



Kshema General Insurance Limited

Policy for Protection of Interests of Policyholders

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1. Introduction

Insurance Regulatory and Development Authority of India [IRDAI] has issued the IRDAI (Protection of Policyholder's Interests) Regulations, 2017 ("Regulations") vide ref IRDA/Reg/8/145/2017 dated 22.06.2017.

Pursuant to Regulation 5 of the Regulations, the Policy for Protection of Interest of Policyholders ("Policy") are framed herewith.

2. Objective

The key objective of the Policy is to provide a mechanism to educate prospects and policyholders about insurance products, benefits and their rights and responsibilities.

3. Scope

This Policy includes the following:

- a. Steps for enhancing insurance awareness and education of prospects and policyholders about insurance products, benefits and their rights and responsibilities.
- b. Service parameters including turnaround times for various services rendered.
- c. Procedure for expeditious resolution of complaints and grievance redressal mechanism.
- d. Steps to be taken to prevent mis-selling and unfair business practices at point of sale and service.
- e. Steps to be taken to ensure that during policy solicitation and sale stages, the Prospects are fully informed and made aware of the benefits of the product being sold vis-à-vis the product features attached thereto and the terms and conditions of the product so that the benefits of the product are not misstated / misrepresented.

4. Definitions

- a. "Applicable Laws and Regulations" means and includes but not limited to, the following:
 - i. IRDAI (Protection of Policyholders' Interests) Regulations, 2017 vide ref. IRDAI/REG /8/ 145/2017 dated 22 June 2017 as amended from time to time ('the Regulations');
 - ii. IRDAI Guidelines on Corporate Governance dated 18 May 2016 and related Circulars;
 - iii. IRDAI (Insurance Advertisements and Disclosure) Regulations, 2021; and
 - iv. The IRDA Act 1999, The Insurance Act, 1938 as amended by the Insurance Laws (Amendment) Act, 2015, The Insurance Rules, 1939, and applicable Regulations, Circulars and Guidelines issued by IRDAI as amended from time to time.
- b. "Authority" means the Insurance Regulatory and Development Authority of India.

- c. "Proposal Form" means " a form to be filled in by the Prospect in written or electronic for furnishing all material information as required by the Company in respect of a risk to take informed underwriting decision, and in the event of acceptance of the risk, to determine the rates, advantages, terms and conditions of the cover to be granted and it includes written proposal form, digital proposal form and video proposal form
- d. "Prospect" means any person who is a potential customer of an insurer and likely to enter into an insurance contract either directly with the insurer or through a distribution channel.

5. Governance Structure

- a. The Board has constituted the Policyholders' Protection Committee ("Committee"). The Committee shall comprise of at least one Non-Executive Director(s), Chief Finance Officer, Chief Underwriting Officer, Chief Compliance Officer, and such Senior Management personnel as the Board may determine. The appointment, resignation or changes in the composition of members shall be decided by and dealt with by the Board in accordance with the applicable laws and regulations.
- b. Chairman: Meetings of the Committee shall be chaired by the Non-Executive Director. If the Directors are not present at the Meeting, then the Members present shall elect a person among themselves as the Chairman of the Meeting.
- c. Attendance: The Chief Executive Officer, Appointed Actuary, Chief Risk Officer, Chief Operating Officer, Chief Compliance Officer will be invitees if not members of the Committee. Moreover, the Committee may invite any person to be in attendance to assist in its deliberations.
- d. Frequency of Meetings: The Committee may meet at such intervals, as may be decided from time to time; however, it shall meet at least four times in a year and not more than four (4) months shall elapse between two successive meetings of the Committee.
- e. Quorum: The quorum for the Committee meeting shall be one-third of the total strength or two members, whichever is higher
- f. The Committee shall invite an expert/representative of customers as an invitee to enable the Company to formulate policies and assess compliance thereof.

6. Role of the Committee:

- a. Adopt standard operating procedures to treat the customer fairly including timeframes for policy and claims servicing parameters and monitoring implementation thereof;
- b. Establish systems to ensure that policyholders have access to redressal mechanisms;

- c. Establish policies and procedures for the creation of a dedicated unit to deal with customer complaints and resolve disputes expeditiously;
- d. Establish effective mechanism to address complaints and grievances of policyholders including mis-selling by individual agents and intermediaries;
- e. Ensure that details of Insurance Ombudsmen are provided to the policyholders;
- f. Put in place a framework for review of awards given by Insurance Ombudsman/ Consumer Forums.
- g. Analyse the root cause of customer complaints, identify market conduct issues and advise the management appropriately about rectifying systemic issues, if any;
- h. Review at periodic intervals the measures and take steps to reduce customer complaints;
- i. Ensure adequacy of disclosure of “material information” to the policyholders in compliance with the requirements laid down by the Authority;
- j. Review of claims report, including status of outstanding claims with ageing of outstanding claims;
- k. Review of unclaimed amounts and repudiated claims with analysis of reasons;
- l. Ensure compliance with the statutory requirements as laid down in the regulatory framework;
- m. Provide details of grievances at periodic intervals in such formats as may be prescribed by the Authority;
- n. Submit the status report on policyholders’ protection issues to the Board of the Company for its review in each board meeting;
- o. Recommend a policy on customer education for approval of the Board and ensure proper implementation of the same;
- p. Report to the Board and perform such other functions as may be prescribed by the Board from time to time.

7. Steps For Enhancing Insurance Awareness and Education of Prospects and Policyholders

7.1 Steps for Education and Awareness to Prospects/Public:

- a. Benefits of General Insurance: Explanation on how general insurance helps create financial security for self and family
- b. Types of insurance products: Information on the types of insurance products, their features, benefits and points to be considered before deciding which one to buy.

7.2 Steps for Education and Awareness to Policyholders:

- a. **Products:** After a needs analysis exercise to identify and quantify needs of the prospect and basis his needs, a suitable product is identified for the Prospect. Basis this Information, plans are shortlisted and then the Prospect is explained how the product works, its benefits and the points to be considered before a decision to buy.
- b. **Rights and Responsibilities of Policyholders:**
 - Policyholders are explained their rights such as options for payment of premium, right to grievance redressal through the Company's designated grievance redressal officers at head office and at branch locations,
 - Policyholders are provided information on the number of days of enrolment window, cut-off date, the role of Insurance Ombudsman, the applicable provisions of the Consumer Protection Act, the importance of providing correct and complete information while answering all questions in the Proposal Form.

8. Grievance Redressal Policy:

There is a dedicated Grievance Redressal Policy hosted on the Company's website.

9. Review of Policy

The Policy shall be reviewed on an annual basis by the Committee or whenever any changes are to be incorporated in the Policy due to any amendment to the Regulations or as may be felt appropriate by the Committee.
