

Date: 27th May 2026

To

The Board of Directors

Turtlemint Fintech Solutions Limited (Formerly known as Fintech Blue Solutions Private Limited)

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Maharashtra, India

ICICI Securities Limited

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JM Financial Limited

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Motilal Oswal Investment Advisors Limited

Motilal Oswal Tower,
Rahimtullah Sayani Road,
Opposite Parel ST Depot, Prabhadevi,
Mumbai 400 025,
Maharashtra, India

(ICICI Securities Limited, Jefferies India Private Limited, JM Financial Limited and Motilal Oswal Investment Advisors Limited are collectively referred to as the "Book Running Lead Managers" or the "BRLMs")

Ladies and Gentlemen

Subject: Proposed initial public offering of equity shares of face value of Rs. 1 each ("Equity Shares") by Turtlemint Fintech Solutions Private Limited [Formerly known as Fintech Blue Solutions Private Limited] (the "Company") and such offering (the "Offer")

With reference to the captioned matter, we Redseer Strategy Consultants Private Limited ("**We/Redseer**"), hereby accord our no-objection and our consent to: (i) use of and references to our names to the extent of the information provided by us in our report titled "Industry Report on Indian Insurance Distribution Market" dated 27th May, 2026 and enclosed herewith as **Annexure A (the "Report")** (ii) inclusion, quoting of information or reproduction of content in relation to our Report (in its entirety or any portions thereof) including its contents or any extract thereof, being included in the Updated Draft Red Herring Prospectus-II ("**UDRHP-II**") intended by to be filed by the Company with the Securities and Exchange Board of India the ("**SEBI**"), BSE Limited ("**BSE**") and National Stock Exchange of India ("**NSE**") and any other relevant stock exchange(s) where the Equity Shares of the Company are proposed to be listed ("**Stock Exchanges**"), the red herring Prospectus ("**RHP**") and the prospectus ("**Prospectus**") each of which the Company intends to file with Registrar of Companies, Mumbai - I at Mumbai ("**RoC**"), and thereafter with SEBI and the Stock Exchanges and any addenda, corrigenda, or preliminary international wrap, internal wrap and any international supplements or notices to the

UDRHP-II or the RHP or the Prospectus for distribution to investors outside India prepared by the Company or the BRLMs in connection with Offer (collectively, the “**Offer Documents**”) and in any other documents including investor presentations, roadshow presentations, corporate presentations, research reports, analyst reports, annual reports, or other marketing material prepared by the Company or the BRLMs and in any written correspondences with SEBI and Stock Exchanges, on each case in connection with the Offer (collectively, together with the Offer Documents, the “**Offer Materials**”).

We acknowledge and agree that such disclosures would be made only as deemed fit by the Company and the BRLMs and this letter does not impose any obligation on the Company and/or BRLMs to include the Report in any Offer Materials or any part of the Report with respect to which consent for disclosure is being granted pursuant to this letter.

We also confirm that we are independent consultants with respect to the Company and its associates. We confirm that we are not, and have not in the past, been engaged or interested in the formation, or promotion, or management, of the Company. We also confirm that we do not have any other business relationship with the Company other than as set out in the engagement letter dated 1st April 2025 (“**Engagement Letter**”). We confirm that as per our records, none of the Company, its directors, key managerial personnel, members of senior management personnel, its promoter(s), or the BRLMs to the Offer, as listed out in **Annexure B**, is a related party with respect to us, as per definition of “related party” provided under the Companies Act, 2013 and the Securities and Exchange Board of India (Listing and Disclosure Requirements) Regulations, 2015, each as amended, as on date of this letter. We also confirm that we do not perceive any conflict of interest while issuing the Report. We further confirm that other than in the ordinary course of commercial transactions, we do not have any relationship with the BRLMs.

