

**Zurich Kotak General Insurance
Company (India) Limited**

Grievance Redressal Policy

1. GRIEVANCE REDRESSAL POLICY STATEMENT

There are complaints arising due to varied level of service, commitments which may not always be as per the company standards. This often leads to customer dissatisfaction. We understand this and therefore seek infinite possibilities to leverage our customer service processes by driving an effective complaints management program.

Zurich Kotak General Insurance Company (India) Limited (ZKGI) listens and positively responds to customer complaints. “Complaint” or “Grievance” means written expression (includes communication in the form of electronic mail or other electronic scripts), of dissatisfaction by a complainant with insurer, distribution channels, intermediaries, insurance intermediaries or other regulated entities about an action or lack of action about the standard of service or deficiency of service of such insurer, distribution channels, intermediaries, insurance intermediaries or other regulated entities. An inquiry or request would not fall within the definition of the “complaint” or “grievance”.

We ensure all complaints are dealt with fairly and employees have the necessary skills to manage these expressions of dissatisfaction confidently and competently to their resolution.

The following principles underpin ZKGI complaints management policy:

- Easy access to information and advice for all stakeholders.
- Application of natural justice and provision of avenues for review.
- Protection of confidentiality and complainants respectfully treated.
- Complaints are addressed fairly, reasonably and in a timely manner.
- Complainants are not to suffer reprisal for making a complaint.
- Complaints data is integrated into business improvement processes.
- The complaint management policy and its application is reviewed regularly to ensure it remains an effective and appropriate mechanism for business improvement.

The objective of the ZKGI complaints management policy is to encourage the expression of customer dissatisfaction in a positive environment to have a prompt investigation followed by a fair decision making to redress the grievance. Such expression of customer dissatisfaction will have effective and prompt analysis of the root causes of complaints.

The underlying principles for complaints management policy will promote natural justice, avenues for reviewing repeated complaints and customer confidentiality. The complaint management policy and its application shall be reviewed regularly to ensure it remains an effective and appropriate mechanism for business improvement.

2. GRIEVANCE OFFICER/S:

ZKGI shall have a designated Grievance Officer of a senior management level. Senior Management would mean either the CEO or the Compliance Officer of the company. Every office other than the Head/Corporate/Principal officer of ZKGI shall also have an officer nominated as the Grievance Officer for that office.

3. GRIEVANCE REDRESSAL SYSTEM/PROCEDURE IN ZKGI:

ZKGI shall have a system and a procedure for receiving, registering and disposing of grievances in each of its offices. The following minimum time-frames shall be adopted:

- ZKGI shall send a written acknowledgement to a complainant within 3 working days of the receipt of the grievance.
- The acknowledgement shall contain the name and designation of the officer who will deal with the grievance.
- It shall also contain the details of the insurer's grievance redressal procedure and the time taken for resolution of disputes.
- Where ZKGI resolves the complaint within 3 days, it may communicate the resolution along with the acknowledgement.
- Where the grievance is not resolved within 3 working days, ZKGI shall resolve the grievance within 2 weeks of its receipt (except complaints requiring detailed investigation) and send a final letter of resolution.
- Where, within 2 weeks, the company sends the complainant a written response which offers redress or rejects the complaint and gives reasons for doing so,
 - a) ZKGI shall inform the complainant about how he/she may pursue the complaint, if dissatisfied.
 - b) ZKGI shall inform that it will regard the complaint as closed if it does not receive a reply within 8 weeks from the date of receipt of response by the insured/policyholder.

4. TURNAROUND TIMES:

There are two types of turnaround times involved.

- i. The service level turnaround times, which are mapped to each classification of complaint (which is itself based on the service aspect involved).
- ii. The turnaround time involved for the grievance redressal.

As to (i), the TATs are as mapped to the classification and prescribed by IRDAI to insurers. These TATs reflect the time-frames as already laid down in the IRDAI Regulations for Protection of Policyholders Interests and more, as, wherever considered necessary (for certain service aspects not getting specifically reflected in the Regulations), specific TATs are indicated in the classification and mapping provided by the Authority.

As regards (ii) above, the minimum TATs required to be followed shall be as prescribed in guideline 3 as prescribed above.

5. CLOSURE OF GRIEVANCE:

A complaint shall be considered as disposed off and closed when

- The company has acceded to the request of the complainant fully.
or
- where the complainant has indicated in writing, acceptance of the response of the insurer.
or
- where the complainant has not responded to the insurer within 8 weeks of the company's written response.
or
- where the Grievance Redressal Officer has certified that the company has discharged its contractual, statutory and regulatory obligations and therefore closes the complaint.

6. CATEGORISATION OF COMPLAINTS:

Categorisation of complaints as prescribed by the IRDAI from time to time shall be adopted by ZKGI and incorporated in the Grievance Management systems.

7. MINIMUM SOFTWARE REQUIREMENTS:

ZKGI shall have automated systems that will enable online registration, tracking of status of grievances by complainants and periodical reports as prescribed by IRDAI. The system shall be integrated seamlessly with the IRDAI's system in the manner prescribed. The Information Technology development will be done in a phased manner.

8. CALLS RELATING TO GRIEVANCES:

ZKGI shall also have in place a system to receive and deal with all kinds of calls including voice/e-mail, relating to grievances, from prospects and policyholders. The system should enable and facilitate the required interfacing with IRDAI's system of handling calls/e-mails.

9. PUBLICIZING GRIEVANCE REDRESSAL PROCEDURE:

ZKGI shall publicize its grievance redressal procedure and ensure that it is specifically made available on its website.

10. POLICYHOLDER PROTECTION COMMITTEE:

ZKGI shall ensure that the Policyholder Protection Committee, as stipulated in the guidelines for Corporate Governance issued by IRDAI, is in place and is receiving and analysing the required reports from the management and is carrying out all other requisite monitoring activities.