

SAFL

Sustainable Agro-commercial Finance Ltd.

Grievance Redressal Policy

Document Contact

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Approved	Policy approved by the Board of Directors at the meeting held on 23rd August 2024

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Introduction:

1. SAFL is in the business of offering lending solutions to borrowers under agricultural loans, MSME loans and Retail and Micro LAP loans. One of the mandatory requirements for disbursing loans is obtaining the life insurance policy of the borrower and endorsing it to SAFL, for covering SAFL loan recovery in case of any eventualities.

2. SAFL has applied for Corporate Agency License for Insurance business. Under the IRDAI (Insurance Regulatory and Development Authority of India) Regulation for Protection of Policyholders Interest, 2017, IRDAI aims to achieve the following objectives:
   - To ensure fair treatment of prospects at the stage of solicitation and sale of insurance policies.
   - To ensure that the interests of policyholders are protected, and that the conduct of the insurer and its distribution channel are not prejudicial to the interests of policyholders.

   SAFL has to therefore put in place an internal grievance redressal mechanism called Grievance Redressal Policy to ensure effective and timely resolution of policyholders' concerns. This is in line with the guidelines issued by IRDAI from time to time.
   - The redressal will be based on the circumstantial evidence provided by the customer and those available with SAFL to make a fair decision without any prejudice to existing customers and other stakeholders.
   - The redressal aims to provide timely resolution to SAFL's customers through a detailed root cause analysis and in turn, ensure customer retention and satisfaction.

Scope of Policy:

3. The Grievance Redressal Policy shall cover grievances/complaints received from customers /policy owners relating to insurance policies on their own lives or in the capacity of an owner of a policy. The Policy specifically excludes Query, Requests or Escalated Requests. The policy will not entertain complaints from intermediaries, agencies, and other organizations on behalf of the customer unless legally authorized by the customer.

4. Grievances received through consumer forums, courts, ombudsman's office, any judicial forum and legal notices shall be separately handled by SAFL's Legal/ relevant department. Exceptions would be entertained on a case-to-case basis.

Classification of Complaint (Grievance, Request, Escalated Request and Query):

5. SAFL has classified the nature of complaints as under:

   - **Complaint/ Grievance**

   A Grievance 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 e.g. Corporate Agency or asks for remedial action wherein Service would be defined as per SAFL's internal service policies.

   - **Request**

   Any communication from a customer soliciting a service such as a change or modification in the policy and or any communication seeking clarity on the outcome of a process/ changes brought about in a policy due to regulations/ business philosophy.

- **Escalated Request**

At times customer may require exceptional handling. These transactions expected from the Company would have however been fulfilled as per regulatory guidelines and in accordance with the Company's internal processes. These would be categorized as "Escalated Requests" for re-execution/examination of the transaction/ request.

- **Query**

Any communication from a customer for the primary purpose of requesting information about a company and/or its services.

Procedure to register a complaint:

6. The Grievance Redressal Guidelines incorporated by SAFL are applicable for resolution of any grievances or complaints. These complaints may be received either at the branch, Zonal Office, Registered Office or Head Office through any of the following ways:

• Written letter duly signed by the policyholder/borrower at any SAFL branch. The branch address is available on our website www.safl.in.

• Email from the registered id of the policyholder/borrower at insurance.grievance@safl.in.

• Complaint registered by policyholder/ borrower on SAFL website.

There would be a nominated Grievance Redressal Officer at the Head Office to address the customer's complaint.

Complaint Resolution Process

7. SAFL will ensure that the following processes are followed:

• SAFL will issue an acknowledgement letter/email to the customer within 3 working days of the receipt of a complaint.

• The acknowledgement sent to the customer will carry the details of the complaint no., the policy no. and the Grievance Redressal Officer's name who will be handling the complaint of the customer.

• If the customer's complaint is addressed within 3 days, the final communication will also act as the acknowledgment of the complaint.

• All grievances received by SAFL will be responded to with the final decision of SAFL within the prescribed regulatory Turn Around Time (TAT) of 15 days

• In the event of failure to comply with the aforesaid timelines, the customer shall be informed accordingly.

• Written request or email from the registered email id is mandatory.

• If required, SAFL will undertake complaints investigation by taking inputs from the customer over telephone or personal meetings.

• SAFL reserves the right to record calls made to customers and produce the same as evidence in the event of a dispute/ litigation. There is no obligation on SAFL to share these call recordings with customers.

Complaint re-opening process:

- In case the customer is not satisfied with the decision, the customer can approach any of the touch points mentioned in the document within 8 weeks of the receipt of our communication (failing which, we will consider the complaint to be satisfactorily closed.)
- In the event of customer coming back within eight weeks, the original 'grievance' interaction will be reopened for review of the earlier decision. Post reviewing all the facts, suitable decision will be provided to the customer as per SAFL's Grievance Redressal policy.
- SAFL will review the decision on a complaint reopened maximum twice, subject to discretion, post which the same can be treated as adequately addressed.
- The complaint can also be reopened in instances where requirements which were called from the customer have been received. Alternatively, the grievance may be reopened if the customer provides fresh evidence / additional requirements to support his stand.

Closure/Disposal of Complaint

8. Complaint will be considered as closed if any of the below mentioned scenarios are met:

   • SAFL has acceded to the request of the complainant fully

   • Complainant has indicated in writing, acceptance of the decision of the insurer

   • If no reply is received from the customer within 8 weeks of response then the complaint will be disposed as per the guidelines laid down by the Authority.

   • Grievance Redressal Officer has certified that the Company has discharged its contractual, statutory and regulatory obligations

Escalation Matrix

9. The following is the escalation matrix in case there is no response to a grievance within the prescribed timelines
   1st level of escalation: Branch Manager/ AZM/DZM - 10 working days
   2nd level of escalation (for response not received from Level 1): Head Risk or Head Legal and above – 7 working days.

   The highest level of escalation that the customer can make is the Insurance Ombudsman. The detailed address of the Insurance Ombudsman is mentioned in the policy bond given to the customer and is also available in our website www.safl.in.

   * This policy will be reviewed and placed before the board for approval as and when changes are done necessitated by internal or regulatory policies and/or guidelines.

Integrated Grievance Management System (IGMS) – Insurance Regulatory Development Authority:

10. If the policyholder/borrower still remains dissatisfied with the resolution, he/she may approach the Grievance Cell of Insurance Regulatory and Development Authority (IRDA). Policyholder may approach IRDA through any of the below modes;
    - IRDA grievance call centre (IGCC)
    - Register the complaint online on IGMS
    - Write/fax a complaint at registered address of IRDA

Insurance Ombudsman:

11. If the policyholder is still not satisfied with the response or resolution provided by the Company, he/she can write to Insurance Ombudsman. The detailed addresses and contact details of the Insurance Ombudsman, set up across various locations in the country, are provided to the policyholders in their policy document and are also to be made available on SAFL website.