



FAIRFIRST CUSTOMER FEEDBACK GRIEVANCE MANAGEMENT POLICY

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TABLE OF CONTENTS

| | | |
|------------|------------------------------------|-----------|
| 01. | Introduction | 02 |
| 02 | Objective | 02 |
| 03 | Definition | 02 |
| 04 | Lodging a Feedback | 02 |
| 05 | Required Information | 03 |
| 06 | Customer Complaints Officer | 03 |
| 07 | Feedback Handling Process | 03 |
| 08 | Complaint Recording | 04 |
| 09 | Root Cause Analysis | 04 |
| 10 | Complaint Report | 05 |
| 11 | Training & Competency | 05 |
| 12 | Exclusion | 05 |

Legal, Risk & Compliance - Management Committee Charter

1. Introduction

This document describes the Customer Feedback Handling Policy of Fairfirst Insurance Limited. (hereinafter referred to as “the Company”) which has been put in place as per the guidelines of the Insurance Regulatory Commission of Sri Lanka.

This policy has been designed to provide guidance to customers, internal and external stakeholders, and members of staff in the manner in which the Company receives and manages the Customer Feedback process. The Company is committed to being fair and impartial in handling all the Feedbacks.

2. Objective

The objective of this policy is to ensure:

- i) Awareness and understanding of handling Customer Feedback process.
- ii) Ensure proper compliance is maintained following the IRCSL guideline.
- iii) Handling of Feedbacks with a balanced view of all information or evidence.
- iv) Handling of Feedbacks from customers, internal and external stakeholders, and members of staff in a timely, effective, fair and consistent manner.

3. Definition

A “Feedback” in this Policy shall be deemed to mean any written statement of a customer or any person acting on behalf of a customer, internal and external stakeholders, alleging a grievance involving the conduct, business or affairs of the Company or any employee, representative, officer, director or advisor of the Company. A complaint could also be deemed to mean a verbal expression of dissatisfaction by a Customer, internal and external stakeholders, and members of staff of the Company relating to conduct, affairs or services provided by the Company.

4. Lodging a Feedback

Any dissatisfaction with any of the Company’s services or conduct of business is to be brought to the notice via following options;

- i) Through completion of a Customer Feedback form on our website www.fairfirst.lk
- ii) By surface mail addressed and delivered to –
The Customer Complaints Officer
Fairfirst Insurance Limited.
Access Towers II (14th Floor),
No. 278/4, Union Place,
Colombo 02.
- iii) Through e-mail : feedback@fairfirst.lk
- iv) By Telephone : 011-2428282
Fax : 011-2302980
- V) By Visiting to Head Office or any Branch Office

5. Required Information

To facilitate the investigation and redress of complaints the following information would be required to ensure the complaint is effectively and efficiently resolved:

- i) Complainant's full name and contact details.
- ii) Details of the Feedback.
- iii) Feedback related to a sales person, will require the details such as his/her Name and Sales code number, etc.
- iv) If the complaint is related to an insurance policy, will require providing the Policy number or Vehicle number.
- v) Copies of any documents to support the Feedback.

6. Customer Complaints Officer

The Customer Complaints Officer shall be primarily responsible for investigating and resolving all feedbacks, with the support of relevant Divisions and branches.

He/She shall also ensure that necessary steps are taken to resolve all complaints within the stipulated time frame. He/She shall report on weekly basis to the Head of Risk & Compliance an update on all Feedbacks received and the status of pending and resolved complaints.

7. Feedback Handling Process

i) Feedback, Registration and Acknowledgement

The Customer complaints officer shall register and acknowledge receipt of all complaints lodged within three working days, if a resolution is provided to a complainant within three working days, the resolution will be communicated along with the acknowledgement.

