

## Complaint Handling and Grievance Redressal Policy

BY INTERLINK INSURANCE AND REINSURANCE BROKING PRIVATE LIMITED  
Regulated Entities in the IFSC (Gift city Branch)

### Version Control

Version No.	Month	Approved by
1.0	March 2025	Board

### Table of Contents

1. Background
2. Definitions
3. Objective
4. Scope
5. Requirements for Dealing with Retail Consumers
6. Complaint before the Authority
7. Maintenance of Records
8. Reporting
9. Amendments to the Policy

### 1. Background

This Complaint Handling and Grievance Redressal Policy ("Policy") is framed in accordance with Circular No. F. No. IFSCA-LPRA/3/2024-Legal and Regulatory Affairs dated December 02, 2024 and January 13, 2025, issued by the International Financial Services Centres Authority (IFSCA) (hereinafter referred to as the "Circular").

As per the Circular, every Regulated Entity ("RE") operating in the IFSC is required to establish a policy on handling complaints and grievance redressal, duly approved by its Board of Directors (or equivalent governing body).

### 2. Definitions

- **Complaint:** Any expression of dissatisfaction, whether oral or written, made by a client or potential client concerning the Company's standard of services, actions, products, or staff, where a resolution or corrective action is expected.
- **Complaint Redressal Officer (CRO):** An employee of the Regulated Entity responsible for receiving, assessing, and resolving complaints from consumers.
- **Complaint Redressal Appellate Officer (CRAO):** A senior-level official of the Regulated Entity designated to handle appeals filed by consumers against the decision taken by the CRO.



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### 3. Objective

The objective of this Policy is to establish **fair, transparent, and efficient mechanisms** for receiving, handling, and resolving complaints from retail consumers in a timely and impartial manner, thereby strengthening trust and accountability.

### 4. Scope

This Policy applies to all complaints received by the Regulated Entity from retail consumers in respect of its business operations in the IFSC.

The complaint handling process shall:

- Ensure acknowledgement of complaints within defined timelines.
- Provide fair, equitable, and unbiased resolution.
- Keep complainants informed of progress throughout the process.
- Dispose of complaints within the prescribed time limits.

### 5. Requirements for Dealing with Retail Consumers

#### a. On receipt of a complaint:

- The CRO shall assess the complaint on its merits.
- If accepted, the complaint shall be acknowledged in writing within 3 working days of receipt.
- If not accepted, the complainant shall be informed within 5 working days with reasons.

b. **Processing:** Complaints shall be examined and processed in a fair, transparent, professional, and impartial manner.

c. **Timelines:** Complaints should preferably be resolved within 15 days, but no later than 30 days from acceptance. The CRO may either resolve or reject the complaint.

d. **Appeal:** If dissatisfied, the complainant may file an appeal before the CRAO within 21 days of the CRO's decision.

e. **Disposal of Appeal:** The CRAO shall dispose of the appeal within 30 days.

### 6. Complaint before the Authority

If the complainant is not satisfied after exhausting the appellate mechanism, they may file a complaint before the IFSCA Authority at [grievance-redressal@ifsca.gov.in](mailto:grievance-redressal@ifsca.gov.in), preferably within 21 days of receipt of the CRAO's decision.

### 7. Maintenance of Records

The Regulated Entity shall maintain complete records of:

- Complaints received and processed.
- Correspondence with complainants.
- Documents and information relied upon.
- Outcomes and resolution details.
- Reasons for rejection, if any.
- Timelines observed for each complaint.
- Consolidated data of all complaints handled.



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## 8. Reporting

- a. Reports on complaints shall be filed in the form and manner specified by the IFSCA from time to time.
- b. A dedicated section titled "Complaint Handling and Grievance Redressal" shall be included in the Annual Report (if applicable), providing data on complaints received, resolved, rejected, and pending, presented in a tabular or graphical format.
- c. Where the RE is not required to file an Annual Report, the information shall be published on its website (or a dedicated webpage of its Group Entity) on an annual basis.

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## 9. Amendments to the Policy

This Policy has been reviewed and approved by the Board of Directors in accordance with the requirements prescribed under the IFSCA Circulars dated December 02, 2024, and January 13, 2025.

The Board reaffirms its commitment to ensuring that consumer complaints are handled fairly, transparently, and efficiently, in alignment with regulatory expectations.

The Policy shall be subject to periodic review by the Board, and amendments shall be made as necessary to reflect:

- Changes in regulatory guidelines,
- Evolving business operations, or
- Emerging industry best practices.

The Company shall ensure that this Policy is effectively implemented across all relevant functions and is accessible to all stakeholders.



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## Escalation Matrix for Complaint Handling

In accordance with the **Complaint Handling and Grievance Redressal Policy**, the following officers have been designated for handling and escalating complaints within the Regulated Entity:

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### 1. Complaint Redressal Officer (CRO)

- **Name:** Mr. Parag Kumbhani
- **Responsibilities:**
  - First point of contact for all complaints.
  - Assess and acknowledge complaints within 3 working days.
  - Resolve or reject complaints within prescribed timelines.
- **Contact Details:**
  - Phone: +91-91671 22658
  - Email: parag.kumbhani@interlinkre.com

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### 2. Complaint Redressal Appellate Officer (CRAO)

- **Name:** Mrs. Mital Chavan
- **Responsibilities:**
  - Handle appeals filed by complainants dissatisfied with CRO's decision.
  - Dispose of appeals within 30 days.
  - Ensure impartial review of CRO's handling.
- **Contact Details:**
  - Phone: +91-22-6734 0000
  - Email: mital.varia@interlinkre.com

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### 3. Principal Officer

- **Designation:** Mr. Keyur Parekh
- **Responsibilities:**
  - Oversee the grievance redressal framework at the entity level.
  - Ensure policy compliance and report unresolved issues to the Board / Audit Committee.
- **Contact Details:**
  - Phone: +91-9820067063
  - Email: keyur.parekh@interlinkre.com

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### 4. External Escalation to the Authority (IFSCA)

If the complainant remains dissatisfied after exhausting the above mechanisms, they may approach the Authority:

- **Authority:** International Financial Services Centres Authority (IFSCA)
- **Email:** grievance-redressal@ifsc.gov.in
- **Timeline:** Preferably within 21 days from receipt of the CRAO's decision.



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