JSC Insurance Company Unison

PROCEDURE FOR RECEIPT AND REVIEW

UNISON
INSURANCE COMPANY

APPROVED
by Order No. ___ dated ___ _________ 2026
of the Director of JSC Insurance Company Unison,
vested with full management and
representation authority

JSC INSURANCE COMPANY UNISON

PROCEDURE FOR RECEIPT AND REVIEW

Legal Basis

This Procedure has been developed in accordance with the "Instruction on the Protection of Consumer Rights in the Provision of Insurance Services by an Insurer", approved by Order No. 18 dated 3 April 2017 of the Head of the Insurance State Supervision Service of Georgia.

1. PURPOSE, SCOPE AND KEY PRINCIPLES

1.1 The purpose of this Procedure is to establish a uniform process for the accessible, impartial, timely and reasoned review of complaints raised by consumers in connection with insurance services.
1.2 This Procedure applies to individuals and legal entities receiving insurance services - policyholders, insured persons and beneficiaries - as well as their authorized representatives.
1.3 . The review of complaints is coordinated by an independent structural unit/person designated by the Company as responsible for complaints management (the "Responsible Function"). Relevant specialist units cooperate with the Responsible Function when examining a complaint on its merits.

- Accessibility - the consumer may submit a complaint through any convenient and available channel;
- Impartiality - the review is based on facts, documents, the contract and applicable rules;
- Timeliness - the Company monitors review deadlines and provides the final response within the prescribed time limit;
- Clear communication - the response must be clear, specific and reasoned;
- Confidentiality - personal, medical and other protected information is processed only to the extent necessary.

2. WHAT IS CONSIDERED A COMPLAINT

2.1 A complaint is a dissatisfaction/request expressed by a consumer in connection with insurance services which, by its substance, falls within one or more of the categories listed below.

Category	Content
Category 1	A request for full or partial review, amendment or additional justification of a decision already made regarding insurance indemnity.
Category 2	A deficiency or dissatisfaction related to the service process, including the hotline, an employee, representative, partner or the service process itself.
Category 3	A request related to the provision, delayed provision or non-provision of information or a document.
Category 3	Any other contractual request that does not fall within the above categories and is not an initial request for payment of insurance indemnity.

2.2 If a consumer's communication contains only a general question or a request for clarification or assistance and does not express dissatisfaction/a dispute, it shall be handled through the relevant service channel rather than under the complaint procedure.

2.3 The obligation to review a complaint under this Procedure does not apply to a complaint already reviewed in relation to the same request of the same consumer, or to other exceptional cases prescribed by law.

3. COMPLAINT SUBMISSION CHANNELS

A consumer may submit a complaint through the channels listed below. Any complaint received by the Company, regardless of the channel through which it is received, is forwarded to the responsible person and recorded in the unified register.

Channel	How To Submit
Website / electronic form	Complete the complaint form and upload any available supporting materials.
Email	complaints@unison.ge or shenikhma@unison.ge
Hotline	(+995 32) 2 991 991 - the operator records the dissatisfaction and forwards it for review.
Office / branch	A written statement or the standard complaint form.
Social media / online chat	Dissatisfaction received through an official channel is converted into an official record.
Sales manager / agent / broker	The received expression of dissatisfaction is forwarded to the responsible person for registration and review.
Postal mail / official letter	A statement sent to the Company's official address is registered and forwarded to the responsible person.

4. INFORMATION THE CONSUMER SHOULD PROVIDE

A legally drafted text is not required for registration of a complaint. The consumer should provide enough information to enable prompt identification and examination of the matter.

Information	Description
Identification	Full name / organization name; identification details where necessary.
Case reference	Policy, contract, application, claim or other relevant case number.
Description of the matter	What happened, when it happened, whom the consumer communicated with, and what the dissatisfaction concerns.
Desired outcome	What decision, clarification, correction or other action the consumer is requesting.
Contact information	Telephone, email and preferred method of receiving the response.
Supporting materials	Any available letter, document, photograph, receipt or other material.
Representation	If the submission is made on behalf of another person - a document confirming the relevant authority.

