

UBL Insurers Limited

Complaint Management Policy & Procedure

Item	Detail
Version	3.0 (October 2025)
Supersedes	Version 2.0 (Board-approved November 12, 2015)
Owner	Head of Customer Experience & Grievance Function
Sponsor	Chief Executive Officer
Effective Date	Upon Board approval
Next Review	3 years (or earlier if required)

Document Control

Policy Type	Enterprise Policy (Customer & Conduct)
Version	3.0
Prepared by	Head of Customer Experience & Grievance Function
Reviewed by	CEO; COO; Head of Compliance; Head of Legal; Company Secretary; Head of Operations; Head of Claims; Head of IT; Internal Audit; BAC Chair
Approved by	Board of Directors
Effective Date	October 2025
Review Cycle	3 years
Distribution	All Employees; Branches; Contact Center; Claims; Underwriting; Operations; Compliance; Legal; Internal Audit; Company

Purpose & Policy Statement

This Policy establishes the Company's grievance redressal framework in line with applicable SECP requirements (including Circular 07/2023) and internal standards. It defines channels, SLAs, responsibilities, and reporting to ensure fair, timely, and transparent handling of complaints from policyholders and prospective customers.

Scope

- Covered Persons: Policyholders, prospective policyholders, beneficiaries, intermediaries, and any person interacting with the Company's products/services.
- Covered Subjects: Any expression of dissatisfaction (written or verbal), including unresolved inquiries/requests, regarding products, services, claims, policy administration, sales practices, or staff/agent conduct.

Definitions (selected)

- Complaint / Grievance: Written or verbal expression (including electronic means) of dissatisfaction by a customer or prospective customer about the Company, intermediaries, or distribution channels.
- Minor / Less-critical / Critical: Internal severity categories driving SLA and escalation.
- Final Reply: Company's reasoned resolution (allow/partially allow/decline) communicated in writing or recorded channel.
- Unresolved Complaint: A complaint closed as not agreed by the complainant, with reasons provided and external redress options shared.

Governance & Responsibilities

- Board of Directors: Approves the Policy; receives quarterly dashboards; oversees grievance effectiveness.
- Board Audit Committee (BAC): Monitors implementation, trends, and retaliation safeguards; reviews severe/recurring issues.
- Chief Executive Officer (Sponsor): Ensures independence, resources, and tone-from-the-top.
- Head of Grievance Function (Owner): Independent from business; operates channels; triage; investigation; closure; SECP reporting; maintains the Complaint Register.
- Claims Settlement Committee: Shall oversee the activities of the Grievance and presents quarterly complaint summaries (lodged/resolved/outstanding) to the Board.
- Compliance & Legal: Advise on regulatory responses (SECP, Ombudsman); review templates; monitor adherence.
- Operations/IT: Maintain CRM/ticketing, IVR/hotline, website notice, data integrity, and access controls.

- All Employees & Agents: Receive, record, and forward complaints; no obstruction; cooperate in investigations.

Channels

- Email: complaints@ublinsurers.com
- Web Form/Portal: Complaint e-form on website with tracking ID and evidence upload
- Hotline/IVR: Contact center with call recording and PIN-verified callbacks
- In-Person & Postal: Branch registers/boxes; surface mail to Company Secretary (Confidential – Complaints)
- Mobile / WhatsApp Business (if enabled): Auto-acknowledgement and secure handoff to CRM
- Verbal Complaints: Accepted via call center/branches; authenticity verified where from unregistered numbers

Core Procedure & SLAs

- Intake & Registration: Log complaint in CRM/Complaint Register; assign unique ID.
- Acknowledgement: Send within 2 working days (SMS/email/letter/call recording), with ID, expected timeline, and contact for follow-up.
- Triage & Assignment: Classify as Minor / Less-critical / Critical; assign owner; capture product, channel, sale year, and nature.
- Investigation & Interim Reply: Less-critical: interim after 7 working days. Critical: interim after 15 working days or sooner if risk escalates.
- Final Reply: Minor within 7 working days of lodgment; Less-critical within 15 working days; Critical within 10 working days after investigation concludes.
- Special timelines: Life (mis-selling/claim delay) and non-life (motor, PA, health, travel) investigation to be completed within 20 working days; final reply ≤ 30 days from lodgment.
- Decision & Redress: Communicate resolution (approve/partial/decline) with reasons, references, and evidence requirements.
- Unresolved Complaints: Provide reasons and external forums (Insurance Ombudsman, SECP) with contact details and Section 129(2).

