

## Genworth's Complaint Management Program Practices and Procedures

### Definition of Complaint

Genworth Mortgage Insurance defines a complaint as any verbal or written expression of dissatisfaction from an external source.

### Complaint Process

A complaint may be received by phone, email or a written letter and is recorded in an internal online system. The system tracks complaints to ensure a response is timely delivered to the complainant. Compliance is notified of all submitted complaints. We provide training to our employees on the complaint management process and online system. External distribution of the training documentation is not allowed per Genworth policy.

Each complaint is assigned to an owner based on the category of the complaint. Examples of complaint categories are MI Rates and Products, Adverse Action Notices and Lender Services.

It is our practice to acknowledge receipt of a complaint within 5 business days by contacting the complainant via phone, email or written letter. The owner is responsible for researching the complaint and collaborating with Compliance on the response. The owner may reassign the complaint to Compliance to contact the complainant and manage final resolution. The response to the complainant is maintained in the online system.

### Complaint Monitoring and Oversight

Complaints are tracked and monitored for resolution/response. It is a state insurance regulatory requirement to respond promptly and accurately to complaints. Regulators allow 30 days from "date received by Genworth" to respond to a complaint.

A complaint not resolved within 30 calendar days is considered a defect and reported to Genworth Financial, Inc.'s Risk Committee of the Board of Directors on a quarterly report. In 2018 Genworth had no late responses.

Complaint data is analyzed monthly in a variety of ways including stratification by category (e.g. MI product), type of complaint (e.g. consumer or customer dissatisfaction), and description of complaint (e.g. lack of responsiveness by customer, service provider or Genworth). By monitoring the complaints, we can identify trends, initiate the appropriate corrective action and drive any required changes to our systems or processes. Generally, our complaint volume is low, trending at less than 2 complaints per 100,000 policies in force per quarter.

### Customer Involvement in Complaints

Periodically complaints received by Genworth relate to a customer's process, such as mortgage insurance cancellation. Those matters are referred to either the Loan Originator or Servicer as applicable. A customer is informed of a complaint if a complainant is threatening legal action against Genworth and/or the customer. We will also solicit a customer for assistance if needed to resolve a

complaint. While there are no routine complaint reports available for external distribution to our customers, a customer report can be provided of any complaints received from your consumers or concerning your business upon request.

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