



MANDATORY INSURANCE BROKER INFORMATION DOCUMENT

(ARTICLES 28 AND 29 Law 4583/2018)

With this document and in the context of the current legislation, but also with the aim of building a relationship of trust and transparency with our clients, our company Comergon SA | Risk Managers | Insurance Brokers wishes to notify all clients of the following information which enables the timely, correct, adequate and appropriate awareness about the insurance coverage you requested us to research on your behalf.

General Information

Our company Comergon SA | Risk Managers | Insurance Brokers is a Société Anonyme (SA) company and we are active in insurance intermediation as an Insurance Broker.

- Our headquarters are located in 9 Brahamiou str, 151 24, Maroussi, Athens.
- Our General Registry number is 68910103000 and our VAT number is 095652952.
- Our company was founded on 1997.
- The paid-up shareholders' capital is €300,000.
- The Managing Director of our company is George Zafiriou.
- Communication with us is possible at +30 210 6196525 and at info@comergon.gr.
- You may have a good overview and additional information about our company at www.comergon.gr.

Licensing Information

Our company is registered with the Athens Chamber of Professionals with general registration number 27848 and specific registration number 38.

The Athens Chamber of Professionals, where the Registry of insurance intermediaries that are based in Athens is maintained, is located at:



44 Panepistimiou Street, PC: 10679
tel. +30 210 3380200, +30 210 3601651-3
eea@eea.gr
<https://www.eea.gr/home-en/>

To verify our registration in the Registry of insurance intermediaries you can refer to the internet link of the Single Information Point (<https://insuranceregistry.uhc.gr/search>) of U.H.C.C.

All our employees are licensed and certified to work in an insurance broker company and in the above particular link they are listed by name.

Capital Participations

Comergon SA | Risk Managers | Insurance Brokers does not participate directly or indirectly with voting rights or by holding shares in any insurance company.

No insurance company has a direct or indirect participation in Comergon SA | Risk Managers | Insurance Brokers through voting rights or by holding capital.

Provision of Objective Consulting

Comergon SA | Risk Managers | Insurance Brokers does not maintain any exclusive cooperation with any insurance company. Therefore, for the insurance policy we propose to you, we declare that we represent exclusively yourselves, as we have no contractual obligation to carry out insurance intermediation activities exclusively with one or more insurance companies. If you wish, you have the right to submit a request to us so that we can inform you about the names of the insurance companies with which we can engage in insurance intermediation.

Comergon SA | Risk Managers | Insurance Brokers provides you with advice based on the information we have received from you, based on an unbiased and personalized analysis of a sufficient number of insurance programs available in the Greek and European insurance markets



and proposes according to professional criteria the insurance policies that mostly meet your needs. For this reason, you must fill in the special Customer-Needs Form which clarify your insurance and financial needs and possibilities. Prior to the binding of the insurance policy, we will also provide you with the relevant information documents related to the proposed insurance policy.

Investment Products

Comergon SA | Risk Managers | Insurance Brokers is licensed to promote insurance-based investment products and we have the legal certification for that.

In the context of the promotion of investment products based on insurance, and before concluding with the binding of the relevant insurance policy, depending on the type and nature of the investment product based on insurance as well as the terms of the policy and your personal requirements, Comergon SA | Risk Managers | Insurance Brokers will provide you with the following:

1. Information on the total costs and any relevant charges on the product relevant to the product itself and/or due to any payments to third parties and/or due to the provision of consulting services by our company, and the impact of these on your investment, as well as, upon your relevant request, a detailed recording of these.
2. Options on how you can pay.
3. Guidance and warnings on the risk profile of the product or investment strategy.
4. Product evaluation statement including our recommendation and our explanation of how the product meets your choices, goals and features.
5. Report on the assessment of the suitability of the recommended products by the



respective insurance company, which is delivered after the binding of the relevant policy and on an annual basis starting from the commencement of the policy.

Collection of Insurance Premium

Comergon SA | Risk Managers | Insurance Brokers is mandated to collect your premium on behalf of all the insurance companies for which it mediates and then pay these forward to them. In case of special circumstances, of which we will inform you in advance, it is equally acceptable to pay the premium directly to the bank account of the respective insurance company.

Remuneration Policy

Comergon SA | Risk Managers | Insurance Brokers is committed to act in its clients' best interests by providing quality products and services that meet as well as anticipate our clients' risk management requirements.