We confirm that we do not have any relation with the Company, its directors, its promoters, its promoter group, its key managerial personnel and senior management personnel and the selling shareholders as listed out in **Annexure B**, nor the BRLMs to the Offer except for preparation of the Report.

We also give our consent to include the Report, the Engagement Letter (included as Annexure C and this letter as part of the section titled “*Material Contracts and Documents for Inspection*” in the UDRHP-II, RHP and Prospectus which will be available for public inspection from the date of filing of the RHP until the Bid/Issue Closing Date and have no objection with you sharing the Report with any regulatory or judicial authority as required by law or regulation in relation to the Offer. Further, we consent to include a weblink to the Report and this letter in the Offer Documents in order to enable access thereto on the website of the Company. We also consent to disclose the date of its appointment pursuant to engagement letter dated 1st April 2025 for the purpose of preparing/commissioning this Report, in the Issue Documents. We further consent to this certificate being uploaded, as may be necessary, on the online document repository platform of the stock exchanges in terms of applicable law.

Subject to compliance with the terms hereof, we further confirm that there are no further consents, permissions, approvals or intimation required for reproducing the information contained in the Report in any Offer Documents. This consent will remain valid unless withdrawn in writing by us.

We confirm that we and our associate company/ies (as defined under the Companies Act, 2013) do not hold any Equity Shares of the Company.

We confirm that all information contained in the Report has been obtained by us from sources believed by us to be true and reliable and after exercise of due care and diligence by us. We further confirm that we have, where required, obtained requisite consent that may be required from any authority or any other person in relation to any information used by us in the Report. We further confirm that the above information in relation to us is true, fair and correct and there is no untrue statement or omission which would render the contents of this consent letter misleading in its form or context. The Report is not a recommendation to invest/disinvest in any entity covered in the Report and the Report should not be construed as investment advice within the meaning of any law or regulation. RedSeer has prepared this report in an independent and objective manner, and it has taken all reasonable care to ensure its accuracy and completeness.

We represent that our execution, delivery and performance of this consent letter have been duly authorized by all necessary actions (corporate or otherwise).

We confirm that we will immediately communicate any changes in writing in the above information to the Company, BRLMs until the date when the Equity Shares that are allotted and/ or transferred in the Offer, commence trading on the Stock Exchanges. In the absence of any such communication from us, BRLMs and the legal counsels, each to the Company and the BRLMs, can assume that there is no change to the above information until the Equity Shares commence trading on the Stock Exchanges pursuant to the Offer.

For the sake of clarity, this consent letter does not provide the right to the Company to name us as an expert on the Offer Documents.

Please ensure that wherever information from the Report is used in the Offer Materials or such other presentations, (i) proper reference of the Report as the source of such information is cited along with; and (ii) the Company should ensure that the information is presented in the same context as that in the Report and should not be selectively extracted and used in a manner that distorts the views expressed by us in the Report.

This consent letter can be relied on by the Company, the BRLMs and the legal advisors to each of the Company and the BRLMs. We hereby consent to the submission and disclosure of this consent letter and the Report as may be necessary to the SEBI, the Stock Exchanges, and any other legal, governmental, regulatory or judicial authorities and/or for any other litigation as may be required.

We agree to keep the information regarding the Offer, your request and this consent letter in relation to the offer are strictly confidential.

This consent letter, including any annexures hereto, is for information and for inclusion (in part or full) in the Offer Documents or any other Offer-related material, and may be relied upon by the Company, BRLMs and the legal counsel to each of the Company and the BRLMs in relation to the Offer.

All capitalized terms used herein and not specifically defined shall have the same meaning as ascribed to them in the Offer Documents, as the case may be.