Payments & Closure

- Payment Cases: Considered resolved upon payment of the amount communicated in final reply; target ≤ 15 working days from final reply.
- Closure Controls: Ensure documentation completeness, customer confirmation (where applicable), and system status updated to Resolved/Unresolved.

Registers, Reporting & MI

- Complaint Register: Maintain mandatory fields (name and CNIC, complaint number, date, product/service, year of sale, nature/type, interim and final reply dates, decision).
- Retention: Keep records for ≥ 3 years from filing or until policy maturity, whichever longer.
- SECP Reporting: Quarterly summary shall be submitted by nominated Complaint Handling officer in prescribed format (Annex-A) within 20 days of quarter end.
- Dashboards: Quarterly MI to BAC/Board covering volumes, ageing, TATs, categories, root-cause analysis, repeat issues, and corrective actions.

Awareness & Accessibility

Display (Urdu/English) notices at branches/agent premises and on the main page of Company website detailing: how to lodge complaints; documents required; modes of communication; expected response times; Ombudsman procedure when the Company does not respond within one month (per Section 129(2)).

Exceptions & Escalations

- Any SLA extension requires Owner approval with documented reasons and customer communication. Critical cases involving conduct risk or systemic issues escalated to CEO/BAC.

Effective Date & Transition

- Effective upon Board approval.
- Channels and website artifacts updated within 15 calendar days. Existing open complaints continue under this Policy and SLAs.

Appendix A — Category Definitions & Examples

- Minor: Simple query/administration error; no investigation required.
- Less-critical: Single-policy service issue requiring internal verification.
- Critical: Alleged mis-selling, fraud, privacy breach, life/health claim delay, or systemic failures.

Appendix B — SECP Quarterly Template (Annex-A) — Summary Fields

- Period; opening/received/resolved/outstanding; ageing buckets; category mix; TAT performance; unresolved reasons; corrective actions.

Appendix C — Comparative Change Log (Earlier Approved v2.0 – 2015 vs Proposed v3.0 – 2025)

Topic	Earlier Approved Policy (v2.0 – 2015)	Proposed Policy (v3.0 – 2025) — Rationale/Impact
Governance & Independence	Grievance function independent; Head reported to CEO.	Retained independence; added BAC oversight and quarterly dashboards; clarified roles of Compliance/Legal and IT. — Stronger three-lines governance.
Channels	Written, fax, email, e-forms, complaint boxes/registers; verbal via call center (with verification).	Expanded with hotline/IVR recording, web portal with uploads, optional anonymous intake, WhatsApp Business (if enabled). — Accessibility & evidence.
Acknowledgement & Final Reply SLAs	Acknowledgement within 2 working days; final replies: Minor 7d, Less-critical 15d, Critical 10d after investigation; life & key non-life: investigate ≤ 20d, final ≤ 30d.	Retained SLA set; reiterated interim updates (7d/15d) and milestone definitions; added explicit triage step. — Clarity for teams and audit.
Payments Resolution Timeline	Resolved on payment within 15 working days of final reply.	Retained; added closure controls in CRM and MI traceability.
Register, Retention & SECP Reporting	Register fields; retention ≥ 3 years or until maturity; quarterly SECP report within 20 days.	Retained with added dashboards to BAC/Board (volumes, TAT, root causes, repeat issues).
Awareness & Ombudsman	Bilingual notices; website main page; Ombudsman per Section 129(2).	Retained and emphasized placement/wording; added QR link to web form.
Escalation	Not explicitly detailed	Critical conduct/systemic issues → CEO/BAC; SLA

beyond timelines.

extensions require Owner approval with reasons. — Predictable escalation.