

PNB MetLife India Insurance Co. Ltd.

Grievance Redressal Policy

PNB MetLife India Insurance Co. Ltd (hereinafter called as PNB MetLife) key focus as a service organization is to provide best in class customer experience. While customer complaints are part of assessing customer satisfaction levels of any service organization and is prime concern for all business processes, our philosophy aims at providing best service. Customer satisfaction efforts rest on four-pillar approach, which is detailed in our philosophy.

Grievance Philosophy

Self-Empowerment

To provide self-help tools like policy information portal, online payment options, Auto SMS & Email, etc

Empowering Customer touch points

Web based printing of all customer communications, MIVRA for fund value, NAV, due date etc

Residual Customer Service through email, contact center & website

Fully equipped call center, Dedicated service SPOCs, Complaint Management System with integrated Email system

Benchmarking and surveys

Customer satisfaction survey and Key performance parameters linked with service standards

*“We are **Committed** to provide **Best In Class** services to all our customers, through well-defined Customer Complaint **procedures and guidelines** supported by **robust systems and trainings** to ensure that all complaints are resolved in a **Consistent, Fair and Transparent** manner within well-defined timelines”*

Objective

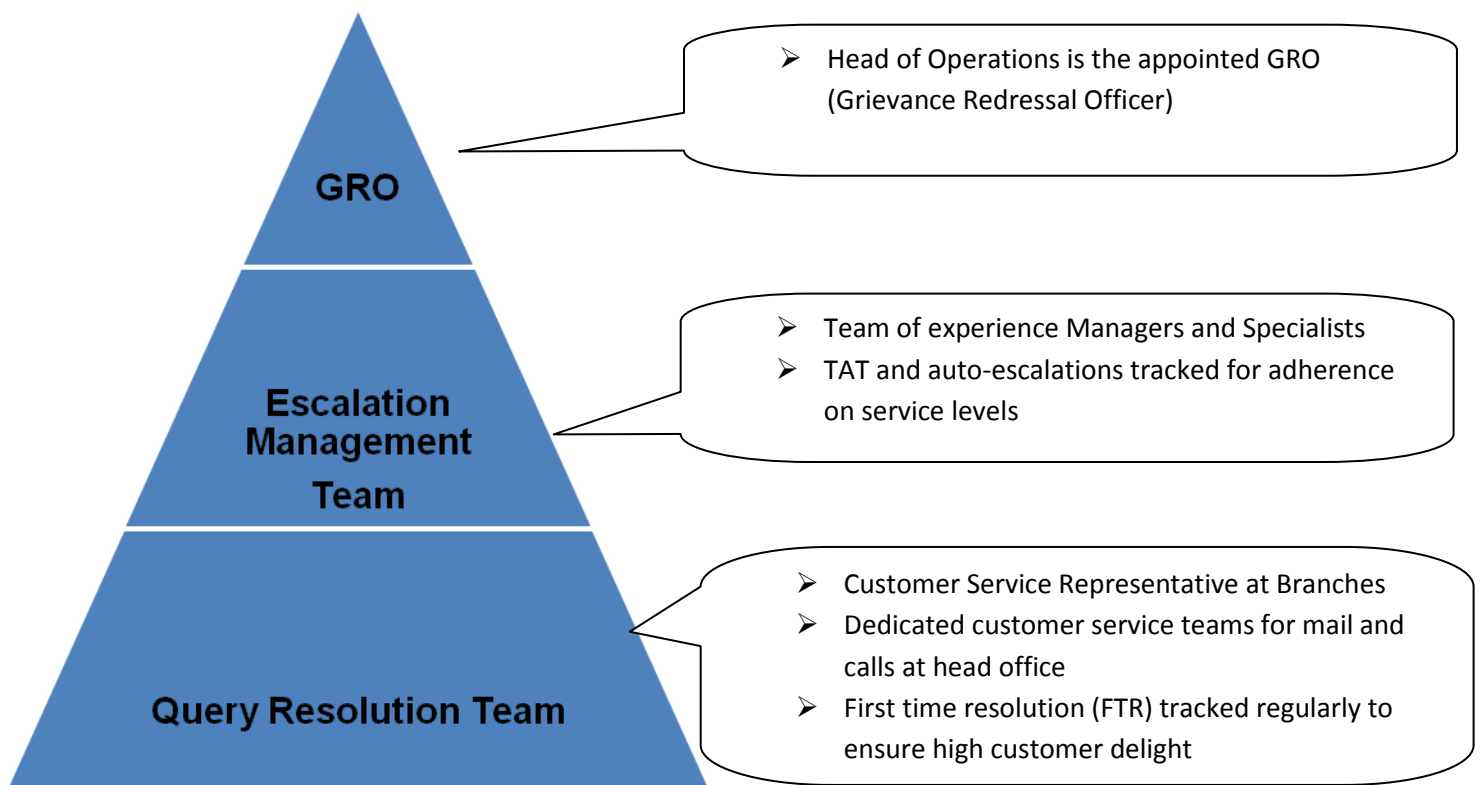
PNB MetLife, under the IRDA regulation of Protection of policy holders Interest, 2002 has put in place the grievance redressal mechanism to ensure effective and timely resolution of policy ‘holder’s concerns. This is in line with the guidelines issued by IRDA from time to time.

