



**Complaints Report Summary  
IVASS Regulation 24/2008  
Year 2021**

**24<sup>th</sup> February 2022**

## Executive Summary

This report on the management of the complaints received during the year 2021, has been performed by Mediolanum International Life DAC in accordance with ISVAP Regulation no. 24/2008 (hereinafter, also “the Regulation”).

IVASS Provision no. 97/2020 modified the Regulation no. 24 IVASS 2008, with effect starting from 31<sup>st</sup> March 2021. The main change is the introduction of the article comma 4.bis, which requires that the Complaints Report should also provide information on the complaints received by the Company’s Distributor, i.e., Banca Mediolanum.

Those complaints are related to the behaviour of the Sales Network in the distribution activities of the Company's products (Company Function “Commercial”).

### Complaints received as of 31 December 2021

During the year 2021, the Company received thirty-five (35) written complaints all of which were classified as “processable<sup>1</sup>”. The complaints received by the Company were twenty-seven (27) and the complaints received by the Distributor, Banca Mediolanum, were eight (8)<sup>2</sup>.

As at the end of the year, out of thirty-five (35) “processable” complaints, twenty-eight (28) were “rejected<sup>3</sup>”, four (4) were “accepted<sup>4</sup>” and three (3) are under investigation.

During the year, no complaint was settled<sup>5</sup>.

Processable Complaints received in 2021	35			
of which closed in 2021	32			
of which are under investigation as at 31/12/2021	3			
		<b>Outcome</b>	<b>Number Complaints</b>	<b>% on processable Complaints</b>
		Rejected	28	88%
		Accepted	4	13%
		Transacted	0	0%

The average days to process the complaints were twenty-nine (29) days<sup>6</sup>, considering both the complaints received directly by the Company and by the Distributor.

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1. Processable complaints: complaints which, although with a generic content, have the essential elements to be managed by the undertaking.  
 2. The period considered for the complaints received by the Distributor is 31/03/2021 – 31/12/2021  
 3. Rejected: the undertaking resolves the complaint in a negative way for the complainant and rejects the requests.  
 4. Accepted: the undertaking resolves the complaint in a positive way for the complainant by fully accepting the reasons or the point of view.  
 5. Settled: the undertaking and the complainant find an agreement. The undertaking resolves the complaint in a positive way for the complainant, but not at the same conditions requested initially by the complainant  
 6. Calculated by summing the days between the date of receipt and that of processing and dividing by the number of complaints received and closed. The complaints considered in this calculation includes complaints received directly by the Company and by the Distributor.

The average days to process the complaints received directly by MIL were twenty-seven (27) days<sup>7</sup> compared with maximum period of forty-five (45) days as consider by the art.8 of the Regulation. This figure has increased slightly compared with the previous year when the average days was equal to twenty-six (26) days.

Moreover, during the year ended 2021, no complaint was handled for a period greater than 45 days.

The average days to process the complaints received by the distributor were forty (40) days<sup>7</sup> compared with maximum period of sixty (60) days.

Moreover, in the period from 31<sup>st</sup> March until 31<sup>st</sup> December 2021, no complaint was handled for a period greater than 60 days<sup>9</sup>.

As at the end of the year, the “processable” complaints received by the Company, thirty-five (35), have been increased compared to the same period of the previous year (2020) when the Company received thirty-four (34) “processable” complaints.

The table below shows the “processable” complaints based on the Company area.

Company Area	Number of processable complaints	Weight %
Administrative <sup>8</sup>	5	14%
Commercial <sup>9</sup>	8	23%
Legal <sup>10</sup>	3	9%
Settlement <sup>11</sup>	19	54%
<b>Total</b>	<b>35</b>	<b>100%</b>

During the year 2021 ten (10) complaints were reopened<sup>12</sup>, compared to eight (8) complaints reopened in 2020. Out of ten (10) “reopened” complaints, eight (8) were “rejected” two (2) are “under investigation”.

7. Calculated by summing the days between the date of receipt and that of processing and dividing by the number of complaints received and closed.

8. Complaints about organisational management, the timing and submission procedures of contractual information, the certificate of claims experience and other required information, etc.

9. The Commercial function represents the complaints received by the Distributor in the period 31/03/2021 – 31/12/2021

10. Complaints about the pre-contractual information note, interpretation and application of clauses of the insurance contract, their clarity, comprehensibility, transparency.

11. Complaints concerning the conduct of claim adjusters, loss adjusters, call centres, claims settlement delays and failures in life and non-life business and anything else concerns the management of claims or settlement of insurance benefits.

12. In the event that the complainants submit a further complaint, not considering the response received in the first instance satisfactory, the reopening of the case is carried out and the connection is maintained with the previous complaint.