a regulator or law enforcement agency

If a Complaint is being investigated by a law enforcement agency or consumer protector regulator, we may cease to take further action in relation to a Complaint pending finalization of their investigation.

## Our Complaint escalation process

<b>TIER 1 First Contact Resolution</b>	Our Employees and Third-Parties are empowered to resolve Complaints, wherever possible, at first contact.
<b>TIER 2 Business Head</b>	If you are not satisfied with our first contact response, you can request for the Complaint to be escalated. The appropriate Business Head or the Group Complaints Officer will then review the Complaint and provide you with a further response.

# Appendix A: Customer feedback form




## Customer Feedback Form

BF&M and Island Heritage are members of the BF&M group of companies. Within our Group, we do our utmost to deliver professional, efficient, and helpful service. If we fall short, we value knowing about it so we can provide you with the service you deserve and improve our process going forward. For additional information, view our [Complaints Handling Policy](#).

Please outline the details of your experience in the short form below and we will make every effort to respond promptly.

<b>Feedback relates to:</b>	BF&M
<b>Full name:</b>	<input type="text"/>
<b>Company name (if relevant):</b>	<input type="text"/>
<b>Policy number (if relevant):</b>	<input type="text"/>
<b>Date of birth (DD-MM-YYYY):</b>	<input type="text"/>
<b>Email address:</b>	<input type="text"/>
<b>Phone number:</b>	<input type="text"/>
<b>Product or service:</b>	<input type="text" value="---Please Select---"/>
<b>Relationship with BF&amp;M:</b>	<input type="text" value="---Please Select---"/>
<b>Nature of feedback:</b>	<input type="text" value="---Please Select---"/>
<b>Nature of issue:</b>	<input type="text" value="---Please Select---"/>
<b>Additional details:</b>	<input type="text"/>

Enter security code:  

Please enter the value in the box for verification

**Submit**

## Appendix B: Definitions

### Associated Person

Means any individual or corporate entity associated with the BF&M Group who performs functions for and on behalf of, the BF&M Group, including, but not limited to, directors, casual workers, interns, contractors, consultants, agents, suppliers, and Third-Party representatives.

### Complainant

Means the person lodging the Complaint of dissatisfaction, being a prospective or existing policyholder or customer of the BF&M Group. Whilst we do respond to Complaints from Third Parties (not customers/ policyholders), they do not fall under this Policy.

### Complaint

Means an expression of dissatisfaction by a customer relating to service provided by the BF&M Group, an Employee, Associated Person or Third Party, where a response or resolution is explicitly or implicitly expected. A response or resolution is '*explicitly expected*' if the Complainant clearly requests it. It is '*implicitly expected*' that the Complainant raise the Complaint in a way that implies they reasonably expect the BF&M Group to respond. A Complaint can be made in writing or orally.

### Group Complaints Officer

Ms. Jennifer Woods

Email: [complaints@bfm.bm](mailto:complaints@bfm.bm)

### Employees

Means staff, management, officers, agents, consultants, and temporary employees of the BF&M Group, without exception.

### Third Parties/ Party

Shall mean any individual or entity (vendor, service provider agent, etc.) who does not have a direct connection with a legal transaction, but who might be affected.