The Grievance Guidelines incorporated by PNB MetLife are applicable for resolution of any grievances /complaints.

Principles of Grievance Redressal:

1. Treat all grievances and complaints in fair, efficient and impartial manner
2. Deal with courtesy and as per defined timelines
3. Educate customers about the touch points for escalation of their complaints / grievances
4. Inform about the right to alternate remedy, in case of disagreement with the response
5. Identify process gaps and rectify from grass root levels to eliminate reoccurrence

Grievance handling approach



Guidelines of handling grievances

1. All complaints/grievance are recorded in our complaint management system
2. Customers are provided with the Interaction Id to facilitate follow-up, if required and future references
3. Acknowledgment is provided to the customer for complaints received
4. Timelines are defined for the resolution
5. Current status of lodged complaints can be accessed by the Customer at any of the Service Touch points, including PNB MetLife website
6. Close looping is done by communication of resolution to the customer
7. Complainants are informed about how he/she can /may pursue the complaint, if dissatisfied
8. Complaint management system is updated with every communication – email/ letter sent to the customer
9. Periodic reporting and review by senior management
10. A multi-layered approach for resolution with dedicated centralized teams and senior officials to address, investigate and resolve.

The policy provides for a detailed Standard Operating Process for addressing Grievances

SOP adheres to the IRDA Grievance redressal guidelines in terms of the following:

1. Grievance Redressal Officer to be appointed centrally and at regional offices
2. Complaints resolution TAT to be within regulatory timeline of 15 days
3. Acknowledgement to be sent within 3 days with name of the GRO handling the complaint
4. Touch points like Email id, toll free nos and PNB MetLife India Insurance Co. Ltd. website address is published in all customer communications.
5. Exhaustive listing of Insurance Ombudsman along with contact details is published in the policy document which a customer may contact in event he/she is not satisfied with the resolution provided by the Company or have not received any response.

Changes to the Policy

Any changes to the Grievance Redressal policy will be presented to the board for approval

Changes to the Standard Operating Procedure (SOP)

Changes in the Standard Operating Procedure (SOP) may be made by the management from time to time as these are more related to operational matters. The board approves this delegation to the management.

GRIEVANCE REDRESSAL PROCESS

Part A

This SOP is drawn up in line with the delegation approved in the grievance redressal policy

1.0 Introduction

1.1 Business Objective

The objective of this document is following:

1. Provide guidance to user/ stakeholders / departments for handling and resolving grievances
2. Define the procedure to be followed for handling grievances received in efficient, fair and impartial manner

1.2 Definition

Complaints/Grievances received from individuals (Policy Holders/ Claimants) are valuable ways of measuring the areas in which we need to improve. It is therefore important to monitor all complaints and address them within the prescribed regulatory TAT provided as per Grievance Redressal procedure.

“Complaints/Grievance”

A “Grievance/Complaint” is defined as any communication received from the policyholder (directly or indirectly via IRDA, Insurance Ombudsman or Consumer Courts etc) expressing dissatisfaction about an action or lack of action, about the standard of service/deficiency of service of an insurance company and/or any intermediary or asks for remedial action.

