

Kshema General Insurance Limited
Grievance Redressal Policy

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Document Title	Grievance Redressal Policy
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1.0	Kavitha N	Legal & Compliance	Board of Directors	07/07/2023
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Revision History:

Version	Revision/Addition																
1.3	<p>Clearer Classification: Concerns separated from Grievances with new definitions for Inquiry and Request to enable faster resolution and accurate reporting.</p> <p>Simplified Sources: Complaint source classification streamlined in line with IRDAI Master Circular for ease of understanding and consistent processing.</p> <p>Policy Review: Frequency of Policy review added in line with the regulations.</p> <p>Upgraded Mechanism: Enhanced Grievance Redressal framework ensuring clarity, regulatory compliance, and market-standard practices.</p>																
1.4	Key amendments																
<table border="1"> <thead> <tr> <th>Existing Policy Details</th><th>Updated as per IRDAI regulations / suggestions</th></tr> </thead> <tbody> <tr> <td>Toll-free number 1800 572 3013</td><td>Toll-free number 18005702998</td></tr> <tr> <td>E-mail - customer.support@kshema.co</td><td>E-mail – grievance.cell@kshema.co</td></tr> <tr> <td>--</td><td>For Senior Citizens – complaints.seniorcitizens@kshema.co</td></tr> <tr> <td>If you are not satisfied with the resolution provided by the Grievance Redressal Officer, you may register your complaints at Bima Bharosa Portal of IRDAI at https://bimabharosa.irdai.gov.in/. You may also reach out to IRDAI Grievance Call Centre (IGCC) at 1800-4254-732/155255 for voice calls and complaints@irdai.gov.in through e-mail for registration of your grievance/complaint. For more details, you may visit IRDAI site at https://irdai.gov.in</td><td>Deleted</td></tr> <tr> <td>“Complainant” means a policyholder or prospect or nominee or assignee or any beneficiary of an insurance policy who has filed a complaint or grievance against Kshema or its distribution channel.</td><td> <p>“Complaint” or “Grievance” means 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 related services by insurer and /or by distribution channel.</p> <p>Added -Explanation: An inquiry or service request would not fall within the definition of the “complaint” or “grievance”</p> </td></tr> <tr> <td>--</td><td>Definitions Added: Inquiry: An "Inquiry" is defined as any communication from a customer for the primary purpose of requesting information about a company and/or its services.</td></tr> <tr> <td>--</td><td> <p>Grievance redressal Procedure:</p> <p>Step 1 –Call, Email, Visit Us –Submit Grievance Form</p> <p>Step 2 – If not satisfied, contact the Grievance Redressal Officer at gro@kshema.co</p> <p>Step 3 – If still unresolved, escalate to the Insurance Ombudsman</p> </td></tr> </tbody> </table>		Existing Policy Details	Updated as per IRDAI regulations / suggestions	Toll-free number 1800 572 3013	Toll-free number 18005702998	E-mail - customer.support@kshema.co	E-mail – grievance.cell@kshema.co	--	For Senior Citizens – complaints.seniorcitizens@kshema.co	If you are not satisfied with the resolution provided by the Grievance Redressal Officer, you may register your complaints at Bima Bharosa Portal of IRDAI at https://bimabharosa.irdai.gov.in/ . You may also reach out to IRDAI Grievance Call Centre (IGCC) at 1800-4254-732/155255 for voice calls and complaints@irdai.gov.in through e-mail for registration of your grievance/complaint. For more details, you may visit IRDAI site at https://irdai.gov.in	Deleted	“Complainant” means a policyholder or prospect or nominee or assignee or any beneficiary of an insurance policy who has filed a complaint or grievance against Kshema or its distribution channel.	<p>“Complaint” or “Grievance” means 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 related services by insurer and /or by distribution channel.</p> <p>Added -Explanation: An inquiry or service request would not fall within the definition of the “complaint” or “grievance”</p>	--	Definitions Added: Inquiry: An "Inquiry" is defined as any communication from a customer for the primary purpose of requesting information about a company and/or its services.	--	<p>Grievance redressal Procedure:</p> <p>Step 1 –Call, Email, Visit Us –Submit Grievance Form</p> <p>Step 2 – If not satisfied, contact the Grievance Redressal Officer at gro@kshema.co</p> <p>Step 3 – If still unresolved, escalate to the Insurance Ombudsman</p>
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1. Introduction

