



Grievance & Dispute Resolution Policy

DEC 2025

Fintech Association for Consumer Empowerment (FACE)
RBI-recognised Self-regulatory Organisation in the FinTech Sector (SRO-FT)

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1. Version

The Fintech Association for Consumer Empowerment (FACE) developed and published this policy, version 1.1, with the board's approval¹.

2. Context

FACE is a self-regulatory industry association uniting FinTechs. Amongst other things, FACE provides a platform for members to resolve their disputes fairly, transparently, and efficiently. As per the FACE [Article of Association](#) and [RBI's Framework for Recognising Self-Regulatory Organisation \(s\) for FinTech Sector](#), this Grievance and Dispute Redressal Policy (Policy) outlines the framework for addressing some specific non-financial disputes and grievances amongst the members.

3. Applicability

This policy applies to the members of FACE. It includes the formal dispute between members where a member seeks redressal using the SRO GDR Platform. However, it excludes

- grievances and disputes that are commercial² or anonymous or relate to disputes between officers, directors, employees, part-time staff, interns, and/or agents with one or more member companies.
- any matter that is sub-judice or under regulatory review will not be covered by this policy, unless authorised by the regulator to assess.
- whistleblowing

4. Types of Grievances

Types of such non-financial disputes and grievances include, but are not limited to, the following. Disputes and grievances can be bilateral or generic, based on market inputs.

- Non-compliance with laws and regulations
- Non-compliance with FACE codes of conduct/standards and membership agreements.
- Non-compliance with the codes of conduct and fair practices code under the bilateral agreement between the members.
- Adverse conduct by members, such as advertising, marketing, pricing, data collection and use, disclosures, and recoveries/collection practices.
- Breach and/or violation of contract or NDA amongst members or with FACE,
- Breach and/or violation of arrangements, confidential and proprietary information, security, data privacy, etc.
- Failure to preserve documents and data in accordance with the legal/regulatory obligation and as per the bilateral agreement between the members.
- Non-financial malpractices, including anti-competition, fraud, malfeasance, corruption, bribery, theft, etc.
- Inadequate disclosures, including conflict of interest.
- False reporting and concealing material facts.
- Unethical employee practices.
- Unlawful activities.
- Any conduct that is considered to be detrimental to the fintech sector (non-commercial).

¹ Board approved the policy in its meeting held on 19 Dec 2025.

² Examples like delayed or inadequate payments in breach of contracts or agreed milestones.

5. Nodal Officer

- FACE shall designate an employee of sufficient seniority, competence, and independence as the nodal officer responsible for accepting the members' disputes/grievances under policy.

6. Registration

- A member (complainant) can raise a grievance or dispute in good faith, without malice, and with reasonable grounds for suspecting misconduct by sending an email to sro@faceofindia.org or other digital channels as prescribed.
- Only an authorised representative of a member may fill out a form and interface for subsequent requirements. The members will submit all relevant details of the dispute/grievance and necessary documentary evidence to support the same.
- FACE has the right to charge a reasonable fee to register a dispute and grievance as per information available on the FACE website.

7. Evaluation

- The complaints received from members will be evaluated and reviewed by L1 (level 1) by the nodal officer at FACE. Frivolous or malicious complaints, such as those lacking evidence, filed in bad faith, or intended to harass, retaliate, or obstruct the process, will be rejected, and the complainant will be informed.

Level 1

- Complaints/grievances/disputes are reviewed and evaluated at L1 by a nodal officer with the CEO for preliminary investigation and evaluation to determine whether any of those complaints/grievances/ disputes need to be escalated to L2 or can be resolved/disposed of at L1. The nodal officer may use ODR-enabled tools such as secure chat rooms, document repositories, and guided questionnaires to assess and investigate the complaint/dispute at hand.
- For such review, if the case requires it and is legal in nature, then FACE may engage with legal personnel³ who understand the legality of such issues.
- All complaints/grievances/disputes resolved/rejected/disposed of at L1 will be reported in real-time to L2 for information.
- If a complainant is unsatisfied with the decision at Level 1, they can appeal to L2.