Comergon SA | Risk Managers | Insurance Brokers is remunerated for its services principally through commissions paid by insurance companies (which are included in the premium you pay) and through service fees paid to us by our clients, or in certain cases by a combination of commissions and service fees. In case of service fees we will inform you on the fee amount and, if applicable, on the method of calculating it. In your payments to us it will be clear what amount is related to premium and what to service fee.

It is a long-standing practice in the insurance industry for insurance companies to also remunerate insurance brokers with additional fees which are calculated based on various factors such as aggregate premium volume, retention, portfolio loss ratios and profitability etc. These arrangements are typically referred to as contingencies or overrides.

Comergon SA | Risk Managers | Insurance Brokers maintains a variety of these compensation arrangements with insurance companies, none of which is client specific. Our operating model



seeks to ensure that these arrangements do not, in any way, create a conflict of interest and/or prejudice our judgment as an insurance intermediary nor diminish our ability to appropriately and equitably serve the needs of our clients whose interests we represent.

If you have any questions regarding these additional fee arrangements, we invite you to contact George Zafiriou, Managing Director, at 210 6196525 or at g.zafiriou@comergon.gr.

Exceptions for Provision of Information (Article 32, Law 4583/2018)

The above information need not be provided if the mediation by Comergon SA | Risk Managers | Insurance Brokers refers to Large Clients, as such are defined by Solvency II – Law 4364/2016 article 3 paragraph 27.

Objections / Protests / Complaints

In case, as a recipient of the services we provide to you, you want to express your grievance you can file a complaint, ie a statement of dissatisfaction.

It should be noted that such complaints do not include submission of claims, indemnification requests or simple issues related to the performance of the insurance policy or the provision of information or clarifications.

Our specialized staff is at your service by phone to resolve any issue that concerns you or to inform you of the time that will be required to provide you with a response, which for simple issues does not exceed two working days. For issues that require more time, we will contact you within two working days and inform you about the procedure we follow in order to satisfy your request. Our Communication Center is at your disposal during working days 9:00 - 17:00, at 210 6196525.

In case you choose to submit your complaint to us in writing, contact us as follows:



To

Comergon SA | Risk Managers | Insurance Brokers

info@comergon.gr (if by e-mail)

9 Brahamiou str., 151 24, Marousi, Athens (if by ordinary post)

Mr. George Zafiriou

SUBJECT: Filing of Complaint

Regardless of the way you submit your written complaint, you will receive immediate proof that we received it where you will be informed about the time we are committed to settling it, which in no case will exceed 20 calendar days. If for exceptional reasons we expect that we will not be able to respond to you within the time period in which we are committed, we will inform you in writing of the new probable time of completion of the investigation of the complaint and receipt of the response from our company.

You also have the right to file a written complaint as an insured, policyholder, insurance beneficiary, consumer association or interested party, to:

Bank of Greece

Department of Private Insurance Supervision (D.P.I.S.)

21 El. Venizelou Ave., 102 50 Αθήνα

Tel. 210 3205222 – 3

Fax: 210 3205437 – 8

<https://www.bankofgreece.gr/en/main-tasks/supervision/private-insurance>

<https://www.bankofgreece.gr/en/useful-links/contact-form>

Your written complaint to D.P.I.S. against an insurance or reinsurance intermediary concerns any act or omission that constitutes a violation of the current legislation on insurance mediation or is contrary to good and transactional ethics or conflicts with public order, in particular for acts or omissions which, according to the justified judgment of D.P.I.S., can be attributed to our



company. Your complaint will be examined by the competent committee of D.P.I.S. after a previous hearing of our company and you will be provided with a justified answer within a reasonable time. D.P.I.S or you, can refer the dispute to the Consumer Ombudsman if accepted by the parties involved (you and our company), without limiting the possibility of either us making an out-of-court settlement for resolving the dispute or for appealing to the relevant courts.

In case you want to contact the Consumer Ombudsman, the contact details are as follows:

Consumer Ombudsman

144 Alexandras Ave., 114 71 Athens

Tel. 210 6460862, 2106460814, 2106064612, 2106460734, 2106460458

Fax: 210 6460414

Finally, you can also contact the General Secretariat for Trade & Consumer Protection, the contact details of which are as follows:

General Secretariat of Trade & Consumer Protection

Kannigos Square, 106 77, Athens

Tel. 1520, 210 3893000

Fax: 210 3843549

We inform you that the activation of the complaints' procedure does not interrupt the statute of limitations for your legal rights.