Kshema General Insurance Limited, ("the Company" "Kshema" or "KGIL"), is working predominantly in agriculture and allied business sectors, building customized products for farmers and cultivators in the Indian agriculture sectors and also engaged in other general insurance business. The aim of the Company is to ensure no grievances by implementing this policy effectively. The Company has a robust mechanism in place to resolve/ address customer complaints in a timely and effective manner. The Company will strive to provide the highest quality of customer service to ensure continued customer satisfaction, retention and sustained growth of products and services. To facilitate the customers to raise their grievances, the Company has put an appropriate mechanism in place for redressal of customer grievances. The Company has established this Grievance Redressal Policy ("Policy") to supplement Company's board approved policy for the Protection of Interests of Policyholders.

This Policy outlines our approach to managing and resolving customer grievances, aiming to ensure satisfaction, retention, and continued growth through effective and transparent handling of complaints.

2. Objective

- a) Ensure the customer an unbiased, fair, and speedy means of dealing with complaints on an ongoing basis.
- b) All customers are treated fairly at all times. All complaints, critical requests and issues raised by customers are resolved within the timeline as specified by the IRDAI and incorporated in this Policy.
- c) Protect customers against fraud, deception, or unethical practices.
- d) Consistently assess the impact of services to serve clients better.
- e) Put in place a formal grievance redressal mechanism for the customers.
- f) Ensure speedy and efficient resolution of customer issues with adherence to basic principles of transparency and integrity.
- g) Educate the customers about escalation mechanisms for resolution of the complaints, if they are not satisfied with the Company's response.

3. Definitions

- a) **"Complaint/Grievance"** means 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 related services by Kshema and or/by its distribution channel.
- b) **Inquiry:** An "Inquiry" is defined as any communication from a customer for the primary purpose of requesting information about a company and/or its services and/or its products.
- c) **Service Request:** A "Service Request" is defined as any communication received from a customer with respect to change or modification in the policy details or any other services as sought by the policyholder/customer.

***Explanation:** For the purpose of clarity, An Inquiry or Service Request would not fall within the definition of the "Complaint" or "Grievance".*

- d) **“Complainant”** means a policyholder or prospect or nominee or assignee or any beneficiary of an insurance policy who has filed a complaint or grievance against Kshema or its distribution channel.
- e) **“Distribution Channels”** include insurance agents, intermediaries or insurance intermediaries, and any persons or entities authorised by IRDAI to involve in sale and service of insurance policies.
- f) **“Mis -Selling”** includes sale or solicitation of policies by the Company or through its distribution channels, directly or indirectly by
 - i. exercising undue influence, use of dominant position or otherwise, or
 - ii. making a false or misleading statement or misrepresenting the facts or benefits, or
 - iii. concealing or omitting facts, features, benefits, exclusions with respect to products or
 - iv. not taking reasonable care to ensure suitability of the policy to the prospects/ policy holders.
- g) **“Proposal Form”** means a form to be filled in by the prospect in physical or electronic form, for furnishing the information including material information, if any, as required by Kshema in respect of a risk, in order to enable Kshema to take informed decision in the context of underwriting the risk, and in the event of acceptance of the risk, to determine the rates, advantages, terms and conditions of the cover to be granted. For the sake of brevity, “Material Information” shall mean all important, essential and relevant information and documents explicitly sought by Kshema in the proposal form.
- h) **“Prospect”** means any person who is a potential customer and likely to enter into an insurance contract either directly with Kshema or through its distribution channel.
- i) **“Solicitation”** means an act of approaching a prospect or a policyholder by Kshema or by a distribution channel with a view to persuading the prospect or a policyholder to purchase or to renew an insurance policy.
- j) **“Unfair trade practice”** shall have the meaning ascribed to such term in the consumer protection Act 2019, as amended from time to time.