Incomplete Information

Providing incomplete information does not automatically constitute grounds for refusing to accept a complaint. If necessary, the Company will contact the consumer to obtain additional information.

5. REGISTRATION AND RECORD-KEEPING

5.1 A received complaint is entered into the Company's unified record/register and assigned an identifier or case number.

5.2 The record shall include at least: the consumer's identification data to the extent necessary, the date and channel of receipt of the complaint, the nature/category of the complaint, the related policy or case (if any), the content of the Company's response, measures taken and the final outcome.

5.3 Records shall be retained for the document retention period prescribed by law and updated as the review progresses.

6. COMPLAINT REVIEW PROCESS AND TIME LIMITS

Stage	What We Do	Time Limit
Receipt and registration	The complaint is recorded in the unified register and forwarded to the responsible person.	As soon as possible after receipt
Classification	It is determined whether the submission constitutes a complaint and which category it falls under.	At the start of the review
Fact-finding	The contract/policy, case materials, communications, system records and other evidence are reviewed.	Depending on the complexity of the case
Formulation of the position	Relevant specialists and the Responsible Function assess the factual and legal circumstances.	Within the overall review period
Final response	The consumer is sent a reasoned decision and, where possible, proposed terms for resolving the matter.	No later than 30 calendar days

Final Deadline

The outcome of reviewing a complaint submitted in writing shall be communicated to the consumer in paper and/or electronic form, in accordance with the form in which the complaint was received or another form agreed by the parties, no later than 30 calendar days from receipt of the complaint, unless a shorter period is prescribed by law.

7. CONTENT OF THE FINAL RESPONSE AND POSSIBLE OUTCOMES

The final response must be reasoned and specific. Depending on the circumstances of the case, it may include:?

- a brief summary of the consumer's request;
- a reference to the key facts established and documents reviewed;
- the Company's assessment and decision;
- factual, contractual and, where necessary, legal reasoning;
- information on the possibility of obtaining additional information or further review.

Outcome	What It Means
Full satisfaction	The Company agrees with the consumer's request and determines the appropriate action.
Partial satisfaction	The request is considered justified in part; the relevant part is clearly explained in the response.
Reasoned refusal	The request is not satisfied; the response states the factual and contractual/legal grounds.
Correction / alternative resolution	Data or process may be corrected, additional service may be provided, the matter may be reconsidered, or another practical solution may be offered.

8. ACCESS TO CASE MATERIALS AND INFORMATION PROTECTION

8.1 The consumer has the right to request information and case materials related to their complaint to the extent that disclosure is permitted under applicable law, taking into account confidentiality and personal data protection requirements.

8.2 The requested materials shall be provided to the consumer within a reasonable period, generally no later than 10 business days from receipt of the request. If locating/processing the materials objectively requires more time, the consumer shall be informed of the reason and the expected delivery date.

8.3 Personal, medical, commercial or other protected information of a third party may be redacted or withheld to the extent that its disclosure is legally prohibited.

8.4 Within the Company, access to case materials is limited to persons who require such information for the purposes of receiving, examining, resolving or controlling the complaint, or for reporting required by law.

9. ADDITIONAL CLARIFICATION AND THE SUPERVISION SERVICE

9.1 The consumer may request additional clarification from the Company regarding the response received.

9.2 Use of the Company's internal complaint review procedure does not restrict the consumer's statutory right to apply to the Insurance State Supervision Service of Georgia or another competent authority, a court, or any other lawful dispute resolution mechanism.

9.3 Current contact information for the Supervision Service is available to consumers on the Service's official website - insurance.gov.ge.

Personal data will be processed for the purposes of receiving the complaint, identification, examination, providing a response and fulfilling obligations prescribed by law, in accordance with the Company's Personal Data Protection Policy.

Contact us: complaints@unison.ge • shenikhma@unison.ge • (+995 32) 2 991 991