



Universal Sampo General Insurance Co.Ltd.

UNIVERSAL SOMPO GENERAL INSURANCE COMPANY LIMITED

CUSTOMER GRIEVANCE REDRESSAL POLICY

Version	Name	Designation	Date
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CUSTOMER GRIEVANCE REDRESSAL POLICY

Policy Preamble

IT IS THE POLICY OF Universal Sampo to ensure that:

- All customers are treated fairly and promptly at all times.
- Any complaints/requests raised by customers are dealt with promptly and professionally.
- Customers are fully informed of their rights to resolution and are encouraged to seek judicial or third party opinion wherever there is any interpretational uncertainty through appropriate consumer forum or otherwise.

The customers confidence in the company is sheltered and the customers interest under the law is protected, more specifically the interest of the customer under the IRDA Protection of Policy Holder's Interest Regulation, 2002. All complaints and queries received by the company shall be treated efficiently and fairly. The complaints received by any organization with respect to its services to customers, provides an window for the organization to detect the areas in its function which requires improvement and helps the organization to enhance its efficiency resulting better customer satisfaction. The organization will work continuously bettering its services to the customers and will always work in good faith protecting the interest of the customers. The company shall also ensure that all the employees concerned are informed of the rights of the customers and the process prevalent in the company for handling complaints and queries from the customers.

Grievance Redressal: Approach and Objective

The organization shall have a dedicated team with adequate man power and infrastructure to receive, resolve and close the complaints and queries received from the customers successfully through different departmental resolution teams. The departmental resolution teams shall constitute to be parts of the central processing hubs / operations / sales and branch operation (wherever applicable).



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Functions of various Offices:

Corporate Office

- i. Framing and implementing policies on improving customer service
- ii. Ensure that the complaints are resolved completely to the satisfaction of the customers or, If the customer is not satisfied, he is advised and encouraged to seek interpretation/ clarification from the insurance ombudsmen or consumer forums.
- iii. Check for persistent issues and repair any flawed process giving rise to recurrent complaints and promptly refer the complaints to or seek assistance/advice from other departments for successful closure of customer complaints.
- iv. Coordinating with other Department at Corporate Office /Zonal Offices /Branch Offices.
- v. Collecting, compiling and analyzing data received from Zonal Offices on customer services parameters, i.e. issuance of documents, claims settlement and grievance redressal.
- vi. Submitting report on grievance matters for information of the Board.
- vii. Submitting periodical report to GIPSA/Ministry/DPG and Attending and

monitoring the re-dressal of grievance cases referred by GIPSA/IRDA/Ministry/VIP and other and to send individual case reports to the appropriate authorities, Attending review meetings convened by the GIPSA/DPG/Ministry.

viii. Holding review meeting with all Zonal Offices.

Zonal Offices

- i. To maintain "May I Help You" counter for customers care.



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- ii. To implement corporate advices for the zone on Grievance Redressal.
- iii. To co-ordinate with Head Office Complaint coordination Committee, and the Branch Offices for implementing “Protection of Policy Holder’s Interest-IRDA Regulations, 2002” and other guidelines issued on customer service indicators.
- iv. To review the progress on regular basis.
- v. To submit the necessary data quarterly to Corporate Office.
- vi. To Prioritize and facilitate time-bound redressal of grievance cases referred by IRDA/DPG/Ministry/VIPs.
- vii. To collect and analyze the monthly data from Branch Offices.
- viii. To monitor the progress on customer's grievance redressal by Branch Offices.

Branch Office

- i. To implement the “Protection of Policy Holder's Interest-IRDA Regulations, 2002” and other guidelines on Customer Services Indicators.
- ii. To ensure earliest possible redressal of grievance cases.
- iii To submit monthly report to Zonal Office.

Grievance Redressal Procedure:

As most of the complaints and grievances are related to Claims/Operations/Marketing, the Company has included all the Heads of the Departments in the Grievance Redressal Mechanism. Any customer, who wishes to approach the company with any complaint or query, is facilitated with the following modalities:



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Call Center: Customers can contact Customer Service Call Centers on local telephone numbers.

Branch: Customers can walk into any branch of the Company.