Registrations

Complaint and Grievance can be logged by the following on behalf of customer

1. Bancassurance Channel Partner
2. Bancassurance Sales Force
3. Branch Operations / Services
4. Financial Advisors
5. Corporate Agencies & Brokers
6. Agency Sales Force

In addition, existing policyholders and prospective customers can directly log in complaints relating to their policies or proposals through touch points.

2.0 Grievance Management

2.1 Grievance Redressal Mechanism

A multi-layered approach for resolution with dedicated centralized teams and senior officials to address, investigate and resolve.

1. Grievance Redressal Cell

If a customer is not satisfied with the resolution provided on any service/ product by our service touch points, he or she can approach Grievance Redressal Cell by writing to India_GrievanceCell@pnbmetlife.co.in. A dedicated team who reviews all such grievances received and provide a resolution to the customer on priority basis. All such Grievances are entered into our Complaint Management System for further resolution.

- The Central Grievance Redressal Team handles all grievances received through IRDA, Escalations to Managing Director/ Senior Management, etc.
- An acknowledgement is sent to the Customer acknowledging his/ her complaint/grievance within three working days of the receipt of the complaint/grievance. Simultaneously, Grievance Cell to log an interaction in our CRM “Talisma”.
- In case no resolution is available by the 3rd Working Day, then an email is sent to the Customer informing him/ her of the status and also indicating a tentative deadline for resolution and a final resolution/rejection is ensured within 2 weeks from the receipt of the complaint/grievance. In case of rejection, the reason for rejection would be mentioned.
- If the Customer is not satisfied with the resolution provided by India grievance cell, the Customer can go for second level of escalation as mentioned in the PNB MetLife Website.

2. Closure of Grievance:

A complaint/grievance shall be considered as disposed of and closed when:

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

3. Grievance Redressal Officer/s:

In the event, the customer is not satisfied with the resolution provided by the above touch points, then he/she can raise his/ her grievance by directly writing to the Grievance Redressal Officer centrally or at the local branch level via email at GRO@pnbmetlife.co.in or through a letter sent to the Registered Office i.e. All the Regional Service Managers (RSM) are designated Grievance

Redressal Officers (GRO) at a regional level and the customers may also approach them for Redressal of their complaint/grievance.

Role of Grievance Redressal Officer at the Branch Level: All the Regional Services Managers (RSM) are designated GRO for their respective regions. On receipt of a grievance, they will do a detailed investigation (need be interact with the customers) and log their case synopsis with their recommendation to the Grievance Redressal Officer through an email to GRO@pnbmetlife.co.in. Final closure with the customer would be done centrally.

Grievance Redressal Officer
PNB MetLife India Insurance Co.Ltd.
1st Floor, Techniplex-1, Techniplex Complex,
Veer Savarkar Flyover, Off S V Road Goregaon (West),
Maharashtra- 400062.

GRO is a representative of Customer and ensures appropriate resolution by interfacing with different functions within MetLife.

Responsibilities of GRO

1. Review the grievances received and resolve in co-ordination with departmental heads
2. Liaise with respective functions for speedy closure of complaint
3. Regularly review and suggest revisions (if needed) in the grievance handling procedures for the company
4. GRO would share findings and relevant gaps in the existing processes and work with process owners to put in place corrective actions

4. Ombudsman and IRDA

In the event a customer is not satisfied with the resolution provided by the Company or have not received any response, he/ she may contact the Insurance Regulatory and Development Authority for resolution.

Grievance cell (Complaint against Life Insurer)
Insurance Regulatory and Development Authority
Parishrama Bhawanam, 5-9-58/B, Basheerbagh, Hyderabad - 500 004
Toll Free: 155255
E-mail: lifecomplaints@irda.gov.in

Alternatively, Customer may approach the Insurance Ombudsman. Contact details are available at www.irda.gov.in

3.0 Grievance Registration & Touch Points

3.1 Touch Points

Our customers can register their grievances with us through various touch points

1. By writing an e-mail to Indiaservice@pnbmetlife.co.in or india_grievancecell@pnbmetlife.co.in
2. By calling our Toll Free :- **1-800-425-6969**

