

# CATIC Title Insurance Company Complaint Handling Procedures

We are committed to providing high-quality services to all of our insureds. As part of that high level of service we are committed to handling complaints in a fair and impartial manner. Every Agent Service Representative is informed of CATIC Title Insurance Company's Complaint Handling Procedures and they, in turn, share those procedures with our agents. We define a complaint as any written communication primarily expressing a grievance whether received from an insured or any Insurance Department. Not every contact by a policyholder or claimant questioning some action by CATIC Title Insurance Company will constitute a complaint. The distinction lies in the language used in the letter and in a reasonable interpretation of that language.

We will maintain a complete record of all the complaints which we have received since the date of our last Market Conduct Examination. This record shall indicate the total number of complaints, their classification by line of insurance, the nature of each complaint, the disposition of these complaints, and the time it took to process each complaint.

When we receive a complaint we will do the following:

- The complaint is initially referred to Richard Hogan, the Vice President and Chief Compliance Officer;
- Mr. Hogan reviews the complaint and refers it to the appropriate person at CATIC Title Insurance Company to be processed. Mr. Hogan first determines whether the complaint is a claim; if it is determined to be a claim the complaint is referred to the Claims Department;
- A letter acknowledging receipt of the complaint will be mailed out within 14 days of receiving it. If the complaint was generated by a state Insurance Department all correspondence will be shared with such Department;
- We will then investigate the complaint;
- After the complaint is investigated the findings of the investigation are transmitted to the complainant and a copy of all correspondence is shared with Richard Hogan, the Vice President and Chief Compliance Officer. If the complaint originated in a state Insurance Department the correspondence will be shared with said Department as well;
- We will close the complaint and record the outcome in the Complaint Log; and
- Annually, the Vice President and Chief Compliance Officer will meet with the General Counsel to review the complaints and also to determine if any trends are developing.