All customer complaints received at branches shall be reported to customer complaints officer on weekly basis (every Monday) by the respective Customer Service Executive. In the event, there are no complaints for the reporting period, a nil report need to be sent to the Customer Complaints Officer.

ii) Feedback Review

All Customer complaints officer shall review the feedback and determine if additional information or documentation would be required to complete the investigation. Should any need for clarification or additional information is required, the complainant will be contacted.

iii) Feedback Investigation

The Customer Complaints officer shall investigate the feedback objectively and impartially within fourteen (14) days with considerable and available information. Actions in relation to complainant's dealings with the Company and any other information or documents which may be available that could assist in investigating the feedback. If the feedback has been resolved within the time frame it has to be communicated to the complainant.

iv) Extension of Feedback Investigation Time Frame

If the Customer Complaints Officer is unable to resolve the feedback within the stipulated time frame of fourteen (14) days to arrive at a final decision, the Complainant should be informed of the extended period by the Customer Complaints Officer.

v) Communication of Feedback Findings

The Customer Complaints Officer shall communicate in writing on the findings to the Complainant on completion of the investigation carried out with the source of actions to be taken. This will only be required for written feedbacks.

The complaint or response to appeal shall close in the absence of reply within four (04) weeks from the date of receipt of resolution or response.

The company shall communicate the final decision containing the basis for the stand taken by the company and the ADR mechanisms available if he or she wishes to escalate the matter further.

vi) Feedback Tracking

The complainant has the right to make enquiries about the current status of the Feedback at any given time by contacting the Customer Complaints Officer of the Company.

vii) Feedback Archive

The Company should maintain records of the Feedbacks in the Customer Feedback Register for continuous monitoring purposes.

viii) Feedback appeal process

If the complainant is not satisfied with the final decision arrived out of the investigations and the CF process, the complainant shall indicate his dissatisfaction in writing stating the reasons and his expectation. The Customer Complaints officer shall attach a complete report on the efforts made to resolve the complaints to the Head of Legal, Risk & Compliance. The Head of Legal, Risk & Compliance shall review the matter and decide on how best to redress the appeal and eventually the Head of Legal, Risk & Compliance's final decision will be informed within Thirty (30) days from the date of the appeal received and close the complaint in the CFS.

If the complainant is not satisfied with the Head of Legal, Risk & Compliance's final decision, he/she may be able to use the Alternative Dispute Resolution (ADR) procedure to report to Arbitration, Insurance Ombudsman and IRCSL.

8. Complaint Recording

The Customer Complaints Officer shall maintain a Feedback Register to record and track all Feedbacks by a specific reference number.

The Complaint Register will capture the followings:

- i) The name and contact details of the complainant(s).
- ii) Subject of the complaint with the category (Marketing & Sales, proposal processing, Claims, Policy servicing, Premium, Refund, Coverage, Cover note/PPW & Other).
- iii) Classes of the insurance business.
- iv) Record of all details of the complaint including facts and cause(s) of the complaint.
- v) The outcome and any actions taken following investigation of the complaint.
- vi) Dates, times and comments in respect of complaints received, actions taken to resolve the complaint and correspondences should be mentioned in the Feedback register. The Customer Complaints Officer shall keep record of personal information of complainants solely for purposes of addressing the Feedback(s).
- vii) Whether the matter has been referred to IRCSL / Insurance Ombudsman.

9. Root Cause Analysis

Head of Legal, Risk & Compliance shall carry out periodic root cause analysis on Feedback/complaints and the findings will be reported to relevant Divisions, Legal, Risk & Compliance Committee and other relevant governing bodies, for the purpose of identifying and remedying the underlying causes of complaint.

10. Complaint Report

The Company shall render reports bi-annual basis to the IRCSL of all complaints summary with the status based on the complaint category.

Providing the root causes to identify the gaps on the Company's processes and procedures to the Management and improve the service level of respective areas, in order to follow up and monitor on the received feedbacks under the respective category.

11. Training & Competency

- a) All divisions must appoint a Customer Feedback Person-In-Charge or Alternative Person to liaise with Customer Complaints Officer in order to resolve Feedback/complaints in an expeditious manner.
- b) To the extent that is relevant to their role, employees shall be made aware of and receive appropriate training in respect of this Policy.

12. Exclusion

This Customer Feedback grievance management Policy is only a restricted document to carry out the process of grievance handling of feedbacks received to Fairfirst Insurance Limited.

Customer Feedback Process Flow Chart