Yours faithfully,

For Redseer Strategy Consultants Pvt Ltd



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Partner

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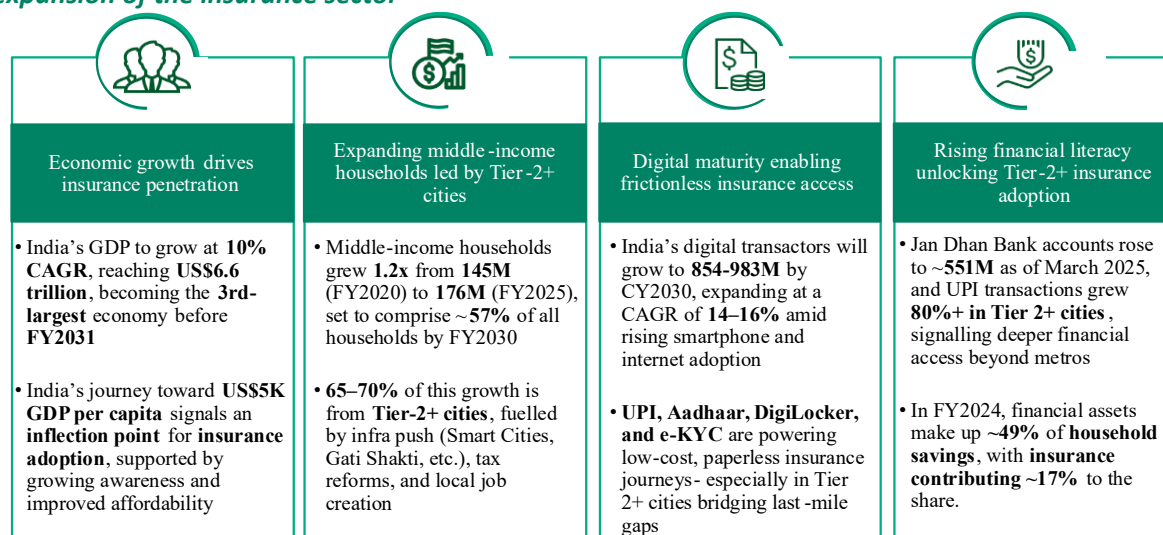
Annexure A

Industry Report on Indian Insurance Distribution Market

Chapter 1: India's economic growth & income trends provide a strong foundation for the expansion of the insurance sector

India, the fastest-growing major economy, is fuelled by a young and growing middle-income population with a higher earning and spending propensity. This is accelerating the formalization of the economy and driving widespread adoption of financial products. Growing digital penetration is further democratizing access to financial products across income and city tiers. These trends are collectively fostering a financially savvy, digitally empowered population with increasing purchasing power, creating strong momentum for rapid growth in financial products.

Figure 1: India's macroeconomic fundamentals are strongly positioned to support the growth and expansion of the insurance sector



Source(s): Redseer research and analysis

1.1. Macroeconomic fundamentals are enabling robust economic growth

As of Fiscal Year ("FY") 2025 and FY2026, India's nominal Gross Domestic Product ("GDP") is estimated at approximately ₹332 trillion (US\$ 3.91 trillion) and ₹351 trillion (US\$4.1 trillion) respectively, ranking it as the fifth-largest economy globally, as per data from the International Monetary Fund ("IMF"). Over the past five years (FY2021-FY2026), India has maintained a strong growth trajectory with a Compound Annual Growth Rate ("CAGR") of ~9%. Projections indicate that by FY2031, India's GDP will reach ₹563 trillion (US\$6.6 trillion), expanding at an estimated CAGR of ~10% from FY2025 onward.

This rapid growth rate, the highest among major global economies, is expected to propel India ahead of Germany, and will be the world's third-largest economy by FY2031.

