

GRIEVANCE REDRESSAL POLICY



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1. INTRODUCTION

Timely redressal of grievances is crucial for enhancing customer confidence in the insurance industry. The grievance redressal mechanism and compliance requirements for insurers are stipulated in the IRDAI (Protection of Policyholders' Interests, Operations and Allied Matters of Insurers) Regulations, 2024, alongside the IRDAI Master Circular on Operations and Allied Matters of Insurers 2024 and IRDAI Master Circular on Protection of Policyholders' Interests, 2024.

In response, Aviva Life has decided to establish an effective and robust grievance redressal system. This shall include enabling online submission of grievances, establishing mechanisms to register all grievances received through various channels such as the call center of Aviva Life, and implementing Internal Ombudsman Schemes. The Company shall also undertake extensive publicity of these arrangements.

In the light of the aforementioned statutory provisions and obligations, this policy has been formulated.

2. DEFINITIONS

The following terms for the purpose of this policy shall carry the meaning as mentioned below:

2.1 “Authority” or “IRDAI”

Authority or IRDAI shall mean the Insurance Regulatory and Development Authority of India established under sub-section 1 of Section 3 of the IRDA Act 1999.

2.2 “Board”

Board shall mean the Board of Directors of Aviva Life Insurance Limited.

2.3 “Company”

Company shall mean Aviva Life Insurance Limited.

2.4 “Complaint” or “Grievance”

Complaint or Grievance shall mean written expression (includes communication in the form of electronic mail or voice-based electronic scripts) of dissatisfaction by a complainant with respect to solicitation or sale or purchase of an insurance policy or services related by insurers and/or by Distribution Channel.

2.5 “Complainant”

Complainant shall include a policyholder or prospect or nominee or assignee or any beneficiary of any insurance policy who has filed a complaint or grievance against the company and /or distribution channel of the Company.

2.6 “PPGR&CM”

PPGR&CM Committee shall mean Policyholder Protection, Grievance Redressal and Claims monitoring Committee as specified under the IRDAI Master Circular on Corporate Governance, 2024.

3.

APPLICABILITY

This Policy shall be applicable to all the policyholders of the Company, or prospect or nominee or assignee or any beneficiary of any life insurance policy of the Company.

4.

OBLIGATIONS OF THE COMPANY UNDER THIS POLICY

The Company shall:

- 4.1 have an appropriate system, including IT systems, and a procedure for receiving, registering and disposing of grievances in each of its offices. The Company shall publicize its grievance redressal procedure and ensure that it is specifically made available on its website;
- 4.2 implement a technology-based, robust mechanism for addressing policyholder grievances. This system should ensure efficient and speedy resolution and aim towards achieving 'zero grievances'.
- 4.3 maintain regular interaction with customers through user-friendly processes. This includes conducting awareness campaigns and providing a platform for submitting grievances online.
- 4.4 strengthen its grievance resolution processes by incorporating an internal escalation matrix. If grievance is not resolved at the first level, it shall be escalated appropriately.
- 4.5 have in place robust procedures and effective mechanisms to resolve grievances of policyholders and/or claimants efficiently, effectively and in a timely manner;
- 4.6 not prohibit, bar or discourage any policyholder or claimant from lodging any grievance to the Authority;
- 4.7 establish adequate Grievance Redressal Procedure in accordance with the prevalent regulatory prescriptions;
- 4.8 widely publish the availability of option to the complainant for taking up grievance with Insurance Ombudsman, in case the grievance is not resolved to the satisfaction of the complainant;
- 4.9 ensure that this infrastructure includes functionality to identify and manage unrelated or unidentifiable complaints that may be sourced by fraudsters;

- 4.10 ensure that the Policy Conditions shall inter-alia include the conditions for Grievance Redressal;
- 4.11 comply with the award of the Insurance Ombudsman within 30 days of receipt of award;
- 4.12 Ensure that the following details, inter-alia are included in the Life Insurance Policy-
 - 4.12.1 Internal Grievance Redressal Mechanism procedure of the Company.
 - 4.12.2 address and contact details of Insurance Ombudsman within whose territorial jurisdiction the branch or office of the Company or the residential address or place of residence of the policyholder is located.

5.

