



Complaint Handling and Grivance Redressal Policy

Version 2.0

InBrok (IFSC) Private Limited

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Register of Amendments

Date	Author	Change Description	Approved By	Version
November 20, 2024	Artem Vologdin	Document created	Board of Directors on meeting dated November 20, 2024	1.0
January 09, 2025	Artem Vologdin	IFSCA Circular dated December 02, 2024, implemented	Board of Directors through circular resolution dated January 15, 2025	2.0

All documents within **InBrok (IFSC) Private Limited** are classified in the following way. **PUBLIC** documents are intended for anyone, and **CONFIDENTIAL** documents are to be kept confidential within the Company and used for normal business activities by the general office population, **HIGHLY CONFIDENTIAL** documents are to be kept confidential to restricted individuals within the Company.



Part I: Background

Inbrok (IFSC) Private Limited (The “Firm” / “Broker Dealer” / “Company”) is registered with International Financial Services Centres Authority (“**IFSCA**”) as a Broker Dealer under the International Financial Services Centres Authority Capital Market Intermediaries Regulations, 2021 (“**IFSCA CMI Regulations**”).

Part II: Objective & Preamble

The objective of the Grievance Redressal Policy (the “Policy”) is to provide efficient services to the client and to effectively address and redress the grievances of the client in a timely manner. It also helps build confidence by formulating client grievance redressal mechanisms and to develop friendly relations with the clients.

The purpose of this policy is to establish a comprehensive and transparent framework for handling complaints and grievances from for InBrok (IFSC) Private Limited. The objective is to ensure proper grievance redressal mechanism for receiving, handling, and redressing complaints in fair, transparent and timely manner.

The Firm as a Broker Dealer shall address all the complaints brought to its attention by the clients and classify & differentiate queries, requests, and complaints, etc. and accordingly resolve them to the satisfaction of the concerned clients. A complaint is “written expression of dissatisfaction from a Client to an Authorized Person in connection with the provision of, or failure to provide, a Regulated Activity to the Client”.

The Compliance Officer is responsible for ensuring the provision of prompt and effective services to the clients and monitoring the dedicated email address of the Broker Dealer for grievances.

Part III: Applicability

This policy applies to all complaints received from:
All retail / professional / non-retail clients of InBrok (IFSC) Private Limited.

Exclusions:

Complaints from the following entities or categories are not covered under this policy:

1. Complaints from group entities of InBrok.
 2. Complaints classified under exclusions listed in Schedule-I of the IFSCA circular.
- This policy will take effect from **January 15, 2025**, as per the guidelines set forth by IFSCA¹.

¹ IFSCA Circular no. F. No. IFSCA-LPRA/3/2024-Legal and Regulatory Affairs, regarding Complaint Handling and Grievance Redressal by Regulated Entities in the IFSC dated December 02, 2024

Part IV: General Principle

1. Clients are always treated fairly.
2. Grievances / complaints raised by Clients are dealt with courtesy and in a timely manner.
3. Queries and grievances / complaints are treated efficiently and fairly.
4. The Broker Dealer works in good faith and towards the interests of the clients.

Part IV: Roles and Responsibilities of Compliance officer

- Oversee the entire complaint handling and grievance redressal process.
- Ensure compliance with the regulatory requirements stipulated by IFSCA.
- Report on complaint handling performance to the Board and the IFSCA, as applicable

Part V: Complaint Handling Framework

The detailed complaint handling framework is listed as follows:

5.1 Submission of complaints

Clients can submit the complaints through the following channels.

- *Email:*
Info@inbrok.in
- *Phone:*
+971 585 131264
- *In writing:*

The registered office address of the company as follows:

InBrok (IFSC) Private Limited

GA-06. Ground Floor, Pragya Accelerator,
Block No. 15, Zone 1, Road No. 11,
GIFT SEZ, GIFT City, Gandhinagar – 382355
Gujarat, India

5.2 Acknowledgement of Complaints

1. Upon receipt of the complaint, the compliance officer will acknowledge it within 3 working days.

2. If the complaint is incomplete, or requires additional information, the compliance officer will request clarification within the acknowledgment period.

5.3 Processing & Investigation of Complaints

- Complaints will be examined fairly, transparently and professionally. The Company must ensure that any individual handling the complaint is not or was not involved in the conduct of the financial service about which the complaint has been made and is able to handle the complaint in a fair and impartial manner. Normally, the Compliance officer will be responsible for investigating any complaints and will be authorised to assign tasks involved in the investigation process to any person or employee as deemed appropriate in that situation.
- Complaints posing high risk to the Firm and depending upon severity of the matter involved, Director should bring the matter to the attention of the Board.
- The Compliance officer will have the authority to resolve complaints or consult with other officials as needed
- The Compliance Officer gathers all information available on the grievance / complaint which is considered necessary for a proper investigation.
- Complaints will be resolved within 15-30 days of acceptance

5.4 Resolution of Complaints

Clients will be informed of the resolution in writing.

If a complaint is rejected, the client will receive reasons for the rejection along with details of appeal mechanism.

Part VI: Appeal Mechanism

6.1 Appeal Mechanism

- If the client remains dissatisfied after the resolution provided, they may escalate the complaint before the NSE IX through below e-mail.

investorgrievance@nseix.com

- If the client remains dissatisfied with the decision / resolution provided by NSE IX, they may escalate the complaint before IFSCA through below e-mail preferably within 21 days of receipt of the decision from the NSE IX.

grievance-redressal@ifsc.gov.in

Part VII: Maintenance of Records

In a view to maintaining records of the complaint received from the clients of InBrok (IFSC) Private Limited, register of complaints and resolution is maintained by the company for a period of six years which includes following.

1. Details of complaints received, including the nature of the complaint.
2. Correspondence with complaint,
3. Actions taken to resolve the complaint
4. Outcomes and timelines for resolution

The records will be stored in a secure electronic format with robust retrieval mechanisms.

Part VIII: Reporting and Transparency

A dedicated section on official website of InBrok (IFSC) Private Limited, titled as “Complaint Handling and Grievance Redressal” has mandated on website.

The section includes following.

- Contact details of compliance officer
- Information on how to file a complaint and appeals
- Data on complaints handled annually

Part IX: Compliance and Oversight

The compliance officer will ensure all complaints are handled in accordance with the IFSCA regulations and company policies. Periodic audits will be conducted to ensure adherence to this policy.

Part X: Exclusions

The following are excluded from the scope of this policy:

1. Anonymous complaints, except the whistleblower complaints
2. Complaints lacking sufficient details or evidence
3. Matters unrelated to InBrok’s financial products and services



Part XI: Policy Review and Updates

This policy will be reviewed periodically and updated to reflect the changes in regulatory requirements or business operations.

Conclusion

InBrok IFSC Private Limited is committed to fostering trust and confidence among its clients by ensuring a robust, transparent, and consumer-centric grievance redressal mechanism.