HDFC LIFE INSURANCE COMPANY LIMITED

Investor Grievance Redressal Policy
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Background:

The Company’s equity shares are listed on the recognized stock exchanges viz., National Stock Exchange of India Limited (NSE) and BSE Limited (BSE). Also, privately placed Non-Convertible Debentures (NCDs) in the form of subordinated debt instruments, are listed on the wholesale debt market segment of NSE.

The matters related to transfer/ transmission and transposition of securities, etc. of the Company and activities related to handling of shareholders/ investors grievance and related functions of the Company are performed by Registrar & Transfer Agent of the Company (“RTA”) viz., KFin Technologies Pvt. Ltd. (“KFintech”) which is closely monitored by the Company and confirmation in that regard is being obtained from KFintech from time to time.

Objective:

This Policy is formulated to provide prompt services to the investors and to effectively address and redress their grievances in a timely manner. It also helps build investor confidence by formulating investor grievance redressal mechanism and to develop friendly relations with the investors.

The Company should:

- Ensure visibility and accessibility of complaint handling process to all complainants
- Provide access to grievance redressal policy to investors on need to know basis
- Handle complaints professionally & in a transparent manner
- Ensure confidentiality of complainants information unless required for addressing the complaint
- Ensure clear accountability for resolution and reporting of complaints
- Continually improve its processes & systems by taking inputs/ feedback from the investors

The Company takes pride to address all the queries/ grievances/ concerns brought to its attention by the investors and also classify & differentiate queries, requests and complaints, etc. and accordingly resolve them to the satisfaction of the concerned investors.

Grievance Handling Mechanism:

The Board has appointed the Company Secretary to act as Compliance Officer of the Company under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”). As Compliance Officer, the Company Secretary is responsible for ensuring provision of prompt and effective services to shareholders and monitoring the dedicated email address of the Company for investor grievances.

The Company has engaged KFintech for handling and servicing investor queries/ requests and complaints in timely and efficient manner.

In terms of the policy adopted by the Company only grievances/ complaints received from regulatory authorities/ stock exchanges relating to the security holders shall be considered for the purpose of reporting to stock exchanges in accordance with SEBI Listing Regulations.
Some of the important steps followed by the Company for handling investor queries/ grievances are enumerated below:

- The Company has a designated email ID investor.service@hdfclife.com for handling investor grievances.
- KFintech being the Registrars and Transfer Agents (RTA) of the Company is primarily responsible for discharging investor service functions effectively, efficiently and expeditiously.
- Secretarial Department of the Company access the above-mentioned designated investor grievances e-mail ID on a regular basis to ensure timely responses to be given to the investors.
- The designated email ID of KFintech for investor services viz., einward.ris@kfintech.com was also made available to the investors for grievance redressal.
- Status Report is obtained periodically from KFintech in respect of various correspondences and complaints received by the Company directly or by KFintech and the same is being placed before the Board/ Stakeholders Relationship Committee from time to time.
- All the investor complaints/ grievances received through “SEBI Complaints Redress System” (SCORES Portal) are being attended and resolved expeditiously.
- The escalation matrix is being made available for information of the investors.

In terms of the requirements of the Companies Act, 2013 and SEBI Listing Regulations, the Company has constituted the Stakeholders’ Relationship Committee (SRC) which inter-alia oversee mechanism followed by the Company for redressal of investor grievances and effective functioning of the same. SRC reviews adherence to the service standards adopted by the Company in respect of services being rendered by RTA, measures and initiatives taken by the Company for reducing the quantum of unclaimed dividends and ensuring timely receipt of dividend warrants and any other regulatory communication by the shareholders.

**Investor Service Timelines:**

The Company and its RTA follow the following timelines for performance of its duties towards investors:

<table>
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<td>Dividend related queries</td>
<td>Within 15 days</td>
</tr>
<tr>
<td>Demat requests</td>
<td>Within 15 days</td>
</tr>
<tr>
<td>Remat requests</td>
<td>Within 30 days</td>
</tr>
<tr>
<td>Other requests - such as change of address, non-receipt of annual report and updation of bank details, etc.</td>
<td>Within 7 days</td>
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**Note:** In case, any supporting documents for addressing the investor request/ query, the said matters shall be addressed within a period of 7 days from the receipt of such documents by RTA/ Company.
In case statutory timelines for redressal of any grievance not specifically prescribed, the Company/RTA shall address such grievance within the timelines as prescribed under applicable law.

**Classification of Shareholder Communication:**

The Company receives various correspondence/communication from the shareholders/investors relating to the shares, annual reports, dividends and ancillary matters. These communications may either be complaints or mere queries/requests by the shareholders. The Company presently follows a set of guidelines for classifying the shareholders’ communication between general correspondence/requests/complaints, etc. These guidelines are internal to the Company.

**(A) Communication from investors to be treated as requests:**

(a) Non-receipt of annual report  
(b) Non-receipt of dividend  
(c) Non-receipt of share certificates  
(d) Others:  
   (i) correspondence w.r.t. change in address, nominees etc.  
   (ii) any communication/suggestions/enquiry about procedures  
   (iii) any communication requisitioning information or documents relating to the Company or its operations as per statutory rights available to the shareholders  
   (iv) communications/complaints in relation to matters that are sub-judice

**(B) Communication from investors to be treated as complaints:**

Investor communication received through statutory authorities.  

Thus, only the complaints received from regulatory bodies like SEBI, MCA, Stock Exchanges, IRDAI etc. shall be considered as complaints for reporting purpose.

**Escalation Matrix:**

HDFC Life is committed to providing effective and prompt service to its investors. The Company has in place designated e-mail ID for investor servicing and grievance redressal.

However, the primary responsibility of investors servicing and handling of investor requests/queries/complaints lies with KFinTech in a capacity of RTA of the Company. Investors can refer the below given escalation matrix in case they do not receive any revert from RTA/Company within the timelines specified above.
Level 1
KFin Technologies Private Limited
Unit: HDFC Life Insurance Company Limited
Contact Person: Krishna Priya M., Senior Manager
Address: Selenium Tower B, Plot 31-32, Gachibowli, Financial District, Nanakramguda, Hyderabad – 500 032
Email: einward.ris@kfintech.com
Tel No.: +91 40 6716 2222
Toll Free No.: 1800-309-4001

Level 2
Executives of Secretarial Department of the Company
Ms. Karishma Tanna / Mr. Jimit Prajapati

Address: HDFC Life Insurance Company Limited,
13th Floor, Lodha Excelus, Apollo Mills Compound,
N M Joshi Marg, Mahalaxmi,
Mumbai – 400 011
Tel. No. : 6751 6642 / 6751 6647
Email: investor.service@hdfclife.com

Level 3
Mr Narendra Gangan
General Counsel, Chief Compliance Officer & Company Secretary

Address: Same as above

Level 4
SEBI SCORES

In case any of the investors is not satisfied with the response furnished by the Company to his/ her complaint, he/ she may refer it to “SCORES”, the centralized online system for lodging and tracking complaints made available by SEBI.

SCORES facility can be accessed through the web link https://scores.gov.in

Address and contact details for correspondence with Debenture Trustee:
IDBI Trusteeship Services Limited Asian Building, 17, R. Kamani Marg, Ballard Estate,
Mumbai-400 001
Tel. No.: +91 22-4080 7000
Email id: itsl@idbitrustee.com

Contact details of the Nodal Officer for IEPF related queries:
Mr. Narendra Gangan, General Counsel, Chief Compliance Officer & Company Secretary
Tel No.: 022 – 6751 6666
Email id: investor.service@hdfclife.com