E-mail: Customers can e-mail their issues to

- grievance@universalsompo.com
- anil.d'souza@universalsompo.com
- ashwani.gaba@universalsompo.com
- bisheshwari.singh@universalsompo.com

Letters & Faxes:

Customers may send a letter to:

Any of Universal Sompo GICL offices/ Grievance Department of Corporate Office.

Universal Sompo General Insurance Company Limited

Address- Unit No 401, 4th Floor, Sangam Complex,
127, Andheri Kurla Road,
Andheri (E), Mumbai – 400059

Upon receipt the Following procedures is adopted :

i. Prioritizing :

References through DPG/Ministry/VIP/IRDA are attended on top priority basis and replies are sent through Corporate Office to the concerned authorities

ii. Registration of Complaint/Grievance:

The grievance of the policy holder received shall be registered in our Customer Interaction Management System (CIMS) module and a unique number known as Service Request (SR) will be allotted to the grievance.

As per the regulatory guidelines CIMS module is fully integrated with Integrated



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Grievance Management System (IGMS) of IRDAI wherein grievances logged in CIMS are mirrored in IGMS and IRDA Token Number is generated in real time. Similarly grievances logged at IGMS are mirrored in CIMS for registration of these grievances.

iii. Acknowledgement:

A written acknowledgement shall be sent to the complainant within 3 working days from date of receipt of grievance. In case grievance is resolved within three days, resolution letter is sent to the complainant along with the acknowledgement.

iv. Referring to concerned office/officer :

The copies of acknowledgment together with the photocopy of the complaint are marked to the concerned office/ officer for redressal and to report in the prescribed format.

v .Information to controlling office:

Observations on the complaint/grievance are reported to controlling office for advice.

vi. Time bound settlement:

In respect of grievances not resolved within 3 working days the same will be resolved within 2 weeks of its receipt and USGIC will arrange to forward the final resolution letter to the complainant on the date of resolution. Various TATs for resolution of complaints are defined as guidelines are mentioned in annexure 2 attached.

vii. Grievance satisfaction and closure:

The resolution letter will redress or reject the grievance and the reasons for the same will be advised to the client. The complainant will also be advised that if no escalation is received from the complainant within 8 weeks from the date of receipt of response from USGIC the grievance will be treated as closed.



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Grievances

A "Grievance/Complaint" is defined as any communication that expresses 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.

- All letters/e-mails expressing dissatisfaction written to the senior management of the company, IRDA, Ombudsman, Consumer Forum, external agents.
- Letters / e mails/ calls received by the Customer Support, where the customer mentions: That it is a repeat (two or more) contact for service fulfillment not met satisfactorily earlier. Unprofessional handling of customer queries or complaints at the first stage.

Grievances- Methods of Handling:

1. Repudiation /quantum disputes of claim:

- i. Complaints of claims against repudiation or regarding quantum are given special attention. In both these cases claim files are submitted to higher authorities for reviewing the earlier decision. On review if the complaint is found to be genuine and valid, then the decision of the reviewing authority is compiled with. In case, the reviewing authority upholds the earlier decision the same is suitably communicated to the complainant.
- ii. In case the complaint is against the decision of the reviewing authority and if there is scope left for reviewing at a higher level than a fresh review is undertaken by an officer having higher financial authority and final decision is implemented suitably informing the complainant.

2.Consumer Forum/ Ombudsman / court cases :

Sub-judice grievances/complaints referred to Consumer Forum/ Ombudsman/ any other Court of law are out of preview of the Grievance Cell.

3.Non-compliance of Court Awards:



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Usually Court Awards are honored at respective places by our local offices barring the cases where our legal advisors advise for challenging the award in upper court of law.

4.Complaints /Grievances of Vigilance Aspect :

Complaints of above nature involving our offices/ employees are referred to our Vigilance Department. Such complaints are redressed only after necessary clearance from the Vigilance Department.

5. Non compliance of the requirements:

When even after sending letters, telephone calls or establishing personal contacts the complainant does not respond, a registered A/D letter is sent giving an opportunity to the complainant to comply with the requirements within stipulated time. Even after that if the requirements are not complied with, the grievance is closed under information to complainant.

