

Complaints & Grievance Redressal Policy

Document Control

Title	Complaints & Grievance Redressal Policy
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Version Control

Date	Version	Updated by	Description of changes
20 th - September 2013	1.0	K.V. Natarajan	Initial Issue
10 th - June 2016	1.1	Girish Mantri	Incorporated new logo.
3 rd October 2020	1.2	Spriha Lohani	Incorporated New colour Logo
06 - October 2023	1.3	Dheeraj Singh	Incorporated New Logo

Approvals

Name	Position	Version	Date
Praveen Vashishta	CEO & Managing Director	1.0	20.09.2013

Distribution List

Name	Position
All Employees	All Employees at Howden India

Howden Insurance Brokers India Pvt. Ltd.

6th Floor, Peninsula Chambers,
Peninsula Corporate Park,
Ganpatrao Kadam Marg, Lower Parel
Mumbai – 400013

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1. Background

Howden India is committed to provide a prompt and efficient response to all its client's insurance needs. In case of client dissatisfaction with any aspect of our services, Howden India endeavors to ensure that the matter is investigated quickly and independently and to remedy any shortcomings as soon as possible.

2. What is a Complaint?

A complaint is any oral or written expression of dissatisfaction, whether justified or not, from or on behalf of any complainant about our provision of or failure to provide a financial service.

3. Lodging of Complaint

The complainant can lodge complaint / grievance through any of the following means

- ✓ Phone 022 66558811
- ✓ Fax 022 66548833
- ✓ Email : grievances@howdenindia.com
- ✓ In writing : Complaints Officer
Howden Insurance Brokers India Pvt. Ltd.
6th Floor, Peninsula Chambers, Peninsula Corporate Park
Ganpatrao Kadam Marg, Lower Parel
Mumbai, Maharashtra - 400013

In case of an oral communication, Howden India employees are required to identify communications which constitute a complaint.

In case of uncertainty, employees should

- ✓ clarify the potential complainant's intent by further questioning; and if necessary
- ✓ ask the potential complainant whether the matter is to be treated as a complaint; or
- ✓ seek guidance from Compliance Officer

Howden India may contact the complainant to seek additional information to better resolve the complaint.

4. Handling Complaints

The Compliance Department:-

- a) checks the accuracy of the information provided then updates the complaints register
- b) evaluates, if possible, whether the complainant has a valid grievance
- c) determines if it is possible / appropriate to make an immediate final response to the complaint; and if so
- d) proceeds to make a final response as detailed below; or
- e) appoints an independent Complaint Handler to investigate the grievance (which may be the individual responsible for Compliance)
- f) issues a written response to the complainant, including details of the grievance, confirming receipt of the complaint within **five working days**
- g) details in the written response who the Complaint Handler is
- h) issues a copy of our client complaints policy

5. Referring Complaints

Where the subject matter of the complaint is, either in whole or in part, the fault of another party, the Compliance Department also:

- a) determines whether all or part of the complaint should be referred to another party
- b) makes that referral in writing to the party concerned
- c) writes to the complainant explaining the reasons for and to whom we are making the referral

within **five working days** of discovering the need to refer the complaint.

6. Errors & Omissions

Prior to passing the complaint over for investigation, the Compliance Department determines if the subject matter of the complaint indicates a potential errors and omissions claim. In such a case, the CEO should be informed and if necessary consider appropriate extra supervision. The Errors and Omissions procedure must also be instigated.

7. Complaint Investigation

The Complaint Handler within **8 calendar weeks** of receipt of the original complaint.

- a) investigates all circumstances of the grievance; and
- b) makes a determination regarding Howden India's role in said grievance; and
- c) decides whether to accept or reject all or part of the complaint; and
- d) where necessary, determines appropriate redress; or
- e) obtains approval for their recommended appropriate redress; and
- f) sends a written final response to the complainant; or
- g) writes to the complainant explaining the reasons for any delay; and
- h) details a timetable for providing a final response;

8. Appropriate Redress

Appropriate redress need not be financial. In most cases a detailed explanation of the circumstances leading to the grievance coupled with an apology is sufficient. Where the complainant has suffered distress, detriment or financial loss, appropriate compensation will be considered. Where a complaint is justified, corrective action is taken, where possible.

9. Final Response

The Complaint Handler issues a final response to the complainant which will either:-

- a) reject the complaint as invalid in which case explain the reasoning which has led to this determination
- b) accept the complaint as valid in which case explain the reasoning which has led to this determination.