4. Documentation of Grievances

Grievance redressal mechanism starts with the standard documentation protocol.

- a) Acknowledging the grievance with a Unique Reference Number.
- b) Providing necessary action on the grievance received within the stipulated time frame.
- c) Escalation details like name, contact number, email address, website addresses and the Ombudsman details will be furnished.

5. Grievance Redressal Officer

- a) The Grievance Redressal Officer ('GRO') of the Company is placed at the Corporate Office of the Company and reports to the Chief Operating Officer. However, CEO may authorize any other senior management executive to supervise the GRO from time to time.
- b) The Company may, as may be required, designate the respective branch heads, if any, as the Grievance Redressal Officer for each branch office.

6. Source of Complaints

The Company may receive the complaint/grievance from Branch, Letter, Email, Website, Call Center, Bima Bharosa or such other modes as per IRDAI guidelines.

7. Grievance Redressal Mechanism

The Grievance Redressal Policy / Mechanism shall cover the grievances raised by Policyholders or any person claiming under the Policies issued by the Company with respect to an action or lack of action, about the standard of service/deficiency of service of the Company/intermediary relating to servicing of Policies, settlement of Claims and mis-selling.

Receipt of Grievances:

The Company shall establish a well-defined and structured process for receiving, classifying, and resolving inquiries, service requests, and complaints/grievances. Robust systems and controls shall be in place to ensure that all submissions are duly recorded, acknowledged, and addressed across all customer touchpoints in a fair and timely manner. Customers/policyholders may escalate or represent their grievances through the following channels made available by the Company:

Level 1:

Customers can contact the grievance desk as under

- grievance.cell@kshema.co
- **Toll Free Number: 1800 570 2998**
- Visit : Kshema General Insurance Limited, #413, 4th Floor, My Home Tycoon, Kundan Bagh, Begumpet, Hyderabad, Telangana - 500016, India.
- Dedicated Senior Citizen Helpdesk: complaints.seniorcitizens@kshema.co

If the Complainant has not received a response, or is not satisfied with the response or resolution provided, he/she may also visit the Company's website at <https://kshema.co/grievance-redressal/> to lodge their concern through the 'Grievance Form'.

Level 2:

If the Complainant has not received a response, or is not satisfied with the response or resolution provided at the above levels, and/or if the matter falls beyond the service parameters defined by the Authority, he/she may escalate the grievance at

- **Grievance Redressal Officer -- gro@kshema.co**

- Visit: Kshema General Insurance Limited, #413, 4th Floor, My Home Tycoon, Kundan Bagh, Begumpet, Hyderabad, Telangana - 500016, India.

Level 3:

If the customer's concern remains unresolved to their satisfaction after escalation to Levels 1 and 2, they may approach the Insurance Ombudsman for further redressal. Details of the Insurance Ombudsman offices are available at <https://cioins.co.in/>.

8. Grievance Redressal Procedure

- On receipt of any representation – Inquiry/Service Request/Complaint, the company shall send an acknowledgment immediately and also allot unique reference number.
- All the grievance received shall be forwarded to the SPOC/Manager of respective functions immediately.
- In the event that additional documents are required, the Customer Support team shall engage with the Complainant to obtain the necessary information and, upon receipt, forward the documents to the designated SPOC.
- Upon receipt of a complaint, an acknowledgement shall be issued to the Complainant immediately, and further action shall be undertaken in accordance with the turnaround times prescribed under this Policy.
- The Complainant can track the status of the Complaint through SMS on their registered mobile number and/or their registered email by logging-in to the Bima Bharosa portal or grievance portal or by calling the customer care number.
- Where the Grievance is not resolved in favour of the Complainant or partially resolved in favour of the Complainant, the Company shall inform the Complainant of the option to take up the matter before the Insurance Ombudsman in the relevant jurisdiction.
- Once registered, the Grievance Redressal Module shall sync the complaint to the Bima-Bharosa Portal of IRDAI.

