COMPLAINTS MANAGEMENT POLICY
AEGON Religare Life Insurance follows a philosophy of providing resolution of the customers' complaint/grievance in a manner that effectively resolves the complaint to customer's satisfaction.

The complaints management process is designed in a manner to enable providing Management Reporting and root-cause analysis to effectively address the underlying process that causes complaints and take steps to eliminate the root-cause.

Definition for complaints as defined in IRDA circular number 3/ CA/ GRV/ YPB/ 10-11 dated 27th July 2010 is adopted and the systems and process changes will be done to comply with the requirements.

Head - Audit, Risk & Compliance will be the designated Grievance Officer for the company

As prescribed in the above circular following are appointed as Designated Grievance Officer for various offices:

<table>
<thead>
<tr>
<th>AEGON Religare Office</th>
<th>Designated Grievance Officer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Corporate Office</td>
<td>Head - Audit, Risk &amp; Compliance (Principle Compliance Officer)</td>
</tr>
<tr>
<td>Branch Offices</td>
<td>Branch Head</td>
</tr>
<tr>
<td>Zonal Office</td>
<td>Zonal Operations Manager</td>
</tr>
<tr>
<td>IT &amp; Operations Center</td>
<td>Senior Manager - Servicing Operations</td>
</tr>
</tbody>
</table>

The policy will be owned by Designated Grievance Officer for the company.

The functional responsibility for compliance will vest with various functions (Operations, Customer Services, Finance, Underwriting, Claims, Legal and Sales Channel).

Policy Holder Protection Committee will monitor and ensure compliance by various functions.

**Complaints Management Procedure**

We have adopted the 7 steps process to track, primarily the precise registration of the complaint and its resolution to eliminate the very cause of complaint and ensure it does not reoccur.

Identifying and Classification of the complaint vs. query or request as per defined by the Complaints management process.

1) Complaints Intimation by customer: Customer is provided with multiple touch-point for registering complaint:
• Contact centre where the customer can call us on our toll free number 1-800-209-9090 between 8 am to 8.30 pm seven days a week to register the complaint. The telephony system is configured to give priority to such a call selection over the other existing calls in queue.

• Letters: Customers can write into us at the branch or the Head Office.

• Website: The customer can register his complaint via the complaints form available on our WEBSITE.

• Emails: Customer can write through email to customer.care@aegonreligare.com. In case of complaint is not resolved or not resolved to satisfaction customer can escalate the complaint via email to grievance.manager@aegonreligare.com. There is dedicated staff managing emails coming through grievance.manager@aegonreligare.com.

Each complaint is captured in CRM for proper tracking, closure and for reporting purpose. Please refer Annexure B for operating process followed by Customer Service Team from the time the complaint is received till the complaints is resolved and customer intimated about the same.

The complaints redressal procedure including Ombudsman contact details is advised to the customer in the policy pack that is sent upon policy issuance. The procedure is available also on the website www.aegonreligare.com

2) Complaint Identification & Classification

Complaint Classifications is instituted to understand the nature, type and the origin of the complaint. This also helps in differentiating a complaint from a query or request of the customer. A complaint is classified as per the understanding given by the customer regarding an issue. A complaint is not the decibel level of the customer or the phrases used by the customer. In case of complaint received via email or letter customer is called to understand the details of the complaints accurately.

The classification of complaints is then done as per criteria specified:

- Legal complaint/IRDA complaint: Complaints received from IRDA or where customer sends legal notice to AEGON Religare Life Insurance
- Sales complaint: Complaints received from customers where customer alleges mis-selling, fraud or forgery.
- Service complaint: Complaints received from customers where customer complaints regarding defect or non-delivery of service. E.g policy document not received, refund cheque not received, etc.
Annexure A contains the guidelines for complaints classification. Complaints categorization as prescribed by the Authority from time to time shall be adopted for complaint classification.

3) Recording the complaint: the complaint received via any 4 medium stated above with all the relevant information and classification is captured in CRM for effective tracking, closure and management. Acknowledgement will be advised to the customer in writing within 3 working days.

4) Notification: The complaint is notified to the process owners automatically through CRM upon receipt and capture in CRM. This enables efficiently closing the complaint quickly.

5) Co-ordination & Escalation - The service team co-ordinates with relevant process owners for resolution of the complaint. Escalation matrix is built in CRM for auto-escalation besides the escalation by the service team for ensuring timely response and closure of the complaint. Modification to the same will be done to comply with the IRDA requirements as prescribed from time to time.