Figure 2: India is projected to become the 3rd largest economy by FY2031, with a 1.6x increase in the nominal GDP, the fastest among the major economies, to reach US\$6.6 trillion

Nominal GDP - Global Benchmarks

Country	CY2025 Rank	CY2030P Rank	Change in rank	Nominal GDP CY2025 (US\$ trillion)	Nominal GDP CY2030P (US\$ trillion)	Growth
 US	1	1	↔	30.6	36.8	1.2
 China	2	2	↔	19.4	26.3	1.4
 Germany	3	4	↓	5.0	6.0	1.2
 India	5	3	↑	4.1	6.6	1.6x
 Japan	4	6	↓	4.3	5.1	1.2
 UK	6	5	↓	4.0	5.2	1.3

Note(s): 1. For India FY2026 and FY2031 considered, for other economies, CY2025 and CY2030 are considered

Source(s): World Economic Outlook, October 2025, International Monetary Fund ("IMF"), Redseer research and analysis

India's GDP per capita is projected to reach approximately ₹0.24 million (around US\$2,818) in FY2026, indicating a structural shift in consumption patterns. Historically, when countries cross the US\$2,000 threshold, discretionary spending tends to surge. For instance, China saw its private consumption grow at a ~20% CAGR over the five years following its crossing in CY2006. India crossed this milestone in FY2022 and has since grown at a ~6% CAGR. However, its per capita income still lags significantly behind that of China (US\$13,806), the UK (US\$56,661), and the US (US\$89,599) in CY2025. While these developed economies benefit from extensive social protection systems that further boost disposable income, India's trajectory highlights significant organic headroom for consumption-led growth despite limited social coverage.

Private Final Consumption Expenditure ("PFCE"), the largest GDP component, has grown at ~11% CAGR over FY2020–25, from ₹122.4 trillion (US\$1.4 trillion) to ₹203.0 trillion (US\$2.4 trillion), with discretionary spending rising to ~48% of total consumption (vs. 40-43% a decade ago), reflecting a clear shift toward lifestyle and experiential categories.

As income rises, protection-linked spends grow. Swiss Re's S-curve shows non-life insurance penetration accelerates post US\$5,000 GDP per capita. China's penetration rose from 1.2% in CY2011 to 1.8% by CY2016 after crossing this mark. India is expected to follow a similar trajectory, approaching this inflection in the next decade, driven by a growing middle class, expanding insurable assets, and improved product affordability. Both India and China are currently in the fast-expansion zone of the S-curve for insurance adoption.

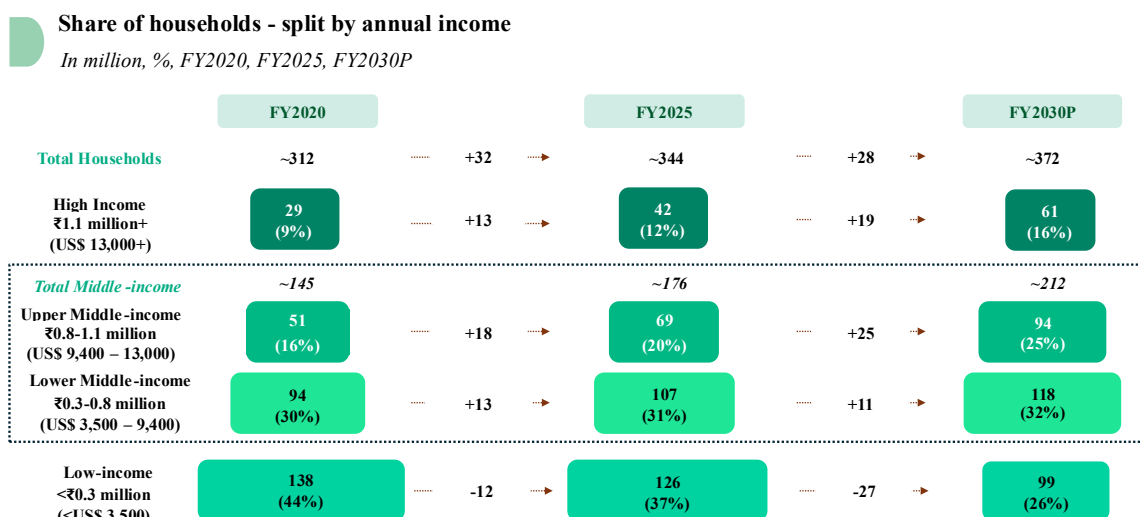
1.2. Rising incomes are driving the expansion of middle-income households across various city tiers

