

ADITYA BIRLA CAPITAL DIGITAL LIMITED
Customer Grievance Redressal Policy (Insurance Products)

This Policy applies exclusively to the life, health, general and motor insurance products distributed by Aditya Birla Capital Digital Limited. It has been extracted, as a stand-alone document, from ABCDL's consolidated Customer Protection and Grievance Redressal Policy so that it may be independently published and administered.

Review History

Version	Owner	Change History	Approved by Board of Directors	Remarks
1.0	Compliance Team	Created	22-01-2024	Initial Version
1.1	Compliance Team	Change in Nodal Officer from Himanshu Kaul to Akash Anchan	25-04-2024	Modified Version
1.2	Compliance Team	Modified document as per the Payment Aggregator & Payment Gateway perspective	22-10-2024	Modified Version
1.3	Compliance Team	Removal of PA Guidelines	22-04-2025	Modified Version
1.4	Compliance Team	Change of Nodal officer	18-07-2025	Modified Version
1.5	Customer service	Policy restructured to create separate stand-alone Grievance Redressal Policies for PPI and Insurance products, each with product-specific complaint handling, escalation and reporting provisions.	23-07-2026	Modified Version – Policy demerged into product-specific documents

Annual Review

Version	Details of Maker	Details of Checker	Date of review	Mode of confirmation

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1. INTRODUCTION

- 1.1. Aditya Birla Capital Digital Limited (the “**Company**” or “**ABCDL**”) is a company incorporated in the year 2023 under the Companies Act, 2013 with its registered office in Mumbai.
- 1.2. ABCDL distributes Insurance Products in its capacity as a registered distribution channel and not as an insurer. This Policy is framed having regard to the Applicable Laws, as amended from time to time.
- 1.3. ABCDL has framed this Customer Grievance Redressal Policy (the “**Policy**”) with the approval of its Board of Directors and designated a Grievance Redressal Officer to ensure adherence to the Policy.
- 1.4. Nothing in this Policy derogates from the obligations of the insurer whose Insurance Product is the subject matter of a Complaint. Where a Complaint pertains to underwriting, policy servicing, or the admission or settlement of a claim, ABCDL will forward the Complaint to the concerned insurer, inform the Customer that it has done so, and enable the Customer to track the Complaint until closure.

2. DEFINITIONS

- a. “**Applicable Laws**” means any statute, law, regulation, ordinance, rule, judgment, notification, order, decree, by-law, permit, licences, approvals, consents, authorisations, government approvals, directives, guidelines, requirements, or other governmental restrictions, or any similar form of a decision of, or determination by, or any interpretation, policy or administration, having the force of the law of any of the foregoing, by any Authority, whether in effect as on the date of you agreeing to be bound by this policy or at any time thereafter.
- b. “**Customer**” means an individual or an entity who is the end user of the Insurance Products distributed by ABCDL;
- c. “**Complaint or Grievance**” refers to any correspondence that is comprehensive and unambiguous in its manner and that expresses dissatisfaction with unsatisfactory service, inappropriate behaviour, or any act of omission or commission. Communications meant to provide suggestions, feedbacks, queries or clarifications, however, won’t be considered as instances of complaints or grievances;
- d. “**Insurance Products**” means the life, health, general and motor insurance products distributed by ABCDL;
- e. “**Grievance Redressal Officer**” or “**GRO**” means the officer designated by the Company under this Policy to oversee the redressal of Complaints relating to Insurance Products;
- f. “**IRDAI**” means the Insurance Regulatory and Development Authority of India;
- g. “**Board**” means the Board of Directors of ABCDL;
- h. “**Business Day**” means a day, other than a Sunday or a public holiday declared under the Negotiable Instruments Act, 1881 in the State of Maharashtra, on which ABCDL is open for business;

- i. **"Turn-Around-Time" or "TAT"** means the period prescribed under this Policy or under applicable regulations within which a Complaint is required to be acknowledged, updated or resolved; and
- j. **"User"** means a Customer or any other person who accesses or uses the Insurance Products or the digital platforms operated by ABCDL in connection with such products, and the expressions "User" and "Customer" are used interchangeably in this Policy.