Areas of improvement:

A telephone call is made to the customer within 24 hours of the complaint being received, apprising the complainant about the received of the complaint and status thereof. The turn-around-time for the resolution of a complaint is 4 working days for escalated cases and 15 working days for cases which need retrieval of documents and exceptionally old records. Time to time status update should be made to the customer till the time the complaint is fully resolved.

Legal notices and complaints through IRDA, Ombudsmen and Consumer forums All complaints received from the IRDA/ Ombudsmen/ Consumer forum shall be immediately forwarded to the head office at Mumbai addressed to the concerned officer of the Legal department, which shall be responsible for follow up and resolution of the complaint. The legal department shall analyze the complaint and would seek queries or issue instructions for specific resolution to concerned teams such as sales, underwriting, operations, claims etc. for resolution. In the event of delay in resolution of the complaint the concern departments should provide periodic update on the status to the legal department for effective co-ordination between legal department and the

IRDA/Ombudsman/ Consumer Forum. On the basis of their analysis and approach made towards resolution of the complaint, the Legal department shall draft and send a suitable reply to the appropriate forum through which the complaint has been received.



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Resolvable complaints should be resolved by the Legal department within a period of 10 working days.

Complaints from external agents/channels: All complaints received from external agencies such as TPA/ Agents are routed through the customer support channels as above.

Escalation Policy:

Internal Escalation

The Company shall have a customer complaint escalation process, which shall clearly mention when the customer issue needs to be escalated and the level of escalation to ensure that the customer's issue is resolved within the specified turn-around-time.

Escalation for Customers

In case, any customer is not satisfied with the resolution provided through the given mechanism, the customer can approach the company through the Grievance redressal matrix. The matrix be prominently displayed at all the branches and on the website of the company. If the customer's issue is not resolved, the complainant customer can escalate the grievances to the following officials:

Categorization of Grievances

Grievances are categorized as prescribed by the regulatory authority from time to time and the same will be incorporated in the system. Categorization of the same is as per Annexure 2 attached.



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Name Escalation level Contact number at Zonal Offices:

Zonal Office	Name of Officer Designation	Email ID	Tel. Number	Fax. Number
NOIDA - I	Mr. Rudra Deva	rudra.deva@universalsompo.com	0120-6790101	0120-6790079
RAJASTHAN - II	Mr. Praveen Seskaria	praveen.seksaria@universalsompo.com	0141-4028558	0141-4028558
MADHYA PRADESH - III	Mr. Vivek Gambhir	vivek.gambhir@universalsompo.com	0755-4027917	022-29211844
MAHARASTHRA – IV	Mr. Pradeep Kumar Singh	pradeep.singh@universalsompo.com	022-61055709	022-29211844
VARANASI - V	Mr. Harish Prasad Gairola	harish.gairola@universalsompo.com	0542-2280681	0542-2280682
ORISSA - VI	Mr. Santanu Maity	santanu.maity@universalsompo.com	0674-2435144	022-29211844
KARNATAKA - VII	Mr. C Joseph	c.joseph@universalsompo.com	080-49253133	022-29211844
ANDHRA PRAHESH - VIII	Mr. Ajaya Kumar Pilli	ajaya.pilli@universalsompo.com	040-66227224	022-29211844
GUJARAT - IX	Mr. Dilbaag Singh Khera	dilbaag.khera@universalsompo.com	079-30482070	022-29211844
TAMIL NADU – X	Mr. J S Jagathesan	jjagathesan@universalsompo.com	044-42975019	044-42975050
GURGAON - XI	Mr. Atul Duggal	atul.duggal@universalsompo.com	0124-4728800	0124-4728899
WEST BENGAL -XII	Mr. Prosenjit Chowdhury	prosenjit.chowdhury@universalsompo.com	033-30202791	033-30202791
LUCKNOW - XIII	Mr. Arvind Yadav	arvind.yadav@universalsompo.com	0522-3016789	0522-3991070
MAHARASTHRA 2 - XIV	Mr. Atul Tandon	atul.tandon@universalsompo.com	020-41212222	022-29211844
KERALA - XV	Mr. Rajendran S	rajendran.s@universalsompo.com	0484-4054485	022-29211844
PUNJAB – XVI	Mr. Amrish Kumar Singh	amrish.singh@universalsompo.com	0172-4933700	022-29211844
PATNA - XVII	Mr. Arvind Thakur	arvind.thakur@universalsompo.com	0621-3206533	022-29211844