6) Resolution - Customer will be advised in writing regarding the resolution or decline of acceptance of complaint along with reason in 2 weeks from registration of complaint. In case of unlikely event of resolution in the said period as described above, a "holding reply" is sent to the customer. Closure of the complaint is based on the specifics of the complaints. Please refer Annexure C for the Closure of various complaint categories.

The closure of the complaint will be defined as prescribed by IRDA from time to time.

7) Reporting, Prevention and Continuous Improvement -
   - MIS reports on a periodic frequency are generated for Management reporting, reporting to Policy Holder Protection Committee. This will be done by Compliance Department.
   - Basis trend analysis, the root cause analysis will be done to identify potential problems and to facilitate proactive steps to prevent the recurrence of previously identified problems. This will be driven through Policy Holder Protection Committee.
Annexure A

1) Sales
   a. Mis-selling
      i. Non-disclosure of product features/charges: This includes mis-selling about term, product feature, guaranteed returns committed, etc. Upon receipt of customer intimation via email, letter or over phone it will be classified as a complaint.
   b. Fraud and forgery: Classification process will remain same as above
      i. Forgery: When customer alleges signature forgery on any of the documents submitted for policy issuance.
      ii. Fraud: when customer alleges document tampering (supporting doc tampering e.g age proof, address proof, payment acknowledgement receipt etc).
   c. Funds given to advisor/sales team: Classified as complaints upon receipt. Customer will be asked to submit the acknowledgement of funds basis which input will be given to Audit, Risk & Compliance team for investigation and resolution.

2) Service Complaints
   a. Non-receipt of policy documents: When customer intimation regarding non-receipt of policy document received after 7 days of policy issuance date,
   b. Non-receipt of refunds: Same as above
   c. Non-receipt of servicing transaction confirmation: Same as above
   d. ECS related: When customer intimation received after 10 days of due date regarding non-debit to the account and where the customer is on ECS. Otherwise it will be follow-up

3) E-sales
   a. Document pickup not done: 2nd non-pickup intimation from the customer for the same policy will be captured as complaints
   b. Medicals appointment not kept by TPA: 2nd intimation from the customer regarding medicals not done at the appointed date and time for the same policy will be captured as complaint

4) IRDA and legal: It will be classified as complaints upon receipt.

The classification/sub-classification as maybe prescribed by IRDA will be adopted and necessary changes to the systems and processes will be done at the earliest.
Annexure B
Complaint Handling Process Flow

Start

Modes of Complaint for Branch / Customer

Call Center - free number 1-800-209-5090 from 8 am to 8.30 pm, Monday to Sunday

Letter to Branch or Head office

Emails at customercare@aeonreligare.com

CRM Case is created for all the Complaints mentioned in below three categories

Sales Complaints

Service Complaints

Legal / IRDA Complaints

A

B

C
Sales Complaints Process Flow

Start

Auto-assignment
Of case on CRM
To sales team

Capture a Case in
CRM - Sales
Complaints

Email from CRM is
send to Sales team

Yes
If the sales
reverts in T + 3
days to CS

NO

Close the CRM
Case as refund / Policy Cancellation

Letter sent to
customer

Resolution / Cancellation

HOD to decide to
Action as Refund / Cancel

Escalation Mail is
sent to HOD

HOD to decide
to keep on
hold / action

Yes
Hold

CS team to
follow up with
Sales for clarity
if clarity is rec.

No

sales to reverts
in T + 2 days to
CS

Hold Reply is sent
to the customer
Service Complaints Process Flow

Start

Auto-assignment of case in CRM to service team

Capture a Case in CRM - Service Complaints

CS Back office investigation from the systems.

Yes

If the investigation is done with in T + 3 days

NO

Close the CRM Case as refund / Policy Cancellation

Communicate The resolution to the customer

Resolution / Cancellation

Escalation Mail is sent to Process Manager

Process Manager to decide to keep on hold / action

Hold

Escalation Mail is sent to AVP if the Case is on hold till T + 5 days

AVP to decide to keep on hold / action

Hold

Escalation Mail is sent to HOD if the Case is on hold till T + 7 days

CS team / HOD / AVP to provide solution

Hold Reply is sent to the customer

End
Legal & IRDA Complaint Process

Start

- Legal / IRDA Complaints
  - Auto email to legal and CS Team
  - Capture a Case in CRM
  - CS team sends all the related docs to Legal team resp.
  - Legal team responds and response copy is sent to CS
  - With the inputs, CS team Closes the Case in CRM
  - Legal / IRDA team keeps a track and advises final court decision to CS
  - CS team creates a new case in CRM attach a response and actions for closure
  - End

- Legal / IRDA Complaints
  - Case captured in CRM
  - Audit, Risk & Compliance Team Sends the response to CS
  - Response sent To IRDA
  - CS team sends All the details to Audit, Risk & Compliance Team

Sales Process

Service Process
Process Title: Sales Complaints Resolution Process

Over-view of the Process: This process is to be followed by CS team to handle complaints on day to day basis.

