

**Howden India**

**Complaints & Grievance Redressal Policy**

## Introduction and Purpose

Howden Insurance Brokers India Private Limited (“Company” or “Howden India”) is a licensed Composite Insurance Broker under the Insurance Regulatory and Development Authority of India (IRDAI) and operates in both the Domestic Tariff Area (DTA) under IRDAI regulations and the International Financial Services Centre (IFSC) under the International Financial Services Centres Authority (IFSCA) framework, where applicable.

This Policy is framed in compliance with:

- **For DTA:** IRDAI (Insurance Brokers) Regulations, 2018 (as amended), and IRDAI guidelines on policyholder protection and grievance redressal.
- **For IFSCA:** IFSCA Circular No. IFSCA-LPRA/3/2024 dated December 02, 2024, on Complaint Handling and Grievance Redressal by Regulated Entities in the IFSC, and IFSCA (Management Control, Administrative Control and Market Conduct of Insurance Business) Regulations, 2023 (as amended).

The purpose of this Policy is to establish a robust framework for protecting policyholders’ interests and ensuring timely, fair, and transparent redressal of customer complaints and grievances across DTA and IFSC operations. It aims to minimize service failures, enhance customer satisfaction, and comply with regulatory requirements.

## Definitions

- (i) “Authority” means IRDAI for DTA operations and IFSCA for IFSC operations.
- (ii) “Complainant” or “Customer” means a policyholder, prospect, nominee, assignee, or beneficiary who files a complaint against an insurer or Howden India.
- (iii) “Complaint Redressal Officer” (CRO) means the designated officer responsible for handling initial complaints.
- (iv) “Complaint Redressal Appellate Officer” (CRAO) means the senior officer handling appeals against CRO decisions.

## What is a Complaint or Grievance?

A “Complaint” or “Grievance” is any written expression of dissatisfaction (including emails or electronic submissions) regarding our services, such as issues with insurance policy solicitation, sales, or servicing. Please note that general inquiries, requests for information, or suggestions are not considered complaints. For examples of non-complaints refer to **Annexure 1** at the end of this policy.

## Who Can File a Complaint?

You can file a complaint if you are a Customer of an insurance policy serviced by Howden India.

## How to File a Complaint

We offer multiple channels for you to register your complaint, ensuring accessibility and convenience. Below are the details for both DTA and IFSC operations:

### For DTA Operations (Under IRDAI)

Channel	Mode	Details
Contact Centre	Email	<a href="mailto:grievances@howdenindia.com">grievances@howdenindia.com</a>
Website	Online Form	Raise a request at <a href="http://www.howdengroup.com/in-en/form/complaints-and-grievances">www.howdengroup.com/in-en/form/complaints-and-grievances</a>
Complaint Redressal Officer (CRO)	Email	Name: Sachin Kumar Email: <a href="mailto:grievances@howdenindia.com">grievances@howdenindia.com</a>
Complaint Redressal Appellate Officer (CRAO)	Email	Name: Abhijit Sethi Email: <a href="mailto:grievances@howdenindia.com">grievances@howdenindia.com</a>

### For IFSC Operations (Under IFSCA)

Channel	Mode	Details
Contact Centre	Email	<a href="mailto:howdenindia-grievances.ifsca@howdengroup.com">howdenindia-grievances.ifsca@howdengroup.com</a>
Website	Online Form	Raise a request at <a href="http://www.howdengroup.com/in-en/form/complaints-and-grievances">www.howdengroup.com/in-en/form/complaints-and-grievances</a>
Complaint Redressal Officer (CRO)	Email	Name: Ankur Sahai Email: <a href="mailto:howdenindia-grievances.ifsca@howdengroup.com">howdenindia-grievances.ifsca@howdengroup.com</a>
Complaint Redressal Appellate Officer (CRAO)	Email	Name: Abhijit Sethi Email: <a href="mailto:howdenindia-grievances.ifsca@howdengroup.com">howdenindia-grievances.ifsca@howdengroup.com</a>

## Our Complaint Resolution Process

### Step 1: Acknowledgement

Once you submit a complaint, we will acknowledge it within **3 days** via email or letter. If your complaint does not meet the criteria (e.g., it is incomplete or anonymous), we will inform you within **5 days** with reasons for non-acceptance.

### Step 2: Resolution

Our Complaint Redressal Officer (CRO) will investigate your complaint, which may involve gathering additional information including intimation to the relevant insurer. We aim to resolve your complaint within the following timelines:

- **DTA Operations:** Within **14 days** from receipt.
- **IFSC Operations:** Within **15 days** (up to a maximum of **30 days** if additional time is needed).

You will be informed of the resolution, along with reasons and details of the appeal process if applicable.

### Step 3: Appeal

If you are not satisfied with the CRO's resolution, you can appeal to our Complaint Redressal Appellate Officer (CRAO) within **21 days**. The CRAO will review and dispose of the appeal within **30 days**.

### Further Escalation

If you remain unsatisfied after the CRAO's decision, you may escalate your complaint to the respective regulatory authority:

- **For DTA Operations:** Contact the Insurance Ombudsman (details available on the IRDAI website) or file a complaint with IRDAI via the Integrated Grievance Management System (IGMS).
- **For IFSC Operations:** File a complaint with IFSCA at **[grievance-redressal@ifsc.gov.in](mailto:grievance-redressal@ifsc.gov.in)**.

### Service-Related Matters

For service-related matters, we aim to intimate the insurers within **14 days** for DTA operations and **15–30 days** for IFSC operations. We will coordinate with them and keep you informed. We are not in breach of any timelines if delays are due to the insurer's response.

### Our Commitment to You

- **Fair Treatment:** We follow IRDAI and IFSCA guidelines to ensure transparency and fairness.
- **Training and Awareness:** Our team undergoes regular training to minimize service issues and enhance your experience.
- **Compliance:** We adhere to all regulatory requirements and maintain records of complaints.
- **Reporting:** We submit reports to IRDAI and IFSCA, as required under applicable regulations, to ensure accountability.
- **Policy Review:** This policy is reviewed annually or upon regulatory changes to serve you better.

### **Annexure 1: Matters Not Considered as Complaints**

The following are not classified as complaints:

1. Anonymous complaints.
2. Incomplete or unspecified complaints.
3. Allegations without supporting documents.
4. Suggestions or requests for guidance.
5. Matters unrelated to financial products or services.
6. Unregistered or unregulated activities.
7. Requests for information or clarification.

### **Contact Us**

If you have any questions about this policy or need assistance, please reach out to us via the channels listed above. We value your feedback