3. Through the MetLife India website
 - By logging in to the Policy Information Portal (PIP) <http://metcustomer.metlifeportal.co.in/wps/portal/metcustomer>
 - By clicking on the Grievance section
4. The Customer can lodge a complaint by written communication through Post / Courier / Fax to PNB MetLife HO @
Grievance Redressal Cell
1st Floor, Techniplex-1, Techniplex Complex,
Veer Savarkar Flyover, Off S V Road Goregaon (West),
Maharashtra- 400062.
5. Submitting a letter at any of the PNB MetLife's branches (the list of the existing branches is available on the PNB MetLife India website)
6. The Customer can lodge a written complaint through FA / CSO / Channel Partners
7. The Customer can lodge a complaint to IRDA (Insurance Regulatory and Authority/IGCC) or Insurance Ombudsman and in turn routed to PNB MetLife's Legal & Compliance department

3.2 Grievance & Complaints Classification

The customer care personnel can come across various other types of complaints from Customers other than the types listed below. The list below is an indicative list & not an exhaustive list of complaint. Also the classifications prescribed by the Authority from time to time shall be adopted and incorporated in the systems.

New Business Related Complaints:-

1. Complaints regarding delay in policy issuance
2. Delay in receiving the status of the application / requirement
3. Customer dissatisfaction over company's decision (policy postponed, declined)
4. Delay in receiving refund
5. Complaints regarding non-receipt policy document / delay in receiving the policy document

Policy Service:-

6. Correction in Address / Name / Title / Beneficiary
7. Delay in processing the Fund Switch
8. Delay in processing the free-look cancellation request and delay in receiving the refund cheque
9. Delay in processing change of frequency request (mode change)
10. Incorrect account statement / charges related complaints
11. Delay in receiving survival benefit cheque
12. Surrender related complaints
13. Complaints regarding assignment / re-assignment

14. Unprofessional behavior exhibited by any of the PNB MetLife's customer facing roles like Branch Operations, Sales, contact center etc
15. Other issues such as delay in Death / Maturity payout

Remittance:-

16. Complaints regarding the renewal premiums and accounting the same towards the due policy
17. Complaints regarding the incorrect lapsation and delay in reinstatement
18. Non receipt of renewal premium receipt (RPR)/ renewal premium notice (RPN)
19. Complaints regarding the SI / ECS related issues (delay in processing, double debit, delay in refunding the excess amt, incorrect processing, delay in allocating units)
20. Complaints regarding APL (Automatic Policy Loan) or Policy Loan
21. Complaints regarding receipt of incorrect reminder information through email / SMS.
22. Delay in processing the renewal premium payments