<table>
<thead>
<tr>
<th>STEPS</th>
<th>ACTIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Step 1</strong></td>
<td>Capture in CRM: Compliants received at any touch-point (Service Center, via email, letter at HO or through branch) is captured into CRM by the person receiving the complaint. The complaint is understood from the customer/ letter and is captured in CRM under appropriate case reason</td>
</tr>
<tr>
<td><strong>Step 2</strong></td>
<td>By T+2, after speaking to customer an email is sent from CRM to the relevant sales team for their response to the alleged complaint. Sales team is also advised to revert within 2 days.</td>
</tr>
<tr>
<td><strong>Step 3</strong></td>
<td>Revert received from sales is then sent to Director - Customer Services &amp; New Business Operations with the snapshot of complaint and sales revert received. This is sent from CRM. In case there is no revert received from sales with 2 days, on the third day it is escalated to Director - Customer Services &amp; New Business Operations. It is escalated to channel head and/ or zonal head by Director - Customer Services &amp; New Business Operations. This is automatically captured against the complaint in CRM. Normally 2 more days are given to Sales to revert in such cases.</td>
</tr>
<tr>
<td><strong>Step 4</strong></td>
<td>Resolution is determined by input and response given by Director - Customer Services &amp; New Business Operations. This is received via email which is also automatically captured against the complaint in CRM</td>
</tr>
<tr>
<td><strong>Step 5</strong></td>
<td>Resolution is communicated to the customer. Resolution is either Refund of premiums received OR Decline of customer’s complaint giving details and reasons for the same.</td>
</tr>
<tr>
<td><strong>Step 6</strong></td>
<td>In case the customer agrees for withdrawal of complaint and continuation of the policy, such a letter is procured from the customer and forwarded to Customer Service team by sales. Customer is called by Customer Service Team to confirm with the customer regarding withdrawal of complaint. Post either of the above, the complaint is closed on CRM by Customer Service Team</td>
</tr>
</tbody>
</table>

Process Title: Service Complaints Resolution Process
### Over-view of the Process: This process is to be followed by CS team to handle complaints on day to day basis.

<table>
<thead>
<tr>
<th>STEPS</th>
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</thead>
<tbody>
<tr>
<td><strong>Step 1</strong></td>
<td>Capture in CRM: Complaints received at any touch-point (Service Center, via email, letter at HO or through branch) is captured into CRM by the person receiving the complaint. The complaint is understood from the customer/ letter and appropriately captured in CRM under appropriate case reason. The complaint is auto-assigned to service team and an auto-email is also sent to the designated service team member.</td>
</tr>
<tr>
<td><strong>Step 2</strong></td>
<td>Based on the nature of complaint, appropriate investigation is done for the policy in the system and other records, as the case maybe.</td>
</tr>
<tr>
<td><strong>Step 3</strong></td>
<td>If the complaint is not closed within 3 working days, auto-escalation of the complaint goes to the supervisor. It is sent by CRM as an email.</td>
</tr>
<tr>
<td><strong>Step 4</strong></td>
<td>The supervisor checks the status with the designated team member and also investigates to ensure resolution.</td>
</tr>
<tr>
<td><strong>Step 5</strong></td>
<td>In case the service complaints remain open for 5 working days, auto-escalation of the complaint goes to Head of Central Operations.</td>
</tr>
<tr>
<td><strong>Step 6</strong></td>
<td>In case the service complaint remains open for 7 working days, auto escalation of the complaint goes to Director - Customer Service &amp; New Business Operations.</td>
</tr>
<tr>
<td><strong>Step 7</strong></td>
<td>In case the complaint cannot be closed/ resolved in 10 working days, a “holding reply” is sent by Customer Service Team to the customer.</td>
</tr>
<tr>
<td><strong>Step 7</strong></td>
<td>The case is closed on CRM after resolution of the complaint and relevant communication to the customer as the maybe required.</td>
</tr>
</tbody>
</table>

**Process Title:** Legal Complaints Handling Process

**Over-view of the Process:** This process is to be followed by CS team

<table>
<thead>
<tr>
<th>STEPS</th>
<th>ACTIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Step 1</strong></td>
<td>Capture in CRM:</td>
</tr>
</tbody>
</table>
Legal compliant received is captured under case reason “Legal Complaints” in CRM by Service Team.