3. OBJECTIVES OF THE POLICY

- 3.1. ABCDL places paramount importance on Customer service and satisfaction to acquire, retain and nurture an enduring relationship with the end users. The Company believes that providing prompt and efficient service is essential in the service industry. The broad objectives of the Policy are:
 - a. To ensure compliance with all the applicable regulations through the adoption of best practices while meeting business objectives;
 - b. To increase transparency, so that the Users can have a better understanding of what they can reasonably expect of the services;
 - c. To formulate and implement a grievance redressal framework for the Insurance Products distributed by the Company;
 - d. To treat Users in a fair and reasonable manner;
 - e. To provide various channels to raise any complaint/grievance;
 - f. To ensure Customer satisfaction and protection towards any frauds or misconducts;
 - g. To ensure that all Complaints are addressed according to the defined Turn-Around-Time (TAT) and Escalation matrix to the User's satisfaction; and
 - h. To ensure all the grievance/complaints raised are resolved in a seamless, efficient and effective manner.

4. REVIEW OF THE POLICY

- 4.1. ABCDL will review the Policy annually or earlier, if required, in light of any material changes in the regulatory framework or for business or operational reasons.

5. SCOPE

- 5.1. This Policy applies to all customers interacting with ABCDL in relation to life insurance products, health insurance products, general insurance products, and motor insurance products, and covers Complaints received through any of the channels specified in Clause 7.1.

6. GUIDING PRINCIPLES

- 6.1. ABCDL shall adhere to the following principles while handling customer grievances:
- a. **Fairness:** every complaint shall be dealt with objectively and impartially;
 - b. **Accessibility:** Customers shall have easy access to grievance registration channels;
 - c. **Responsiveness:** complaints shall be acknowledged and addressed;
 - d. **Transparency:** Customers shall be informed about the progress and status of their complaints;
 - e. **Confidentiality:** Customer information shall be protected and shared only on a need-to-know basis; and
 - f. **Regulatory Compliance:** all complaints shall be addressed in accordance with applicable laws and regulations.

7. CHANNELS FOR REGISTERING GRIEVANCES

- 7.1. Customers may register a Complaint through any of the following channels: (a) the Customer Care Helpline on the toll-free number **1800-270-7000**; (b) email to **care.digital@adityabirlacapital.com**; (c) the grievance registration facility on ABCDL's website at www.adityabirlacapital.com/abcd; (d) a written communication addressed to the Grievance Redressal Officer at the address set out in Clause 10.1; or (e) directly with the insurer whose Insurance Product is the subject matter of the Complaint, through the insurer's branch, website, call centre or email. A Customer may also register a Complaint online with IRDAI on the Bima Bharosa portal at <https://bimabharosa.irdai.gov.in/>. The helpline is available Monday to Friday, 9:30 AM to 6:00 PM, excluding national holidays; Complaints may be submitted through the email, website and written channels at any time. Customers are encouraged to provide the following details while lodging a complaint: customer name, registered mobile number, registered email ID, product/service details, the policy/application/reference number (if applicable), a detailed description of the grievance, and any supporting documents.

8. GRIEVANCE REDRESSAL PROCESS

8.1. Acknowledgment

Upon receipt of a grievance, an acknowledgment shall be sent to the customer through email, SMS, or any other appropriate communication channel, a unique complaint reference number shall be generated, and the complaint shall be recorded in the Company's grievance management system. Using the complaint reference number, the Customer may track the status of the Complaint through the Customer Care Helpline, the grievance tracking facility on ABCDL's website, or, where the Complaint

has been registered with or forwarded to the concerned insurer, on the insurer's grievance portal or the Bima Bharosa portal at <https://bimabharosa.irdai.gov.in/>.

8.2. Assessment and Investigation

The complaint shall be reviewed by the Customer Service Team and assigned to the relevant department for investigation. During the investigation process, additional information may be sought from the customer, internal records and supporting documents shall be reviewed, and relevant stakeholders shall be engaged to identify the root cause and appropriate resolution.