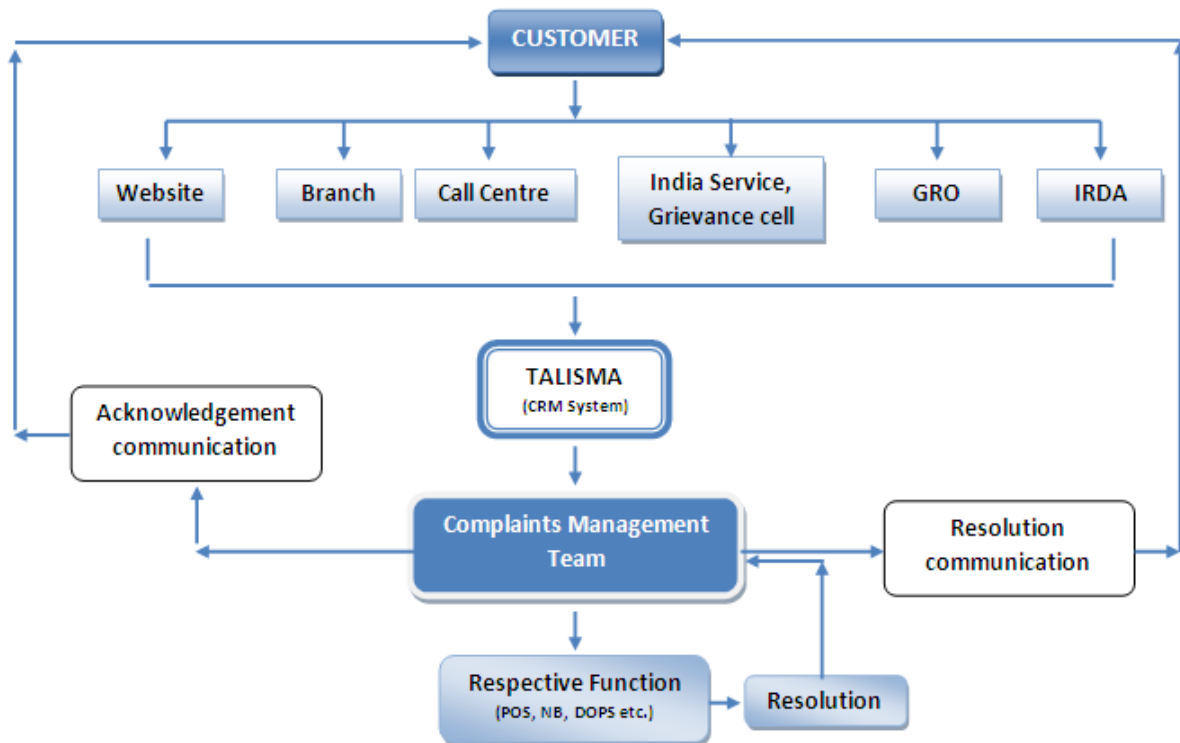
Sales (Agency & BABP):-

23. Mis-selling by FA / CSO
24. Misrepresentation of information on the policy
25. Fraudulence (signatures forged and manipulation on the information declared by the customer)
26. Complaints regarding the cash payment made to FA / CSO which is not accounted against premium
27. Inadequate service / support by the SM / FA
28. Service related issues
29. Fraud Investigation
30. Forgery of Documents complaint by FA /Customer
31. Misspelling by FA / CSO

Claims:-

32. Complaints from nominee/ assignees in case of death claim
33. Complaints regarding delay in survival/ maturity benefits.

4.0 Process Flow of Complaints Handling



5.0 System Support & Tools for Grievance Management

Grievance management is supported by integrated system / CRM tool called “Talisma”. The main functionalities of the system are:-

1. Interactive call logging system for all touch points

All touch points can log a complaint and scan images of the complaint letter through the system. The system generates a Complaint Reference No. which is communicated to the customer. The complaint is then resolved by the respective Process Owners at the Home Office. The resolution by the respective process owners is also communicated to the customer.

2. Seamless tracking of all complaints

Once all touch points log the complaints in the system, the complaint status can be tracked by various stakeholders at any given point of time.

3. Automated email alerts on call routing and resolution

At all points, an automated email is sent to the respective stake holders updating the status of such complaint logged, for e.g., As soon as the touch points log in a Complaint, an auto mailer intimates them of the details, namely Ticket No. Call type/Sub Type of the Complaint, Owner for resolution of the Complaint, the defined turnaround time etc. As and when the ticket is resolved by the respective process owner, an auto mailer again goes to the touch point intimating him/her about the resolution.

4. Real time integration with IGMS (Integrated Grievance Management System) and IRDA

IRDA's comprehensive Integrated Grievance Management System (IGMS) solution has the ability to provide a centralized and online access to the Policyholder, and provide complete access and control to IRDA for monitoring the grievance redressal procedure of the company.

When the Complaint Interactions are logged in Talisma, the same gets registered on IGMS site real time. All IGMS complaints post it gets registered in Talisma triggers an auto SMS/ Email with the IRDA token number and MetLife sequential complaint reference number.

5. Auto escalations basis predefined timelines

Upon logging of the Complaint in the system, there are auto escalations built which gets triggered in the event of the complaint not getting resolved within the defined turnaround time. All escalations pertaining to respective Call Type/Sub Type have a maximum of 3 (three) level escalation culminating into the Head-Customer Service & Operations. An auto mailer is sent to the escalation point updating him/her about the details of the complaint and for immediate closure.

6. View MIS basis Complaint Category, Classification, Turnaround time and by Location

The system has capability to generate periodic MIS for review basis complaint category, classification, turnaround time and by location.

6.0 Review and Monitoring process

6.1 Periodic Review

The MIS department publishes a MIS on periodic basis to all departments. The MIS includes no. of complaints received against each department with current status and timeline. It also highlights top complaints for the department

MIS is also published to Managing director and members of senior management for review. The Grievance Policy post approval by the Board will be published on the website and it may be noted

that any changes to the policy shall be reviewed by the board and approved in their subsequent meetings.