Further escalation can be made at Corporate Office on Name Escalation level Contact number Email id as below;

Handling Grievance Cell at H.O. Level:			
Name	Designation	Direct Tel.	Email
Mr. Anil D'souza	Head – Customer Services	22-39171375	anil.d'souza@universalsompo.com
Mr. Ashwani Gaba	Head- Claims	22-39136846	ashwani.gaba@universalsompo.com
Mr. Bisheshwari Singh	CMO & Chief Grievance Redressal Officer	22-29211814	bisheshwari.singh@universalsompo.com



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PROPOSED GRIEVANCE REDRESSAL MECHANISM

- i. We propose to start alternate e-channel service mechanism for customer services including redressing grievances and complaints.
- ii. Prospects will be able to log in for seeking all type of consumer related information. They will also be able to register their complaint.
- iii. There will be automatic response with complaint number, brief of the complaint, name, address and contact number of the official taking care of the complaint.
- iv. There will be inbuilt arrangement of automatic reference to concerned office and official.
- v. The redressal of grievance /complaint shall be as per fixed time schedule.
- vi. Software will take care of generating various statistics.

Management Note to take care of Resolution of Grievances under Consumer Protection Act:

The following are the areas of necessary attention:

1) Proposal form and the Policy:

- i. The proposal form has to be properly filled in and all the pros & cons of the intended policy, subject matter of insurance, to be examined in initial stage.
- ii. Terms, conditions, endorsements, warranties etc in the policy to be properly apprised to the proposer / insured.
- iii. A copy of the proposal form is required to be given to the insured along with the policy.

2) Premium:

- i. The premium calculation in respect of policy is required to be done correctly and appropriately.
- ii. Incorrect calculation, short charging/overcharging of the premium amounts to deficiency in service.
- iii. Collection of premium should be in compliance of section 64 VB of insurance Act 1938.
- iv. Collection of the differential premium from the settled amount also amounts to deficiency in service, which is to be avoided.
- v. There should not be any delay in issuance of the policy ,after receipt and acceptance.



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3) Response to Insured:

- i. During the subsistence of the policy if any query or clarification is required by the insured it is required to be responded promptly and appropriately as non response also attracts deficiency in services.
- ii. Any change in the policy terms , during currency of the policy are to be intimated.

4) Claims:

- i. On receipt of claims, arising out of policy, the same has to be properly examined with due diligence and application of mind.
- ii. Surveyors and investigators wherever necessary, are to be appointed promptly and there should be proper follow up action, for timely submission of the report.
- iii. Appointment of more than one surveyor totally to be avoided. In case of any special circumstances requiring such appointment, matter must be referred to Corporate Office.
- iv. On receipt of the report, the same should be examined /analyzed ,in relation to other documents and prompt decision to be taken.
- v. In relation to the settlement of the claim, the details of the arrived amount, has to be intimated to the claimant and specifically where there is difference between the claimed amount and the arrived amount, specific reasons to be stated in respect of the arrived amount, unless the insured has consented to the surveyor's assessment and that is the amount offered for the settlement.
- vi. In case of infirmities observed in the claim, necessitating consideration for repudiation ,the same should be brought to the notice of insured, for his comments within a time of 15 days.
- vii. Repudiation letter is required to be sent, detailing the grounds of repudiation, within a reasonable time period and there should not be any undue delay.
- viii. The repudiation letter should be speaking and reasoned communication of the decision, along with the detailed grounds.



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THE APPROACH FOLLOWED IN RESOLUTION OF THE GRIEVANCE UNDER CONSUMER PROTECTION ACT

Universal Sampo General Insurance Company Limited adopts a customer friendly approach towards redressal of customer grievance. The customer queries and grievance are accorded utmost priority and are handled in a fair and transparent manner. The customer queries and grievance received by the Company are handled by specialized department comprising of trained personnel who dedicatedly attend to the grievance of the customers and Endeavour to resolve the same to the satisfaction of the customer.