GRIEVANCE REDRESSAL PROCEDURES

- 5.1 The Company shall Establish and maintain a centralized complaint process and compliant handling process aimed at achieving "Total Customer Satisfaction." This centralized system shall ensure that all customer complaints, regardless of their nature or origin, are efficiently managed and resolved to the satisfaction of the complainant. By centralizing this process, the Company aims to streamline communication channels, minimize response times, and enhance overall customer experience.
- 5.2 The complaint handling process shall acknowledge and address all types of complaints, whether they pertain to employee conduct, distribution channels, or issues related to the services or products of the Company. This inclusive approach ensures that every complaint is duly considered and resolved in accordance with established protocols and regulatory requirements

- 5.3 The complaint handling process shall enable comprehensive root-cause analysis to identify and address the underlying factors contributing to recurrent issues.
- 5.4 The Company shall make sure that the handling process is designed to progressively minimize grievances and achieve "zero grievances." The Process shall include adopting consumer-friendly practices, enhancing transparency in complaint handling procedures, and empowering customers through accessible and responsive grievance resolution mechanisms.

6.

LOGGING OF COMPLAINTS

- 6.1 The Company shall Utilize advanced technology to facilitate grievance redressal swiftly and effectively. The Company shall implement robust processes and procedures to ensure that complaints are addressed within specified turnaround times. This includes leveraging automated systems for complaint tracking, escalation, and resolution. The aforementioned system shall include, among other things:
- 6.1.1 A technology-based grievance redressal system which shall include a grievance portal and app.
 - 6.1.2 The grievance portal/app shall be capable of capturing all types of grievances against the Company or its distribution channels.
 - 6.1.3 The Grievance portal/app shall be capable of addressing and resolving grievances from prospects and policyholders efficiently and within the specified turnaround times.
- 6.2 The Company shall provide multiple channels for policyholders or beneficiaries to lodge complaints if they are dissatisfied with the services of the Company or the distribution channel. Complaints can be submitted through any of the following methods:
- 6.2.1 Visiting the nearest branch
 - 6.2.2 Sending letters or emails

6.2.3 Using the website of the Company.

6.2.4 Calling the designated call center of the Company.

6.3 The Company shall allow policyholders or claimants to register complaints online through Bima Bharosa portal at <https://bimabharosa.irdai.gov.in/> of the Authority.

6.4 The Company shall integrate its grievance portal with the Bima Bharosa portal to enable online registration and tracking of grievances. The system of the Company shall include real-time mirroring functionality to ensure that its grievance database is consistently synchronized with the Bima Bharosa portal.

7.

OTHER OBLIGATIONS OF THE COMPANY

7.1 The Company shall implement a system to regularly gather customer feedback, especially after resolving grievances. This feedback should cover policyholders' experiences with the grievance redressal process and their satisfaction levels.

7.2 The Company shall include contact details of relevant Insurance Ombudsmen in its resolution communications, allowing policyholders to escalate complaints if they are dissatisfied with the grievance resolution by the Company.

7.3 The Company shall integrate its grievance portal with the Bima Bharosa portal to enable policyholders to register and track grievances online. The system shall include real-time mirroring to ensure synchronization of its grievance database with Bima Bharosa.

7.4 The Company shall record grievances received from prospects and policyholders through various channels (such as telephone calls, emails, physical posts, in-person complaints) on the Bima Bharosa platform.

7.5 The Company shall establish an Internal Ombudsman Scheme

- 7.6 The Company shall appoint a designated officer at every business location to handle grievances, along with a clear internal escalation matrix for unresolved complaints. Details of the grievance redressal mechanism shall be prominently displayed on the website of the Company and in all its offices.
- 7.7 The Company shall prominently display the name, address, and contact details of the insurance ombudsman within the jurisdiction of each of their offices.

8.

TURNAROUND TIME OF GRIEVANCE REDRESSAL

The company shall have the following timeline for grievance resolution:

Activity	Timeline
Written acknowledgement of grievance to a complainant	Immediately
Seek and obtain further details, if any, from the complainant (permitted only once)	One Week
Action on complaint and intimation of decision to the complainant	Two Weeks
Resolution of grievance and issue of final letter of resolution	Two weeks

Activity

If a complaint is not resolved, communicate the details to the Policyholder of options including referring the complainant to Insurance Ombudsman/Consumer Court

Closure of grievance on non-receipt of reply from the complainant

Timeline

Two weeks
(from original date of receipt of complaint)

Eight weeks

9.**REVIEW OF THE POLICY**

The PPGR&CM Committee and the Board shall review the Policy:

- 9.1 At least once every financial year, or
- 9.2 As and when the PPGR&CM and/or the Board considers it appropriate, or
- 9.3 As and when the underlying laws governing this Framework undergo any change.



BEWARE OF SPURIOUS / FRAUD PHONE CALLS!

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