6.2 Root Cause Analysis

Centralized Complaints Analysis Team with dedicated members analyze complaints and perform Root Cause Analysis to identify process gaps or service deficiency to eliminate complaints of similar nature in future

6.3 Review Committee

The Policyholder Protection Committee, as stipulated in the guidelines for Corporate Governance issued by the Authority, is in place and is receiving and analyzing the required information from the management to comply with guidelines.

7.0 Preventive Measures to avoid Grievances

Pre-Sales

1. **Customer Profiler:** Mandatory profiler that helps to identify customer needs and suggests a list of best suiting products for the customer
2. **Benefit Illustration:** This is a mandatory document for all ULIP application which specifies the product charges with indicative returns
3. **Product Info on Website/Brochures:** Detailed and explicit information on our products is available on our website and brochures
4. **Training:** Mandatory trainings to sales force on products and time to time reinforcements of policy features etc

Post-Sales

1. **Welcome Calling:** An outbound call is made to our customers to take feedback and explain product features
2. **Key Feature Document:** A summary of key policy features is sent along with the Policy Document in a single sheet for the ease of understanding
3. **Copy of application Form:** A copy of the application form is sent to the customer along with the Policy Document for his review
4. **Specialist Team:** Dedicated central team of specialist to handle any complaints, which resolves the issue, provides root cause analysis, recommend corrective action & present the concern areas to the management
5. **Risk Control Unit:** Dedicated team for investigation of customer grievances internally and through external agencies related to misselling, forced sale etc. and helps in elimination of factors leading to customers concerns

8.0 Redressal of Grievances related to Outsourced Services

PNB MetLife in all respects would address any grievance received from customers and provide appropriate resolution within prescribed timelines. It is PNB MetLife's responsibility to do a root cause analysis of all such complaints received & share internally with respective functions/departments. PNB MetLife will ensure that all such departments duly appraise respective authorized vendors and ensure actionable are documented to be adhered by them. All departments to ensure SLA with authorized vendors are available which will address the same.

PNB MetLife customers can register their grievances as per touch points available to them – as mentioned in section 3.1 above

Part B

Information Relating to GRIEVANCE REDRESSAL MECHANISM of PNB MetLife India Insurance Co. Ltd. as submitted to the Regulator

1.	Name and designation of the Grievance Redressal Officer (GRO)	Taranjit Singh Head –Customer Service
2.	Contact Details (If GRO is different from Head-Customer Service, please mention details of Head, Customer Service also)	Taranjit Singh PNB MetLife India Insurance Co. Ltd, Platinum Towers, 4th Floor, Sohna Road, Sector - 47, Gurgaon – 122002 O: +91-124-4179000
	Contact Details of the GRO Full address Telephones Fax E-mail Id	PNB MetLife India Insurance Co. Ltd, Platinum Towers, 4th Floor, Sohna Road, Sector - 47, Gurgaon – 122002 O: +91-124-4179000 Email : gro@pnbmetlife.co.in
	Non-personal email ID for IRDA escalation	GRO@pnbmetlife.co.in
	Call center details - Toll free number: Email ID:	18004256969 Indiaservice@pnbmetlife.co.in
3.	Whether the Grievance Redressal Policy of your Company has been approved by the Board?	Yes
4.	The maximum TAT prescribed for resolution of grievances internally by your Company.	15 days
5.	Other features of your redressal mechanism that need to be disclosed to the policyholder	We aim to provide the best in customer service. In the rare event if customers are not satisfied with the services provided, they can highlight their concern on the below mentioned touch points: <u>Level 1</u> For any complaint/grievance, approach any of our following touch points: 1. Call 1800-425-69-69 (Toll free) or 080-26502244 2. Email at india_grievancecell@pnbmetlife.co.in Write to "Customer Service Department", PNB

