

INDIA EXIM FINSERVE IFSC PRIVATE LIMITED
(EXIM FINSERVE)



POLICY FOR COMPLAINT HANDLING AND GRIEVANCE
REDRESSAL

(EFFECTIVE FROM APRIL 01,2025)

POLICY FOR COMPLAINT HANDLING AND GRIEVANCE REDRESSAL

1. Introduction:

India Exim Finserve IFSC Private Limited, a company incorporated in terms of the Companies Act, 2013, with Corporate Identification Number: U66190GJ2023PTC142216 (hereinafter referred to as Exim Finserve). Exim Finserve is a private limited company, and a subsidiary of Export-Import Bank of India (Exim Bank), incorporated in Gujarat International Financial Tec-City (GIFT City) which is an International Financial Services Centre established under the International Financial Services Centres Authority Act, 2019 (IFSCA Act). Exim Finserve provides financial assistance to Indian exporters and extends credit to export-oriented Indian companies, including by way of export credit, trade finance and factoring facilities. The business of Exim Finserve is regulated by International Financial Services Centres Authority (hereinafter referred to as IFSCA or the Authority).

The business offering of Exim Finserve is governed by the applicable acts, rules, guidelines etc. published by various regulatory bodies including IFSCA and any other applicable guidelines / act in India. IFSCA has recently published its guidelines vide circular F. No. IFSCA-LPRA/3/2024-Legal and Regulatory Affairs dated December 2, 2024 regarding 'Complaint Handling and Grievance Redressal by Regulated Entities in the IFSC. The circular highlights the importance of all regulated entities in IFSC to protect the interest of its financial consumers. The circular therefore highlights the requirement of regulated entities to accordingly have an efficient and effective mechanism for handling of complaints and redress of grievances of its consumers. The circular encompasses the requirement for IFSCA's registered regulated entities to lay down a policy for complaint handling and grievance redressal.

As part of its business offering to various export oriented Indian businesses, Exim Finserve is committed to ensure a transparent, efficient, and timely process for handling Complaints and Grievances of its customers and lays down its internal policy for Complaint Handling and Grievance Redressal.

2. Objective:

Policy for Complaint Handling and Grievance Redressal ("Policy") is framed in accordance with the International Financial Services Centres Authority Circular No. IFSCA-LPRA/3/2024-Legal and Regulatory Affairs dated December 02, 2024. It outlines the framework and mechanisms for addressing complaints and grievances raised by clients, stakeholders, and other relevant parties.

3. Scope and Applicability:

This policy applies to all Complaint and grievances received by Exim Finserve from clients, stakeholders, and other parties interacting with our services.

4. Definitions:

- (i) **Complaint:** An expression of dissatisfaction made to the Exim Finserve of any nature related to its services or the way they have been delivered except
 - (a) Anonymous Complaint;
 - (b) Incomplete or un-specific Complaint;
 - (c) Allegations without supporting documents;
 - (d) Suggestions or seeking guidance/explanations;
 - (e) Complaints on matters not relating to the financial products or services provided by the Exim Finserve;
 - (f) Complaints about unregistered/un-regulated activity;
 - (g) References in seeking information or clarifications about financial products or services.
- (ii) **Complainant:** A client or any other person who has raised any Complaint against the services or the way they have been delivered.
- (iii) **Complaint Redressal Appellate Officer or CRAO:** shall be an employee of Exim Finserve of senior level person designated for handling appeals of consumers against the decision taken by the Complaint Redressal Officer.
- (iv) **Complaint Redressal Officer or CRO:** shall be an employee of Exim Finserve responsible for handling of Complaint received from complainant.
- (v) **Circular:** Circular No. IFSCA-LPRA/3/2024-Legal and Regulatory Affairs dated December 02, 2024.
- (vi) **Grievance:** A formal escalation of a Complaint that has not been resolved to the satisfaction of the complainant.

5. Complaint Redressal Officer (CRO):

Exim Finserve shall have a Complaint Redressal Officer responsible for overseeing the implementation of this Policy. The CRO shall act as the primary point of contact for Complaint and grievance and ensure adherence to IFSCA guidelines.

6. Complaint Redressal Appellate Officer (CRAO):

Exim Finserve shall constitute a Complaint Redressal Appellate Officer responsible for overseeing the appeals of complainant against the decision of CRO. The CRAO shall act as the secondary point of contact for Complaint and grievance and ensure adherence to IFSCA guidelines.

7. Complaint Handling Process:

(i) Lodging a Complaint:

Complaint can be submitted through the following channels:

- Email: grievance-redressal@eximfinserve.in
- Physical Submission: Complaint Redressal Officer(CRO),
F12, GIFT House, 1st Floor, BK 12, RD 1-D, Zone 1, GIFT
City, Gandhinagar, Gujarat, India, 382355.

Complaint must include details such as the complainant's name, contact information, and a description of the issue.

(ii) Acknowledgment:

All Complaint shall be acknowledged in writing within 10 working days of receipt and proper communication of the acknowledgement should be sent to the Complainant.

(iii) Resolution Timeline:

Complaint shall be resolved within 30 working days from the date of receipt of the Complaint. If additional time is required, the Complainant shall be informed of the delay and the expected resolution timeline.

8. Grievance Redressal Process

If a Complainant is dissatisfied with the resolution provided by the CRO, they may within 21 days of response issued from CRO escalate the matter to the CRAO by lodging a Complaint in same manner as specified for filing Complaint before CRO through email at md@eximfinserve.in along with a copy of the decision of CRO. CRAO will resolve the matter within further 30 working days from the date of receipt.

9. Appeal to IFSCA:

If the Complainant is still dissatisfied, they may approach the IFSCA preferably within 21 days for further redressal through email at grievance-redressal@ifsc.gov.in as per the procedures outlined in the Circular.

10. Reporting:

Quarterly Reports on Complaint handling and grievance redressal shall be submitted to the Board. Exim Finserve shall give a disclosure with heading "Complaint Handling and Grievance Redressal" in its Annual Report in the manner given under circular. Exim Finserve shall file reports on handling of Complaint in the form and manner specified by the Authority from time to time.

11. Record Maintenance:

- Exim Finserve shall maintain all records relating to handling of Complaints including the following in electronic retrieval form for Eight(8) years:-
 - (i) Complaint received and processed;
 - (ii) All correspondence exchanged between Exim Finserve and Complainant;
 - (iii) All information and documents examined and relied upon by the Regulated Entity while processing the Complaint;
 - (iv) Outcome of the Complaint;
 - (v) Reasons for rejection of Complaint, if any;
 - (vi) Timelines for processing of Complaint; and
 - (vii) Data of all Complaint handled by it.
- Any pending litigation or legal proceeding relating to the Complaint, the record shall be maintained for the applicable period, after final disposal of the proceeding.

12. Confidentiality:

Exim Finserve shall ensure the confidentiality of complainants' information at all stages of the Complaint handling and grievance redressal process.

13. Policy Review:

This Policy shall be reviewed annually or as required by changes in regulatory guidelines to ensure its continued relevance and effectiveness.

14. Dissemination of the Policy:

This Policy shall be made publicly available on the Company's website and shall also be disclosed on the notice board on office of Exim Finserve.

15. Breach and Penalties:

The breach of this policy by the employees of the Exim Finserve may lead to disciplinary action being taken by the Board / sub-committee appointed by the Board.