Level 2

- The complaints/grievances/disputes received from members that are tagged as L2 will be evaluated by the FACE Grievance and Dispute Redressal Committee (GDRC) that will comprise of the Independent Board Directors from FACE Board and individuals drawn/invited from relevant experience⁴ related to disputes under consideration. If the case requires a review and is legal in nature, FACE may engage with legal personnel who understand the legality of such issues.
- The GDRC, in turn, evaluates each complaint/grievance/dispute to check materiality and

³ FACE will have a pool of empanelled legal professionals to seek advice across themes

genuineness. GDRC will set the criteria for accepting or rejecting a complaint/grievance/dispute based on materiality and the expertise available to GDRC to handle a specific dispute, taking into account the relevant considerations.

- The GDRC may seek additional information from the concerned members and engage with them individually or collectively.
- Accepted complaints undergo examination in consultation with both parties. If necessary, professional arbitrators and mediators can be engaged, and concerned companies must mutually agree to pay for the services and expenses incurred in the process. Use of ODR platforms will help conduct virtual mediation via secure conferencing tools.
- Post investigation, the GDRC informs the complainant about their decision. Decisions might include an advisory or warning, a corrective action plan, temporary restrictions, mandated training or compliance checks, and recommendations for further action by the Board.
- The decision of the GDRC will be final and binding on the parties.
- If the complainant or the accused party is dissatisfied with the GDRC’s decision, they can seek independent legal recourse through judicial and government tribunals, etc.

8. Responsibilities

Parties

- Respond to nodal officer and GDRC as per timelines
- Furnish complete and truthful documents
- Good-faith participation in mediation or conciliation.

GDRC

- Adhere to timelines for acknowledging, investigating, and resolving each complaint, ensuring timely and consistent handling.
- Support a safe-harbour environment that protects individuals or teams who proactively disclose issues, lapses, or inconsistencies during the process.
- Maintain neutrality and procedural integrity, ensuring that every party is treated fairly, heard adequately, and evaluated objectively based on evidence and substance.
- Set up measures against repeated misuse of the GDR platform, including malice and bad faith.
- Maintain strict confidentiality regarding any information shared during the grievance and dispute resolution.
- Digitally record all complaints/grievances/disputes, evidence, decisions taken, appeals, TAT, etc, maintaining audit trails.
- Extract systemic learnings from disputes and use them to strengthen broader sectoral standards by conducting periodic learning sessions or issuing guidance notes informed by recurring dispute patterns.

9. Escalation

Escalation levels	Resolution time	Contact details	Escalation/appeal
Level 1	15 working days	sro@faceofindia.org	gdr@faceofindia.org
Level 2	60 working days	gdr@faceofindia.org	

10. Digital Dispute Resolution and ODR Pathways

- The grievance and dispute resolution amongst members will follow the digital process in its entirety from the receipt of complaints, evidence⁵, communication and mediation meetings and hearing etc.
- Based on the volume of cases, the FACE may embed Online Dispute Resolution (ODR) pathways into the process to promote speed and auditability, reducing friction. The entire evaluation process can be recorded, time-stamped, and managed on a digital ODR platform to ensure transparency, auditability, and data integrity. For this purpose, FACE will use accredited ODR platforms, aligned with the Mediation Act, 2023.

11. Others

- Policy will align and adhere to Regulatory directions under SRO-FT, THE ARBITRATION AND CONCILIATION ACT, 1996 and THE MEDIATION ACT, 2023.
- It will apply in conjunction with FACE Policy documents such as the AoA, Conflict of Interest Management, Membership Agreement, and Privacy.
- To enhance external confidence and internal discipline, FACE will publish an anonymised, aggregated grievance report periodically including metrics such as a) number of cases filed, disposed, pending, b) types of disputes and c) average resolution timelines.

12. Amendments

- Review the policy at least annually for regulatory/legal requirements, association needs, and process improvements.
- Submit the proposed amendments to the Board, outlining the changes' rationale, benefits, potential impact and document decisions for approval.

⁵ For example, audit trails, logs, screenshots, metadata, etc