AVIVA LIFE INSURANCE LIMITED

GRIEVANCE REDRESSAL POLICY

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1. Introduction

Timely redressal of grievances is crucial for enhancing customer confidence in the insurance industry. The grievance redressal mechanism and compliance requirements for insurers are stipulated in the IRDAI (Protection of Policyholders' Interests, Operations and Allied Matters of Insurers) Regulations, 2024, alongside the IRDAI Master Circular on Operations and Allied Matters of Insurers 2024 and IRDAI Master Circular on Protection of Policyholders' Interests, 2024.

In response, Aviva Life has decided to establish an effective and robust grievance redressal system. This shall include enabling online submission of grievances, establishing mechanisms to register all grievances received through various channels such as the call center of Aviva Life, and implementing Internal Ombudsman Schemes. The Company shall also undertake extensive publicity of these arrangements.

In the light of the aforementioned statutory provisions and obligations, this policy has been formulated.

2. Definitions

The following terms for the purpose of this policy shall carry the meaning as mentioned below:

2.1 "Authority" or "IRDAI"	Authority or IRDAI shall mean the Insurance Regulatory and Development Authority of India established under sub-section 1 of Section 3 of the IRDA Act 1999.
2.2 "Board"	Board shall mean the Board of Directors of Aviva Life Insurance Limited.
2.3 "Company"	Company shall mean Aviva Life Insurance Limited.
2.4 "Complaint" or "Grievance"	Complaint or Grievance shall mean written expression (includes communication in the form of electronic mail or voice-based electronic scripts) of dissatisfaction by a complainant with respect to solicitation or sale or purchase of an insurance policy or services related by insurers and/or by Distribution Channel.
2.5 "Complainant"	Complainant shall include a policyholder or prospect or nominee or assignee or any beneficiary of any insurance policy who has filed a complaint or grievance against the company and /or distribution channel of the Company.
2.5 "PPGR&CM"	PPGR&CM Committee shall mean Policyholder Protection, Grievance Redressal and Claims monitoring Committee as specified under the IRDAI Master Circular on Corporate Governance, 2024.

3. Applicability

This Policy shall be applicable to all the policyholders of the Company, or prospect or nominee or assignee or any beneficiary of any life insurance policy of the Company.

4. Obligations of the Company under this Policy

The Company shall:

4.1 have an appropriate system, including IT systems, and a procedure for receiving, registering and disposing of grievances in each of its offices. The Company shall publicize its grievance redressal procedure and ensure that it is specifically made available on its website;

4.2 implement a technology-based, robust mechanism for addressing policyholder grievances. This system should ensure efficient and speedy resolution and aim towards achieving ‘zero grievances.

4.3 maintain regular interaction with customers through user-friendly processes. This includes conducting awareness campaigns and providing a platform for submitting grievances online.

4.4 strengthen its grievance resolution processes by incorporating an internal escalation matrix. If grievance is not resolved at the first level, it shall be escalated appropriately.

4.5 have in place robust procedures and effective mechanisms to resolve grievances of policyholders and/or claimants efficiently, effectively and in a timely manner;

4.6 not prohibit, bar or discourage any policyholder or claimant from lodging any grievance to the Authority;

4.7 establish adequate Grievance Redressal Procedure in accordance with the prevalent regulatory prescriptions;

4.8 widely publish the availability of option to the complainant for taking up grievance with Insurance Ombudsman, in case the grievance is not resolved to the satisfaction of the complainant;

4.9 ensure that this infrastructure includes functionality to identify and manage unrelated or unidentifiable complaints that may be sourced by fraudsters;

4.10 ensure that the Policy Conditions shall inter-alia include the conditions for Grievance Redressal;

4.11 comply with the award of the Insurance Ombudsman within 30 days of receipt of award;

4.12 Ensure that the following details, inter-alia are included in the Life Insurance Policy-

4.12.1 Internal Grievance Redressal Mechanism procedure of the Company.

4.12.2 address and contact details of Insurance Ombudsman within whose territorial jurisdiction the branch or office of the Company or the residential address or place of residence of the policyholder is located.

5. Grievance redressal procedures

5.1 The Company has a robust customer relationship management system for receiving, registering and disposing Grievances. The Company also has in place systems to receive and deal with all kinds of calls, including voice/e-mail relating to Grievances from Complainants. The Company has a system in place to obtain customers’ feedback on a regular basis, post-resolution of Grievance(s) to garner feedback on experience with the Grievance redressal process and the level of their satisfaction

5.2 Grievance acknowledgement: On receipt of a Grievance, the Company will send an acknowledgement, through email (as available) or dispatch a letter, to the Complainant immediatelyGrievance resolution: The Company will resolve the Grievance within 14 days (or as may be specified by the Authority from time to time) of its registration and each redressal or rejection of the issue will be conveyed vide email or letter, along with reasons. Such communication will also inform the Complainant about how they can pursue the Grievance, if dissatisfied with the resolution provided. The company will provide details of ombudsman basis customer's location and the link is https://www.cioins.co.in/Ombudsman The Company will endeavor to resolve all Grievances to the satisfaction of the Complainant. As per Regulations, a Grievance shall be considered as disposed of and closed when:

5.3 The Company has acceded to the request of the Complainant fully when either of the below conditions are fulfilled:

• The Complainant has indicated in writing, acceptance of the response of the Company, • The Complainant has not responded to the Company within 8 weeks of the Company's written response to the Grievance..

