EURASIA INSURANCE COMPANY JSC IFSC INSURANCE OFFICE (IIO) BRANCH
POLICY ON HANDLING OF COMPLAINTS AND GRIEVANCE REDRESSAL

Document History

Sr. No.	Version No.	Effective Date	Prepared By	Reviewed By
1	1.0	04/06/2026	Zhumadilova A.B. – Senior Specialist of Legal Department of Eurasia Insurance Company Joint Stock Company	By the decision of the Board of Eurasia Insurance Company Joint Stock Company dated 04/06/2026.

1. Preamble

1.1. Eurasia Insurance Company JSC IFSC Insurance Office (IIO) Branch, a branch of the IFSC, is duly registered with the International Financial Services Centres Authority (IFSCA or the Regulator) under the IFSCA (Insurance Business Registration) Rules 2021 (the Rules).

1.2. In accordance with the IFSCA Circular "Complaints and Dispute Resolution by Regulated Entities before the IFSC" dated 2 December 2024 (the "Circular"), the IIO has developed a Policy on handling of complaints and grievance redressal (the "Policy"), approved by the Board of Directors of Eurasia Insurance Company JSC, which defines the IIO's mandate to effectively handle consumer complaints, ensure timely dispute resolution, and comply with IFSCA regulatory requirements.

1.3. IIO strives to provide a fair, transparent, and effective mechanism for handling complaints and disputes from its consumers in accordance with the Circular. This Policy sets out the procedures and governance structure for handling complaints and resolving disputes.

2. Purpose

2.1. The purpose of this Policy is to protect the interests of consumers of IIO's financial services. This Policy ensures an effective and efficient complaints and dispute resolution mechanism. It provides a clear framework for the fair and transparent receipt, processing, and consideration of complaints, as well as for the timely resolution of disputes.

2.2. When developing its complaints and dispute resolution framework, IIO is guided by the objectives of this Policy. The framework should be appropriate to the nature of the complaints, the consumers involved, and the overall functioning of IIO. It should ensure a balanced approach that takes into account consumer protection, operational efficiency, and regulatory compliance.

3. Applicability

This Policy applies to all complaints received from consumers of IIO's financial services, excluding IIO affiliates. It applies to all financial services provided by IIO. This Policy establishes a broad framework for protecting the interests of consumers of IIO's financial services. It provides an effective and efficient complaints and dispute resolution mechanism. It provides a clear framework for the fair and transparent receipt, processing, and resolution of complaints.

4. Definitions and Terms

1. A "complaint" may be defined as any expression of dissatisfaction by a Consumer regarding a financial product, service, or action of an IIO.

The list of issues that are not considered a "complaint," according to the Circular:

1) Anonymous complaints (excluding whistle-blower complaints);
2) Incomplete or vague complaints;
3) Allegations without supporting documents;
4) Suggestions or requests for guidance/clarification;
5) Complaints regarding issues unrelated to financial products or services provided by the IIO;
6) Complaints regarding any unregulated/unregulated activity;
7) Requests for information or clarification regarding financial products or services.

2. "Complaint Redressal Appellate Officer" or "CRAO" - an IIO employee authorized to consider consumer complaints against a decision made by an IIO employee responsible for handling complaints.
3. "Complaint Redressal Officer" or "CRO" - a senior IIO employee responsible for handling complaints from consumers.
4. "Consumer", "Client" or "Customer" - a person who participates in a financial transaction or activity with an IIO, as well as a person on whose behalf a person participating in a transaction or activity with an IIO acts.

5. Appointment of Responsible Persons

1. The IIO appoints a Complaint Review Officer (CRO) responsible for the initial receipt, investigation, and coordination of responses to complaints received.
2. The IIO appoints a Complaint Review Appeals Officer (CRAO) to review repeated complaints.

6. Complaint Handling Procedure

1. Upon receipt of a complaint, the IIO determines its validity and significance.
Based on its assessment of the validity and significance of the complaint, the IIO acknowledges receipt of the complaint in the following ways:
a) If the complaint is accepted, the IIO acknowledges its receipt in writing within 3 (three) business days of receipt.
b) If the complaint is rejected, the CRO informs the complainant within 5 (five) business days of receipt of the complaint, stating the reasons for the decision.
2. The IIO will handle the complaint in a fair, transparent, professional, and impartial manner.
3. The CRO has the authority to resolve the complaint or access to other employees who can handle it impartially.
4. If the CRO is or has been involved in the financial transaction that is the subject of the complaint, the matter will be referred to another designated official for further review in a fair and impartial manner.
5. During the complaint review process, the IIO may request additional information from the complainant to better understand the issue.
6. Complaints are reviewed by the IIO within 15 (fifteen) days of receipt of the complaint, but no later than 30 (thirty) days of receipt.
7. The complaint may be either reviewed or dismissed within the timeframe specified in Section 6, Paragraph 6 of the Policy.
8. If the complaint is dismissed, the IIO will provide the complainant with a written explanation of the reasons for dismissal.

7. Appeal Mechanism

1. If a complainant is dissatisfied with the decision made by the CRO, or if the complaint is rejected by the CRO, they may file an appeal with the CRAO, preferably within 21 (twenty-one) days of receiving the decision from the CRO. The CRAO will review and decide on the appeal within 30 (thirty) days of its submission.

2. If, after exhausting the internal appeal mechanism, the dispute is not resolved, the Complainant has the right to file a complaint directly with the IFSCA regulator within 21 (twenty-one) days.

8. Data recording and storage

1. IIO maintains a record of all complaints received, including:
1) complaints received and processed;
2) correspondence between IIO staff and applicants;
3) information and documents used in processing complaints;
4) results of consideration of complaints;
5) reasons for rejecting complaints, if any;
6) deadlines for processing complaints; and
7) data on all complaints considered.
2. Records must be stored electronically for at least 6 (six) years from the date of consideration of the complaint.
3. In the event of any pending litigation or legal process related to a complaint, a record of the complaint shall be retained until the matter is finally resolved.

9. Reporting and disclosure

The IIO includes a section on “Grievance Handling and Claim Resolution” in its annual report, detailing the number of complaints received, reviewed, rejected and pending.

10. Other

1. This Policy, as well as the full names and contact information of the CRO and CRAO, are posted on the web-page of Eurasia Insurance Company JSC in the section "Complaint Handling and Grievance Redressal".
2. This Policy has been approved by the Board of Directors of Eurasia Insurance Company JSC. This Policy is subject to revision by the Board of Directors of Eurasia Insurance Company JSC as necessary.