8.3. Resolution

Based on the findings of the investigation, appropriate corrective action shall be initiated, a reasoned response shall be communicated to the customer, and the customer shall be informed about the resolution and closure of the complaint. Where a Complaint is not resolved, or is accepted only in part or rejected, ABCDL will communicate to the Customer the reasons for such rejection with specific reference to the relevant terms and conditions of the Insurance Product, together with the options then available to the Customer, which include escalating the Complaint under Clause 9, registering the Complaint with IRDAI on the Bima Bharosa portal, referring the Complaint to the Insurance Ombudsman of competent jurisdiction, and approaching the Consumer Commission or any other forum having jurisdiction. Such communication will be made within 14 days from the original date of receipt of the Complaint.

8.4. Regulatory Timeline

ABCDL shall endeavour to resolve all grievances within the timelines prescribed under applicable regulatory guidelines and, in any event, not later than 14 calendar days from the date of receipt of the complaint, unless a different timeline is prescribed by the applicable regulator.

9. ESCALATION MATRIX

- 9.1. If the customer does not receive a response within 48 working hours or is not satisfied with the resolution provided, the grievance may be escalated as follows:

Level 1 Customer Care

Email: care.digital@adityabirlacapital.com

TAT: Response immediately and in any event within 48 working hours

Level 2 Grievance Redressal Officer

Email: abcdl.servicehead@adityabirlacapital.com

TAT: Response immediately and in any event within 48 working hours from the date of escalation

Level 3 Regulatory Authorities

In the event the customer remains dissatisfied after exhausting the Company's grievance redressal mechanism, the customer may approach the appropriate regulator, ombudsman, or dispute resolution

forum applicable, including the Insurance Ombudsman and the Insurance Regulatory and Development Authority of India (IRDAI):

- a. A Complaint may be registered with IRDAI through the Bima Bharosa portal at <https://bimabharosa.irdai.gov.in/>, by email to complaints@irdai.gov.in, or by calling the IRDAI Grievance Call Centre on 155255 or 1800 4254 732; and
- b. A Complaint may be referred to the Insurance Ombudsman having jurisdiction, under the Insurance Ombudsman Rules, 2017, where the Complaint remains unresolved for 30 days from the date of its registration or where the resolution offered is not acceptable to the Customer, provided the claim amount, including expenses claimed, does not exceed Rs. 50 lakhs. A Complaint may be made to the Insurance Ombudsman in person, online at <https://cioins.co.in/Complaint/Online>, or in writing by post or by email, in each case giving complete details. The name and address of the Insurance Ombudsman of competent jurisdiction will also be set out in the resolution letter issued by ABCDL to the Customer, and the contact details of all Insurance Ombudsman offices are available at <https://www.cioins.co.in/Ombudsman>.

10. GRIEVANCE REDRESSAL OFFICER

- 10.1. The Company has appointed a Grievance Redressal Officer to oversee customer grievance management and regulatory compliance in relation to Insurance Products:

Name: Ms. Sujatha Aroon

Designation: Grievance Redressal Officer

Address: 18th Floor, One World Center, Tower 1, Jupiter Mills Compound, 841 Senapati Bapat Marg, Elphinstone Road, Mumbai – 400013, Maharashtra

Email: abcdl.servicehead@adityabirlacapital.com

Contact Number: 022-65022749

11. COMPLAINT CLOSURE

- 11.1. A complaint shall be treated as closed when the final resolution is provided by ABCDL, or the customer has not responded within a reasonable period following communication of the final resolution, or the matter has been resolved in accordance with applicable regulations and documented appropriately. Records of all grievances, investigations, actions taken, and closures shall be maintained for regulatory and audit purposes.

12. MONITORING AND REPORTING

- 12.1. ABCDL shall maintain a centralized grievance management system, monitor complaint trends and root causes, conduct periodic reviews of unresolved complaints, present grievance reports to senior management as required, and implement corrective and preventive actions to enhance customer experience and reduce recurrence of complaints.

- 12.2. ABCDL is committed to ensuring fair, transparent, and timely redressal of customer grievances. Every customer complaint is viewed as an opportunity to improve our products, processes, and service standards while strengthening customer trust and confidence. For any assistance regarding grievances relating to Insurance Products, customers may contact us at email care.digital@adityabirlacapital.com, phone 1800-270-7000, or via our website www.adityabirlacapital.com/abcd.