		<p>MetLife India Insurance Co. Ltd., 1st Floor, Techniplex-1, Techniplex Complex, Veer Savarkar Flyover, Off S V Road Goregaon (West), Maharashtra- 400062. India</p> <p>3. Online through our website www.pnbmetlife.com</p> <p>4. Our nearest PNB MetLife branch across the country</p> <p>Level 2: In case not satisfied with the resolution provided by the above touch points, customer can write to our Grievance Redressal Officer at gro@pnbmetlife.co.in or send a letter to the PNB MetLife India Insurance Co. Ltd, Platinum Towers, 4th Floor, Sohna Road, Sector - 47, Gurgaon – 122002 or</p> <p>Level 3: In case customer is still not satisfied with the decision of the above officer, or have not received any response within 10 days, customer may contact the Insurance Regulatory and Development Authority for resolution: Grievance cell (Complaint against Life Insurer) Insurance Regulatory and Development Authority Parishrama, Bhawanam, 5-9-58/B, Basheerbagh, Hyderabad - 500 004 Toll Free: 155255 E-mail: lifecomplaints@irda.gov.in Or may approach the Insurance Ombudsman. Contact details of the same are available at www.irda.gov.in</p>
6.	Whether the Company has constituted the Board Sub-Committee for Protection of Policyholders? (Gist of the functions of this Sub-Committee to be provided).	<p>Yes, We have Policyholder Protection Committee constituting of select Board Members, Managing Director and Grievance Redressal Officer</p> <ul style="list-style-type: none"> • Review of Customer service performance • Review of implementation related to regulatory changes • Review of trends in areas like sales complaints, claims related complaints, etc • Review of actions to improve the policyholder awareness and customer service levels
7.	Whether root cause analysis for market conduct concern areas is done every quarter and corrective action initiated including at policy level	It's a continuous process at PNB MetLife, our compliance and Risk Unit is engaged in analyzing the causes. Some of the examples of corrective

		<p>action taken so far</p> <ol style="list-style-type: none"> 1. Customer Profiler is mandatory to identify customer needs & suggests a list of best suiting products for the customer 2. Detailed & explicit information on our products is available on our website and brochures 3. Welcome Call to customers to take feedback and explain product features 4. Summary of key policy features along with the Policy Document for the ease of understanding
8.	Whether your Organisation has Market Conduct Cell/Department to take appropriate action on the erring stakeholders	<p>Dedicated Internal Compliance and Risk Control Unit to take appropriate action, if required supported by</p> <ul style="list-style-type: none"> • Malpractice Matrix – A framework of disciplinary actions against misconducts & frauds • Weekly communication on malpractice deterrents to Sales, Training & Services to caution on action against infractors • Quarterly RAG Report at branch / region level to highlight Risk negative cases
9.	Whether you have an automated grievance redressal system (including business rules for allocation to related work group and work flows for auto-escalation in case of non-resolution) in place	<p>Yes, we have customer relationship management software “ Talisma” which is</p> <ul style="list-style-type: none"> • Integrated with our policy admin system for real time information • Available at every customer touch point for seamless service • Workflow with rules for allocation based on classification of requests / complaints • Multiple levels of auto escalation in case of non-resolution within specified timeline. • Every interaction with customer is stored and accessible at any given point in time for speedy and quality closure of grievances • User friendly reports to monitor trends and performance
10.	If policyholder can register his grievances online, please mention the details thereof. If not, the approximate date of its commencement.	<p>Policyholder can register grievance online through our website www.pnbmetlife.com</p> <ul style="list-style-type: none"> • Separate section of Grievance is available for ease of access • Escalation Point and Grievance Process is mentioned for quick reference • Status of Grievance can also be accessed online

11.	What are the three best practices you follow in the area of grievance redressal in your company?	<ol style="list-style-type: none"> 1. Dedicated & Specialized team for Grievance handling to manage all complaints irrespective of nature of complaint. One stop shop for all grievances addressed by process experts 2. Root Cause analysis of complaints to ascertain the gaps and eliminate the chances of reoccurrence 3. Setup of specialized, channel based service delivery team for servicing of internal as well external customers <p>Some of the Prevention steps that we take to minimize grievances</p> <ol style="list-style-type: none"> 1. Ethics & Compliance, Code of Conduct, Anti Money Laundering (AML) & Anti Corruption Policy (ACP) within 7 days of joining of employee 2. Monthly newsletter (Met World) on sales practices 3. Education series from compliance advisor on Misselling, Splitting, Anti Corruption Policy, Benefit illustration, correct sales practices
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