Complaints Handling Procedure – Italian Complaints

StarStone Insurance SE ("StarStone") makes every effort to deliver the highest quality products and to provide the best possible service to its customers. We understand that despite our commitment, on occasion, mistakes are made – we may fail to meet our own standards and the expectations of the customers using our services or otherwise coming into contact with StarStone. If you are not satisfied, you may submit a complaint as follows.

Definition of complaint

A complaint is any written statement of dissatisfaction with StarStone regarding an insurance contract or service brought by the policyholder, beneficiaries or aggrieved third parties. Requests for information or clarification, claims for damages, or requests for contract enforcement are not considered complaints.

How to submit a complaint

If you wish to make a complaint to StarStone, you may do so in writing at any time by using StarStone's contact details below:

- By email: complaints@enstargroup.com (preferred)
- By post: Complaints Team c/o Operations Department, 12th Floor, 70 Mark Lane, London, United Kingdom EC3R 7NQ

The aim of this procedure is to settle the complaint fairly and as quickly as possible. We will use our best endeavours to comply with the timeframes set out below.

StarStone is a member of Enstar Group. A complaint received by StarStone will be allocated to an appropriate person in the operations department in Enstar Group to carry out an independent review of the justification of the complaint.

Please note that communications may be sent to you by StarStone or by StarStone's administrator in Italy, Crawford & Company Italia S.R.L. ("Crawford"). Please note that Crawford does not process or manage complaints received by StarStone. Crawford merely provides translation and administrative services to StarStone and therefore may send communications to you on StarStone and Enstar's instructions.

To help us to quickly and fully investigate your complaint, please provide us with the following information:

- your full name, contact details (email, phone number and postal address), and number of your identification document;
- in what capacity you are making the complaint: as a policyholder, beneficiary, or third party;
- policy number and/or claim reference number (if applicable);
- type of insurance product and date of loss (if applicable);
- details of your complaint;
- details of who you purchased your insurance from/through; and
- feedback on how you would like your complaint resolved.

Acknowledgment

Complaints will be acknowledged in writing by StarStone or by Crawford no later than 10 business days after receipt. That acknowledgement will include a copy of this complaint procedure.

StarStone is entitled not to admit the complaint if the required information is not delivered by the complainant.

Response

StarStone will provide a final written response within 45 days from receipt of the complaint, as required by applicable regulation.

Complaints to Institute for the Supervision of Insurance (IVASS)

If you are not satisfied with the outcome of the complaint or if you do not receive a response within the abovementioned timeframe, you may submit a complaint to IVASS (the Italian Insurance Supervisory Authority), by using the dedicated form available on the IVASS website at the web address https://www.ivass.it/consumatori/reclami/index.html and attaching the documentation relating to the complaint handled by StarStone. In these cases the complaint must include:

- name, surname, and address of the complainant, with telephone number if available;
- identification of the person or persons whose actions are the subject of the complaint;
- a brief description of the reason for the complaint;
- a copy of the complaint submitted to the insurance company (or intermediary) and any response provided by the latter;
- any document useful for describing the circumstances in greater detail.

Further information is available on the IVASS website at the abovementioned web address.

Alternative Dispute Resolution (ADR)

In case of rejection, partial acceptance, or absence of response to your complaint, you may also resort to alternative dispute resolution systems, such as:

- the Insurance Arbitrator (*Arbitro Assicurativo*), the out-of-court dispute resolution system established at IVASS and governed by Decree of the Minister of Enterprise and Made in Italy No. 215 of 6 November 2024, to which policyholders, insured persons, beneficiaries and injured third parties may submit a complaint, for disputes concerning insurance contracts. The entire procedure takes place online on the AAS Portal, a simple and interactive tool that guides you through the appeal process. You can file an appeal on your own and you do not need the assistance of a lawyer. However, it is always possible to file an appeal through another person, to whom you can grant power of attorney, or through a consumer association. More detailed information on how to apply and the rules of the Insurance Arbitrator procedure are available at the official website www.arbitroassicurativo.it;
- mediation procedures under Legislative Decree No. 28/2010, which are mandatory as a condition precedent for proceeding with insurance disputes (excluding those relating to compensation for damage caused by vehicles and crafts), which can be initiated by submitting an application to a Mediation Body from among those listed by the Italian Ministry of Justice, available at www.giustizia.it;
- assisted negotiation (Law No. 162 of November 10, 2014), which can be initiated by requesting your lawyer to contact StarStone;
- other out-of-court settlement systems, including those of a conventional nature, and
- the FIN-NET network for cross-border disputes.