While addressing to the grievance of the customers, many a times the company arrives at an interpretational impasse where it encourages the customers to seek opinions from ombudsmen or consumer forums through a complaint. It has been observed that the customers approaching consumer forums are more for claim related grievances than grievances related to policy services issues. Other than the customers who are encouraged by the company to approach the consumer forums for seeking independent judicial opinion on the issues, there are also a set of customers who approach consumer and other judicial forums with an expectation more than their entitlement under the contract of insurance.

When a matter is placed before a consumer forum, the company tenders its utmost cooperation to enable the court to arrive at an expeditious adjudication on the subject. The company, consequent to receipt of an opinion from a consumer forum duly honors it and preserves the same to address similar situations in the future. However, in the cases where the complainants approach to the consumer forums is misplaced and is only resultant of the customer's inordinate expectations, the company puts forward a strong contest and prevents unjust enrichment of the malafide litigants.

The company has inculcated adequate sensitization amongst its officers and representatives that policy holder's money held by the company in trust should only be utilized for claims which are judicious, righteous and appropriate.

OMBUDSMAN WITHIN THE GRIEVANCE REDRESSAL MECHANISM OF IRDA

The term Ombudsman, derives its meaning from the old Swedish term "ombudsman" ('accusative' who is an independent, informed public representative capable of adjudicating disputes), which emphasise on independence and subjective knowledge of



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the person acting as an adjudicator of public disputes with respect to the given subject. In India, the phenomenon of Ombudsman is derived from the concept of 'Lokpal' or 'Lokayukta' as recommended by the Administrative Reforms Commission (ARC) in the year 1966. 'Lokpal' and 'Lokayukta' are administrative and adjudicative procedures, based upon the concepts of "Justice at doorstep" and "Informed adjudication". Insurance Ombudsman is the first such system of specialized grievance adjudication system in India in the name of "Ombudsman". The institution of Insurance Ombudsman is governed by the Redressal of Public Grievance Rules, 1998 (RPG Rules) framed by virtue of the powers vested upon the Government of India under section 114(1). of the Insurance Act, 1938 (4 of 1938). All necessary steps will be obtained to follow and adhere to the guidelines and regulations drafted and circulated by Ombudsman.

CONSUMER AWARENESS AND EDUCATION

One of the basic reasons attributable for the low market penetration of general insurance is public awareness. Apart from market penetration, the low public awareness amongst the insured public gives rise to more customer grievances. In addition, diversity and intricacies of general insurance products and processes further complicates the scenario. All these reasons collectively make a strong cause for general insurers to make efforts to increase public wisdom and awareness about insurance vis-à-vis insurance products and processes. In its attempt to increase public awareness about insurance, the company has recognized that public media being the common and most effective source for public information and awareness, it would be an appropriate beginning to make the public media aware of the facts of insurance.

Multilingual advertisement of promotion and education to Public on customer grievance mechanism.

Eg: are DNA, Times of India and Financial Express. · Amongst the electronic media, the TV channels that have participated in the workshops so far are CNBC Awaz, UTVi, News 24, and Star Maaza.

APPLICATION OF CODE OF CONDUCT AGREED BY GENERAL INSURERS

The company abides by the code of conduct agreed by General insurers in October, 2007



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ANNEXURE 1 **28th July, 2010**

To

All Life & General Insurers

Reg: Grievance Redressal Guidelines

Please find enclosed [Grievance Redressal Guidelines](#) issued by the Authority. These guidelines are applicable for all Life and General Insurance Companies. The guidelines shall be implemented with effect from 1 st August, 2010.

As regards modifications in your systems to reflect the various [categories of classification prescribed](#) and setting of the required turnaround time, the same shall be carried out by insurance companies within 4 weeks of receipt of the circular.

Please acknowledge and confirm action taken.

(A. Giridhar)
Executive Director

ANNEXURE 2

As prescribed by the regulator, the grievance management has been classified and categorized further by incorporating the appropriate departments. Onus have been assigned to ensure a faster resolutions to the end customer.