For Senior Citizens

- Any grievance received by Senior Citizen shall be taken on priority and the Company shall ensure to take due precautions to close these Complaints expeditiously. In line with the regulations, a dedicated email address has been allocated to Senior Citizens.

9. Grievance Redressal System

- The Company shall have in place a system to receive and deal with all kinds of Complaints, relating to grievances, from Prospects and Policyholders;
- The system shall enable and facilitate the required interfacing with the IRDAI's system of handling Complaints.

- c) The Company shall issue a unique reference number to the Complainant.
- d) Complaints will be updated in the Bima Bharosa Portal of IRDAI upon receipt and followed until closure.
- e) The Company shall send a written acknowledgment to the Complainant and also the details of the closure as per directions of IRDAI;
- f) Closure of Complaint: A Complaint shall be considered as closed when:
 - i. The Company has acceded to the request of the Complainant fully;
 - ii. Where the Complainant has indicated in writing, acceptance of the response of the Company;
 - iii. Where the Complainant has not responded to the Company within 8 weeks of its written response;
- g) Collective insights from all the Complaints will be derived through detailed root cause analysis and necessary remediation measures will be implemented to avert recurrence; and
- h) Complaints of Fraud, Mis-selling, Malpractices will be intimated to Risk Management Committee for appropriate disciplinary and other actions. The Committee will review these insights to understand and act on improvement avenues.

10. Steps Taken in Mis-selling and Unfair Business Practices at Point of Sale and Services

Process for handling Mis-selling Complaints: The grievance redressal process set out in this Policy will be replicated for handling Mis-selling Complaints.

- a) Mis-selling Complaints are to be put on to the fast-track mode for resolution;
- b) Mis-selling Complaints are escalated to the respective distribution channel head for review and resolution;
- c) Mis-selling Complaints will be referred to concerned department for investigation and necessary action;
- d) Appropriate action and resolution are implemented after investigation and conclusion;
- e) Closure of the Complaint can further be classified in the following categories:
 - i. Complainant agreeing to retain the policy with actual terms and conditions of the product;
 - ii. If the Complaint is a proven case of Mis-selling, then premium refund will be initiated in favour of the Complainant; and
Disciplinary action will be initiated against the sales person/(s);
- f) Letter for closure of the complaint will be sent to the Complainant.

- g) Post resolution/closure of the Complaint, the Company shall, on random basis on regular interval, take the feedback from Policyholder on the grievance redressal process and the level of satisfaction.

11. Turnaround Time in the Grievance Handling

Sr No	Activity	Timeline (from the date of registration of the grievance)
1	Written acknowledgement of grievance to the Complainant	Immediately
2	Seek and obtain further details, if any, from the Complainant	Within 7 days
3	Action on Complaint & Intimation of Decision to the Complainant	14 days
4	If Complaint is NOT resolved by Kshema, communicate the details to the Policyholder of options including referring receipt of the Complainant to Insurance Ombudsman.	14 days from original date of receipt of Complaint*
5	Closure of grievance on non-receipt of reply from the Complainant	Within 8 weeks.

*(The Policyholder may approach the Insurance Ombudsman if his / her complaint is not resolved within 30 days or if the decision of the Company is not acceptable to the Policyholder.)

12. Policyholder Protection, Grievance Redressal and Claims Monitoring Committee (PPGR & CM Committee)

PPGR & CM Committee will be responsible for supervising redressal of customer grievance and to ensure the implementation of this Policy. Roles and responsibilities of the PPGR & CM Committee is outlined in the Company's Policy for Protection of Interest of Policyholders and can be accessed on the website at <https://kshema.co/investor-relations/policies/PPHI>.

13. Review of the Policy

The policy shall be reviewed on an annual basis or as per the requirement by the PPGR & CM committee or whenever any changes are to be incorporated into the Policy due to any amendment to the regulations.

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