ICICI LOMBARD GENERAL INSURANCE COMPANY LIMITED

Customer Grievance Redressal Mechanism

1. Background:

The ability of the insurance industry to achieve its socio-economic objectives, and in this process bring more customers into its fold will ultimately depend on the satisfaction levels of its customers. The Company strongly believes that a satisfied customer is the most important factor in developing its business.

Customer Service is a key focus area of the Company. Customer Service Quality of the Company is a holistic approach targeting consistent improvement in customer experience and quality of operations.

All customer complaints, critical requests and issues will be handled efficiently and without bias, as they would affect the Company’s reputation and business if handled otherwise. Customer complaints provide valuable insights into the Company’s internal processes and procedures (including automated processes) that have an impact on the Company’s ability to conduct business efficiently and successfully.

The Company shall ensure that all employees are informed about the policy and its subsequent updates.

2. Objectives:

The objective of the policy is to ensure that:

- All customers are treated fairly at all times.
- All complaints, critical requests and issues raised by customers are dealt with courtesy and resolved on time.
- Customers are made completely aware of their rights so that they can opt for alternative remedies if they are not fully satisfied with our response or resolution to their complaint.

3. Customer Segments:

Segmentation of customers is done in the following ways:

- Corporate segment
  - Large Corporate
  - Small and Medium Enterprise(SME)
- Retail segments
- Government Segment
- Rural Segments
4. Approach Towards Customer Service:

a. Customer Approach: Based on the requirements, the strategy that best suits a particular segment should be adopted. For example, the approach for Rural segment needs to be local in nature, for Corporate segment the approach needs to be relationship based whereas for Retail segment it needs to be multi-channel and centralised. The guiding principles of the approach to customer service in all these segments should be as follows:

i. **Customer Education**: The Company pioneers various products and takes several initiatives. It should take necessary steps to educate the customers to reduce errors made by them.

ii. **Customer Communication**:

   o **Transparency**: The customer should be provided with information regarding the channels he can access in order to service his requirements and resolve his issues. In addition, the turn-around-time for issues to be redressed and the expectations on investigation and resolution also needs to be transparently communicated.

   o **Accessibility**: The Company's strategy is to enable customers to avail of services through multiple channels, which should provide uniform service delivery. Customers can use Branch Offices, Call Centre, Internet, e-mail and regular post for forwarding their requests, issues or complaints.

   o **Escalation**: Customer should be informed as to how he can escalate his complaint to the next level in case he is not satisfied with the resolution provided by the current level.

iii. **Customer Feedback**: Mechanisms to obtain customer feedback on a regular basis and derive actions from such feedback should be put in place to check the current level of customer service, trends over a period of time and to take appropriate steps towards meeting customer expectations.

b. Internal Approach:

i. **Resolution**: The following should be defined:

   o **Quality of resolution**: Standards of what constitutes quality resolution and what is considered as a valid closure.

   o **Responsibility for resolution**: The responsibility of resolution at every level starting from the business head.
o **Escalation**: Escalation mechanism to ensure that the issues, which are not resolved, are put up to the next level. All channels and functions should put an internal escalation mechanism in place.

Central as well as local teams within the organisation should be set-up to ensure monitoring of quality of resolution, turn-around time and adherence to the above processes.

ii. **Process Improvements**: The product teams, channels and segment units should ensure that the information on customer complaints and issues is utilised to improve processes. A root cause analysis should be done to ensure that process fixes are put in place so similar issues do not recur. Customer Service Cell, comprising of senior management officials dealing with aspects of customer service, and closed user groups and circulation of reports to senior management should be used for this purpose.

iii. **Employee training and awareness**:

o Employees form an important link in the chain of customer interaction. They may be directly dealing with the customers or indirectly, like the back office staff. Staff that is directly involved with the customers should be trained on an ongoing basis on products, services and processes of the Company. Necessary steps and training should be undertaken to build and strengthen the customer service orientation in the Company.

o Requests, critical requests and complaints should be clearly defined and understood by the employees to ensure uniformity and standardization in approach.

o Staff should be trained on the basics of handling and resolving customer issues like capturing complaints in the system deployed for the purpose and informing customers of the resolution time. The staff member resolving customer issues should be aware of the impact the resolution will have on the customer. Issues or complaints should be resolved based on the following three principles:
  - Prompt response within the stipulated time frame
  - Maximisation of customer retention at minimum cost
  - Correction of mistakes and errors quickly

iv. **Performance Management**: It is essential to emphasize the importance of customer service at all levels, share relevant information and reports and conduct self-audits of service performance. In order to ensure this, adequate weightage should be given in performance management at all levels including customer interfacing, back offices and support functions and business units.
5. Operating Structure for Customer Service:

a. Board Level Focus: The Audit & Risk Committee constituted by Board reviews Customer Service initiatives and deliberates measures for enhancing the quality of customer service and improvement in overall service levels. Customer service levels including quantitative metrics for tolerance limits are a key area of performance evaluation for the Executive Management.

b. Customer Service Cell: The Company shall have a Customer Service Cell (CSC) headed by the Head of Customer Service. Business Heads and the Heads of related departments are members of the Cell. The Cell focuses on building and strengthening customer service orientation in the Company through initiating various measures including simplifying processes for improvement in customer service levels. The Cell would hold monthly review meetings to discuss service updates, ongoing projects specifically targeted towards improvement of customer service and appropriate actions arising from discussions.

c. Complaint Compliance Officer: The Company shall have a “Complaints Compliance Officer” at the Corporate level who would be responsible for implementation of the customer service and complaint handling procedures for the Company. The Complaint Compliance Officer should also be responsible for co-ordinating resolution of complaints received from regulatory authorities.

d. Reporting requirements: Based on definitions of requests, critical requests and complaints, data should be maintained by the respective teams at a central point for reporting to senior authorities of the Company as well as to external regulatory authorities.

6. Statutory/Regulatory Compliance:

Detailed procedures for handling issues relating to customer service should be laid down separately with the approval of Customer Service Cell (as specified in section 5 (c) above). These procedures should take into account the applicable regulatory requirements including the necessity of speedy resolution of customer complaints.

The procedures should also adhere to statutory guidelines applicable to customer service.