For each complaint Comergon SA | Risk Managers | Insurance Brokers will keep a record that includes the following:

- Date of submission and closing of the file
- Applicant identification details
- Insurance line and type of insurance policy



- Brief description of the complaint
- Outcome of the complaint

Rules of Professional Ethics & Requirements for the Provision of Information

1. The distributors of insurance and reinsurance products, when exercising the activity of distribution of insurance products, always act in an honest, impartial and professional manner, with the aim of serving its clients' best interests.
2. Without prejudice to those defined in article 32 of Law 4583/2018, when the insured risk is in Greece or the Member State of the insurance obligation is Greece or the insured and/or the recipient of the insurance is a resident of Greece, the provision of advice by a distributor to the customer according to articles 30 and 40 of Law 4583/2018 is mandatory during the distribution of insurance products of all insurance lines.
3. Distributors of insurance and reinsurance products:
 - a) explain to the client the terms of the insurance policies they propose, the rights and the obligations of the client and ensure that the information received by the client is timely, complete, correct, adequate and appropriate,
 - b) point out to the client the consequences of early termination or cancellation or redemption of its insurance policy, as well as any exemption from insurance coverage, and inform him of its obligation to prepay the premium and the consequences of late payment of the premium due,
 - c) inform the client about the rights of objection, withdrawal and termination of its policy and provide the client with the relevant forms with proof of receipt,
 - d) inform the client if they cease to carry out the insurance distribution activity,



- e) promote only products of insurance companies that are legally active in Greece.
4. Distributors of insurance products are prohibited from using methods of unfair competition, as well as unfair, illegal or misleading acts and practices. In particular, it is prohibited to:
- a) present a misleading insurance policy as the valid invoice and the terms of the insurance policy,
 - b) promise the client coverage that is not included in the insurance product they are promoting, or conceal risks that the client bears and/or costs that are borne by the client,
 - c) create, reproduce and disseminate statements and rumors which are not based on officially disclosed information and which are made knowingly concerning the financial situation and/or the vocational training and general quality of services provided by other distributors or other insurance undertakings,
 - d) offer discounts or special benefits for the purpose of binding an insurance policy;
 - e) advertise discounts, benefits or even provisions that do not comply with the applicable tariffs and terms of insurance policies;
 - f) distinguish between clients who have the same insurance conditions,
 - g) falsify, alter and in any way interfere with the form or content of documents relating to the insurance policy, such as applications, insurance policies and premium receipts,
 - h) collect premium without taking the necessary steps to bind an insurance policy,



- i) deliver a non-genuine insurance policy to the client.
5. The distributors of insurance and reinsurance products comply with the obligations of articles 27 to 40 of Law 4583/2018, pre-contractually and in any change of particular terms, insurance product or insurance company.
 6. Distributors of insurance products shall display in a visible place in the office of their employees directly involved in the distribution activities a plate with the details of these employees, stating that the said employees have the necessary qualifications to mediate in the binding of insurance policies, with special mention if, as the case may be, it is allowed to promote insurance policies with investment characteristics.
 7. Without prejudice to the provisions of Law 2251/1994 (A' 191), the information related to the object of the present, including the advertisements addressed by a distributor of insurance products to a client or potential client, are impartial, clear and not misleading. Advertisements must always be clearly identified as such.
 8. Distributors of insurance products are not remunerated nor remunerate or evaluate the performance of their employees in a manner that conflicts with their duty to act in the best interests of the client. In particular, the distributor of insurance products does not enter into any commercial agreement or cooperation from which the remuneration, sales goal or financial benefit of the distributor in any other form would be an incentive for him or his employees to recommend a specific insurance product to a customer, when they could recommend a different insurance product, which would better meet the customer's needs.
 9. Further to the provisions of articles 27 to 40 of Law 4583/2018, by decision of the supervisory authority published in the Government Gazette, additional clarifications may be provided, additional obligations for the provision of information and code of conduct may be determined, standards for the codification of the provided information to the



client may be supplied, in particular regarding the form, extent and content and to set the administrative sanctions for the violation of the provisions of the above decision.

This Mandatory Insurance Broker Information Document is available electronically and/or through our company's website. It is also available in hard copy, upon request.

For the company,

Comergon SA | Risk Managers | Insurance Brokers

Marousi, May 2023

