



Complaint Handling and Grievance Redressal Policy

Version 6.0

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
November 18, 2025	Artem Vologdin	Regulatory changes introduced by IFSCA	Board of Directors via circular resolution dated November 18, 2025	3.0
February 02, 2026	Gaurang Raval	Administrative update to include reference to Annexure 1 and disclosure of Complaint Redressal Officer (CRO) and Complaint Redressal Appellate Officer (CRAO) details; no change to policy framework or grievance handling process.	Management approved dated February 3, 2026	4.0
May 4, 2026	Nikita Suyani	Regulatory changes introduced by IFSCA for Global Access in IFSC	Board of Directors via circular resolution dated May 4, 2026	5.0

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, 2025 (“**IFSCA CMI Regulations**”) & Regulatory framework for global access in the IFSC.

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 V: Complaint Handling Framework

The detailed complaint handling framework is listed as follows:

The Company has adopted a detailed Complaint Handling and Grievance Redressal Framework, defining the roles of the Complaint Redressal Officer (CRO) and the Complaint Redressal Appellate Officer (CRAO), and covering submission, acknowledgement, investigation, resolution, appeal and record maintenance of complaints.

The said framework is set out in Annexure 1 to this Policy and shall be followed for handling all complaints received by the Company.

Part VI: Appeal Mechanism

Appeal Mechanism

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

The Company shall maintain a dedicated section on its website titled “Complaint Handling and Grievance Redressal”.

Details of the CRO and CRAO, including contact information, shall be disclosed on the website and in Annexure 1 to this Policy.

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 IV: Global Access – Investor Protection, Dispute Resolution and Grievance Redressal

InBrok provides Global Access services to eligible clients through arrangements with foreign brokers and/or other intermediaries, pursuant to which transactions may be executed in overseas markets. Such transactions are not transactions executed on a Recognised Exchange in the IFSC and are subject to the applicable laws, regulations, market rules and investor protection framework of the relevant foreign jurisdiction and market.

Accordingly, clients availing Global Access services shall be informed of the following limitations:

1. Investor Rights and Investor Protection

The rights of investors and investor protection mechanisms provided by Recognised Exchanges in the IFSC do not apply to, and are not available in respect of, transactions undertaken through InBrok’s Global Access arrangements.

Any investor protection or compensation mechanism that may be available in relation to a Global Access transaction will be subject to the applicable framework of the relevant foreign jurisdiction, market and/or foreign intermediary.

2. Dispute Resolution Mechanism



As Global Access transactions are executed in overseas markets and not on a Recognised Exchange in the IFSC, the dispute resolution mechanisms provided by Recognised Exchanges in the IFSC do not apply to, and are not available in respect of, such transactions.

Any market specific dispute resolution mechanism applicable to the underlying transaction will be subject to the laws, regulations and procedures of the relevant foreign jurisdiction, market and/or foreign intermediary.

This limitation does not affect a client's ability to raise a complaint concerning InBrok or the Global Access services provided by InBrok, which shall be handled in accordance with the complaint handling and escalation procedures set out in this Policy.

3. Investor Grievance Redressal Mechanism

As Global Access transactions are executed in overseas markets and not on a Recognised Exchange in the IFSC, the investor grievance redressal mechanisms provided by Recognised Exchanges in the IFSC do not apply to, and are not available in respect of, such transactions.

Any grievance redressal mechanism available in relation to the underlying transaction will be subject to the applicable framework of the relevant foreign jurisdiction, market and/or foreign intermediary.

Notwithstanding the above, Global Access clients retain the right to submit complaints concerning InBrok or the Global Access services provided by InBrok directly to the Company. Such complaints shall be handled in accordance with the Complaint Handling and Grievance Redressal Framework set out in this Policy, including the applicable review and internal escalation process through the Complaint Redressal Officer ("CRO") and Complaint Redressal Appellate Officer ("CRAO").

Where a complaint relates to the services or activities of a foreign broker or other intermediary involved in the Global Access arrangement, InBrok shall, where applicable, facilitate the appropriate communication and escalation of the matter to the relevant entity.

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.



Annexure 1 Complaint Handling & Grievance Redressal Framework

1. Submission of complaints

Clients can submit the complaints through the following channels.

a) Email:

Info@inbrok.in

b) Phone:

+91 97120 02883

c) In writing:

The registered office address of the company

2. Acknowledgement of Complaints

All complaints received shall be acknowledged by the Complaint Redressal Officer (CRO) within three (3) working days of receipt.

- a) Where a complaint is incomplete or requires additional information, the CRO shall seek clarification within the acknowledgement period.

3. Processing & Investigation of Complaints

- a) Complaints shall be examined fairly, transparently and professionally under the oversight of the CRO.
- b) The CRO shall investigate complaints and may assign tasks to relevant personnel, as deemed appropriate.
- c) Any individual involved in the conduct of the activity complained of shall not be involved in handling the complaint.
- d) Complaints involving significant risk or severity may be escalated to senior management or the Board, as appropriate.
- e) Complaints shall ordinarily be resolved within 15–30 days of acceptance.

4. Resolution of Complaints

The CRO shall communicate the resolution to the complainant in writing.

Where a complaint is rejected, reasons for rejection along with details of the appeal mechanism shall be provided.

5. Internal Appellate Mechanism

If the complainant is dissatisfied with the resolution provided by the CRO, or where no response is received within the stipulated timeline, the complainant may escalate the grievance to the Complaint Redressal Appellate Officer (CRAO).

The CRAO shall conduct an independent review of the complaint, including the handling and resolution provided by the CRO, and communicate the final internal decision to the complainant.

6. Details of CRO & CRAO

Particulars	Complaint Redressal Officer (CRO)	Complaint Redressal Appellate Officer (CRAO)
Name	Artem Vologdin	Ksenia Begicheva
Designation	Director	Director
Phone	+971 58 513 1264	+971 58 506 0124
Email	artem.vologdin@inbrok.in	kb@inbrok.in



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.