CRM sends an auto-email to the designated legal person intimating about receipt of legal complaint

<table>
<thead>
<tr>
<th>Step 2</th>
<th>Details and documents as required by legal team is provided to them by Service Team</th>
</tr>
</thead>
</table>

Step 3
Legal Team responds to the legal complaint via letter to the legal notice.

Step 4
The legal team provides copy of the response to Service Team for attaching the same in CRM.

Step 5
Service Team attaches the copy of legal team’s response in CRM and closes the case in CRM

Step 6
Legal team tracks this as a Pending legal case as per their process

Step 7
The final resolution as determined by court order is advised to service team

Step 8
Service team communicates the same to the customer and records the same in CRM.

Process Title: IRDA Complaints Handling Process

Over-view of the Process: This process is to be followed by CS team

<table>
<thead>
<tr>
<th>STEPS</th>
<th>ACTIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Capture in CRM: Complaints are received from IRDA via the Compliance Team. Those are captured in CRM under case reason “IRDA complaints” in CRM by Service Team. CRM sends an auto-email to the designated compliance person intimating about receipt of complaints</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Step 2</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>A) In case the IRDA notified complaint is already available as a complaint in CRM, the details and history of the complaints are available in CRM the same is provided to compliance team. B) In case it is a new complaint, service team follows the “Sales Complaint Handling Process” or “Service Complaint Handling Process” as the case maybe for resolution</td>
<td></td>
</tr>
</tbody>
</table>

<p>| Step 3 | Details of investigation as per Step 2 is provided to Compliance Team for response to |</p>
<table>
<thead>
<tr>
<th>Step 4</th>
<th>IRDA</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The Compliance Team responds to IRDA and provides the copy of the response to Service Team</td>
</tr>
</tbody>
</table>

| Step 5 | Service Team attaches the copy of response sent to IRDA by compliance team, in CRM and closes the case in CRM |
Annexure C

Resolutions:

<table>
<thead>
<tr>
<th>Complaint Type</th>
<th>Closure Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sales Complaints - Mis-selling</td>
<td>• Refund of the premium OR</td>
</tr>
<tr>
<td></td>
<td>• Customer being intimated in writing the reason that through investigation it has</td>
</tr>
<tr>
<td></td>
<td>been determined that it is not a mis-selling.</td>
</tr>
<tr>
<td>Sales Complaints - Fraud &amp; Forgery</td>
<td>• Same as Above</td>
</tr>
<tr>
<td>Service Complaints - Non-receipt of policy documents</td>
<td>• Issuance of duplicate policy/ refund cheques OR</td>
</tr>
<tr>
<td>or refund cheques</td>
<td>• Providing proof of delivery to the customer</td>
</tr>
<tr>
<td>Service Complaints - Non-receipt of service</td>
<td>• Duplicate copy of the confirmation letter provided to the customer</td>
</tr>
<tr>
<td>transaction confirmation</td>
<td></td>
</tr>
<tr>
<td>Service Complaints - ECS</td>
<td>• Intimation to the customer about the reason E.g ECS bounce, not sending ECS, etc OR</td>
</tr>
<tr>
<td></td>
<td>• Re-generating the ECS debit and sending to customer’s account in case failure by</td>
</tr>
<tr>
<td></td>
<td>AEGON Religare.</td>
</tr>
<tr>
<td>E-sales Document not picked up or medical</td>
<td>• Arranging and ensuring pick-up of documents or ensuring completion of medical</td>
</tr>
<tr>
<td>appointment not kept</td>
<td>appointment as the case maybe</td>
</tr>
<tr>
<td>IRDA complaints</td>
<td>• Intimation to IRDA through compliance regarding the solution provided to the</td>
</tr>
<tr>
<td></td>
<td>relevant customer for closure of complaints</td>
</tr>
<tr>
<td>Legal notice</td>
<td>• Reply sent to the notice. Thereafter it is tracked separately by Legal Team.</td>
</tr>
<tr>
<td></td>
<td>Resolution will be governed by the court order.</td>
</tr>
</tbody>
</table>