

THE NEW INDIA ASSURANCE CO. LTD KUWAIT

GRIEVANCE REDRESSAL POLICY

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In order to meet the increasing legitimate expectations of customers for better, faster and more effective service, the Company shall constantly endeavor to improve its service delivery standards and capabilities. The Company expects all its Officers and employees to maintain highest standards of integrity and transparency in their transactions with customers & intermediaries and other stakeholders.

A Grievance is a documented manifestation of dissatisfaction of a customer. Such dissatisfaction, if left unaddressed and unresolved, could endanger the lifeline of the Company and erode its image. It is therefore expected that all employees shall devote attention, time and effort to resolve the Grievances of customers within the framework of the Company's guidelines and its Grievance Redressal Policy.

OBJECTIVES:

The objectives of the Grievance Redressal Policy are:

- a) To develop an organizational framework to resolve Grievances of Customers
- b) To provide the Customers access to immediate, hassle-free recourse to have their Grievances redressed.
- c) To enlighten the Customers on their duties and responsibilities to access benefits due under the insurance Policy issued to him/her.
- d) To establish structured interactions with Customers to elicit information on their expectations
- e) To identify systemic flaws in the design and administration of various general insurance products and to seek solutions thereon, and
- f) To institute a monitoring mechanism to oversee the functioning of the Grievance Redressal Policy

RESPONSIBILITIES FOR REDRESSAL:

The final responsibility for Grievance Redressal rests with the Chief Operating Officer (C.O.O.) of the Company. The complaints officer appointed is responsible for resolution of all the Grievances from the customers.

The Company expects that Grievance Redressal to be time bound and result oriented. Every Grievance is expected to be resolved within a maximum period of Fourteen days from the date of submission of complaint.

The C.O.O. of the company shall monitor status and progress of Grievance Redressal and the complaints officer shall furnish quarterly report on Grievance Redressal position for submission to Grievance Redressal Committee, C.O.O. as well as to Insurance Regulatory Unit (if required).

DOCUMENTING GRIEVANCES:

The Grievance Redressal Machinery starts with a proper documentation protocol.

A Grievance is defined as any communication that expresses dissatisfaction about an action or lack of action or about the standard of service / deficiency of service of the Company and/or an intermediary representing the Company.

Thus any communication, as defined above - written, verbal or digital- shall be recorded in the Grievance system.

Immediately on receipt of a Grievance, the complaints officer shall send a written communication to the complainant (the person who lodges the Grievance with the COMPANY), stating the following:

- a) Acknowledging his communication
- b) Promising necessary action within fourteen days from the date of receipt of the Grievance
- c) The name, address, email id and Phone number of the authority to whom the Grievance has been forwarded (in case the Grievance relates to another office)
- d) The name, address, email id and Phone number of the authority to whom the Complainant could escalate the matter if his Grievance is not redressed within the specified timeframe or if he is not satisfied with the action taken.

STRUCTURE OF GRIEVANCE REDRESSAL MECHANISM:

The Grievance Redressal machinery would be two tiered with the Grievance Redressal Committee & the C.O.O. at the branch office. While the principal function of the Grievance Redressal Committee & C.O.O. would be to redress the Grievances, it is expected that the C.O.O., takes a more proactive role in not only redressing Grievances, but in minimizing their incidence. This includes sensitizing all the front-end staff towards greater customer orientation. The C.O.O. shall address Grievance not only in terms of their content, but also in terms of their context, to discern circumstances that give rise to repeated Grievances. The C.O.O. shall also carry out a root cause analysis on the Grievances to provide inputs to the on-product redesign, policy redesign, emulation of best practices, etc.

REDRESSAL FUNCTIONS AT VARIOUS LEVELS:

To provide a meaningful review mechanism and a forum for appeal to the complainants on the decisions taken at operating levels, this policy envisages the constitution of Redressal at various levels as under:

Level I - Complaints officer:

An employee, within branch office, shall be appointed as the complaints officer. The Complaints officer shall take up any Grievance where the subject matter of dispute is repudiation of a claim or short payment of a claim or refund of premium or other service-related complaints. The complaints officer shall coordinate with the respective departments for redressal of the grievances received.