6. Lodging of Complaints

6.1 The company's customer service strategy is to enable its customers to avail its services through multiple channels. The head office and each branch office of the Company have a well-defined process for receiving and registering Grievances. Requisite systems are in place to receive, record and address the same at all the touchpoints. Customers may use any of the following avenues to report Grievances to the Company

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• Branch office: Contact the customer service executive or write to the Grievance Officer at our branch offices, explaining the details of the issue concerned.

• Company website & email contact: Visit us at https://www.avivaindia.com/or write to us at complaints@avivaindia.com

• Helpline Number: 1800-103-7766

• Head office: Customers can also address their Grievance to the below-mentioned address:- Customer Grievance Redressal Unit 401-A, 4th Floor, Block A, DLF Cyber Park, Sector-20, NH-8, Gurugram, Haryana-122 016, India

6.4The Company shall allow policyholders or claimants to register complaints online through Bima Bharosa portal at https://bimabharosa.irdai.gov.in/ of the Authority.

6.5The Company shall integrate its grievance portal with the Bima Bharosa portal to enable online registration and tracking of grievances. The system of the Company shall include real-time mirroring functionality to ensure that its grievance database is consistently synchronized with the Bima Bharosa portal.

7. Other Obligations of the Company

7.1 The Company shall implement a system to regularly gather customer feedback, especially after resolving grievances. This feedback should cover policyholders' experiences with the grievance redressal process and their satisfaction levels.

7.2 The Company shall include contact details of relevant Insurance Ombudsmen in its resolution communications, allowing policyholders to escalate complaints if they are dissatisfied with the grievance resolution by the Company.

7.3 The Company shall integrate its grievance portal with the Bima Bharosa portal to enable policyholders to register and track grievances online. The system shall include real-time mirroring to ensure synchronization of its grievance database with Bima Bharosa.

7.4 The Company shall record grievances received from prospects and policyholders through various channels (such as telephone calls, emails, physical posts, in-person complaints) on the Bima Bharosa platform.

7.5 The Company shall establish an Internal Ombudsman Scheme

7.6 The Company shall appoint a designated officer at every business location to handle grievances, along with a clear internal escalation matrix for unresolved complaints. Details of the grievance redressal mechanism shall be prominently displayed on the website of the Company and in all its offices.

7.7 The Company shall prominently display the name, address, and contact details of the insurance ombudsman within the jurisdiction of each of their offices.

8. Turnaround time of Grievance Redressal

The company shall have the following timeline for grievance resolution:

Activity	Timeline
Written acknowledgement of grievance to a complainant	Immediately
Seek and obtain further details, if any, from the complainant (permitted only once)	One Week
Action on complaint and intimation of decision to the complainant	Two Weeks
Resolution of grievance and issue of final letter of resolution	Two weeks
If a complaint is not resolved, communicate the details to the Policyholder of options including referring the complainant to Insurance Ombudsman/Consumer Court	Two weeks (from original date of receipt of complaint)
Closure of grievance on non-receipt of reply from the complainant	Eight weeks

9. Review of the Policy

The PPGR&CM Committee and the Board shall review the Policy:

9.1 At least once every financial year, or

9.2 As and when the PPGR&CM and/or the Board considers it appropriate, or

9.3 As and when the underlying laws governing this Framework undergo any change.

10.Grievance Redressal Officers.

1. Grievance Officer (GRO) from Senior Management level who certifies that the Customer Redressal desk has discharged its contractual, statutory and regulatory obligations and therefore approves the closure of the complaint. This officer is of Senior Management level which will be appointed by the Board from time to time and will report to the Board with regard to Grievance redressal issues

2. We have an official Complaint Redressal Officer (CRO) as company's representative. It is the responsibility of the CRO to ensure that internal machinery for handling complaints/grievances operates smoothly and efficiently at all levels. The CRO is responsible for prompt redressal of complaints and improvement of customer service levels. This officer is from middle management and reports the functioning of the grievance mechanism to GRO

3. Every Branch has Local Grievance Redressal Officers whose responsibility is as under.

    - Take the Complaint from the customer
    - Understand the Query
    - 100% check of all the documents required to be submitted by the customer
    - Explain to the customer the complete grievance redressal procedure and TAT's. (Inform complainant that our systems are in place to receive and deal with all kinds of calls including voice/e- mail, relating to grievances, from prospects and policyholders

11 Escalation Matrix

The centralized team is stationed at 401-A, 4th Floor, Block A, DLF Cyber Park, Sector-20, NH- 8, Gurugram, Haryana – 122016

Level	Name	Email id	Designation	Contact no.
Level 1	-	complaints@avivaindia.com	-	0124-270-9000
Level 2	Anshu Bahl	cro@avivaindia.com	Complaint Redressal Officer	0124-270-9000
Level 3	Aneela Sinha	gro@avivaindia.com	Grievance Redressal Officer	9999346907

Complaint is categorized in two Severities:

Severity 1 - Complaints received through different source of communication (Email, Voice, Letter or visit at any touch point)

Severity 2 - Complaint escalated to MD, Board, Aviva PLVC and IRDAI