Complaints officer should inform the complainant of the decision and also of the fact that in case the complainant is not satisfied with the decision; he can apply for reconsideration of this Grievance Redressal Committee. The mail Id of the Grievance Redressal Committee shall also be furnished in such communication.

Level II - Grievance Redressal Committee:

The Grievance Redressal Committee (GRC) shall comprise of:

- Administrative Manager
- General Manager
- Chief Operating Officer (C.O.O)

The GRC shall be constituted by the Chief Operating Officer (C.O.O) of the branch Office.

The GRC shall take into consideration the following cases:

- a) Claims or Refunds exceeding the limits of lower-level officers
- b) Where the complainant is not satisfied with the complaints officer's decision can approach the GRC for reconsideration.
- c) Where there is no consensus among the members of the level I on any Grievance.

The Grievance Redressal Committee shall be convened at least once a month, unless there are no Grievances coming under consideration.

The GRC shall consider the different views of the handling officer, Surveyor, TPA, Complainant and all other relevant parties to pass a decision on the complaint. If need be the GRC can also consult an expert for the Redressal of the same.

If the decision is unanimous, the complainant should be informed of the decision and also of the fact that in case the complainant is not satisfied with the decision of the GRC; he can apply for reconsideration of this Grievance to the Insurance Regulatory Unit (IRU). The address of the Insurance Regulatory Unit (IRU) and contact details shall also be furnished in such communication.

POWERS AND LIMITATIONS OF THE COMMITTEES:

Any Grievance could be taken up for Redressal by the GRC only if the issue relates to policies being issued in Kuwait. The Committee concerned shall not consider any Grievance which is barred by Limitation either under the terms of the policy or under law.

CUSTOMER FOCUS:

Grievance Redressal Mechanism should not only seek to redress Grievances but also to avoid them. The company shall endeavor to improve service through constant interactions with the customers to elicit their views on service delivery standards, and to seek their suggestions for improvement. At least once per year a feedback shall be asked for by GRC where retail/corporate customers are

invited to offer opinions and suggestions on Customer service. Their feedback should be accorded due consideration by implementing their suggestions, wherever feasible.

The company shall take all efforts to abide by and enforce its Citizens' Charter in all its operations. The company shall respect and enforce Policyholders' Rights as enshrined in the Regulator's document. The company shall also abide by the Code of Commitment if any, from time to time, approved by the Insurance Regulatory Unit (IRU). It is also expected that the company should evolve its code of commitment on specific timelines for deliverables.

All efforts shall be made to leverage Information Technology for providing an easy platform to the customers to lodge grievances, to track the status of grievances, to enlighten them on claims procedures, to provide access to information on whom to contact and to enhance service standards.

The company recognizes its duties to customers who may not be inclined to approach through technology enabled channels, and to suit the needs of such customers, it is expected that the company shall establish enough facilities to enable them faster access for lodging a Grievance.

TRANSPARENCY:

Employees are expected to maintain transparency in their communication with the customers. Repudiation letters shall not be cursory, but shall elaborate the reasons on why a claim could not be entertained. Should the customer request to know why any settlement falls short of his claim, the company has an obligation to explain the difference, including providing a copy of the Survey Report, which incidentally, is a right under the Policyholders' Rights.

GRIEVANCES:

All coordination with Insurance Regulatory Unit, Ministry and other regulatory bodies would be done only by the complaints officer. All are expected to clear these Grievances expeditiously.

POWERS OF INTERPRETATION, MODIFICATION:

The C.O.O. of the company in co-ordination with the HO, if need be, is vested with the powers to lay down guidelines for the implementation of this policy and to modify procedures stated in this policy, within its overall framework.

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