India is witnessing rising incomes, driven by strong economic expansion, a growing workforce, and gains in productivity through urbanization and technology adoption. As per Ministry of Statistics and Programme Implementation (MoSPI), India's Gross National Income per capita reached ₹0.23 million

(US\$2,666) in FY2025, growing at a ~8.6% CAGR since FY2020 as one of the fastest rates among comparable economies.

Rising incomes are driving the expansion of India's emerging middle-income segment, reshaping household demographics and spending patterns. The number of middle-income households, comprising both upper and lower middle-income segments, has grown ~1.2x from 145 million (46% of all households) in FY2020 to 176 million (51% of all households) in FY2025. By FY2030, this segment is projected to reach ~57% of all households, comprising ~212 million households.

Figure 3: India is projected to add ~36 million middle-income households between FY2025 and FY2030P, the highest among all income classes, while low-income households shrink by ~27 million



Note(s): (1) Incomes are calculated based on real wage growth and account for wage inflation (2) P- Projected (3) Conversion rate of US\$ 1 = ₹85

Source(s): Redseer research and analysis

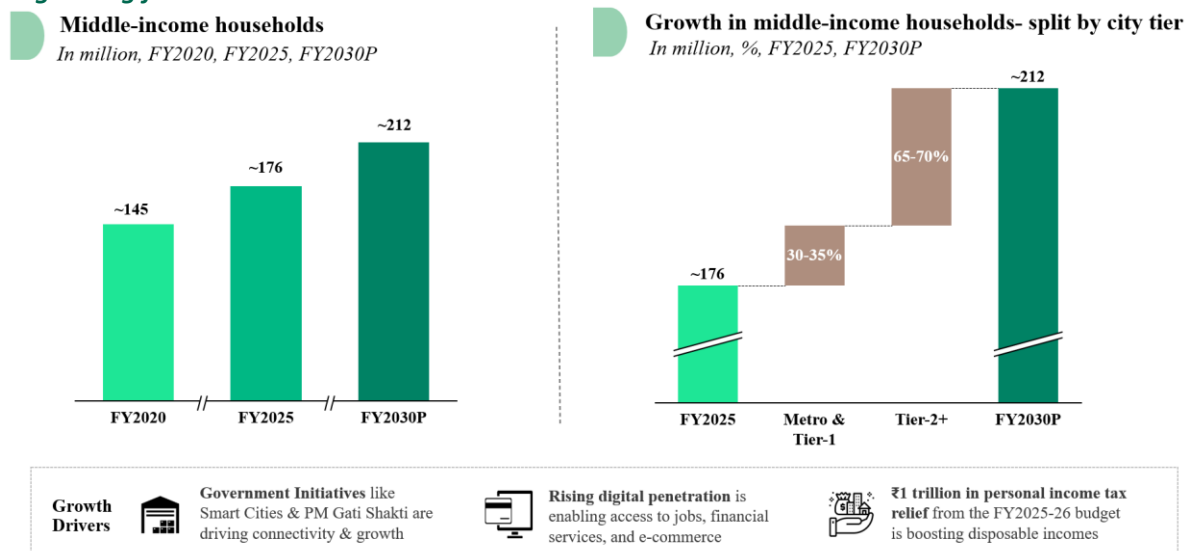
This growth is expected to originate from a couple of factors:

1. Growth from Tier 2+ cities to contribute 65-70% of the growth in middle income households by FY2030

India's expanding middle-income segment is expected to be led by Tier 2+ cities, projected to contribute 65-70% of new households. These cities, driven by sectors like textiles and IT, already account for ~72% of the retail market and will house ~83% of Indian households by FY2030.

Rural consumption is also rising, with monthly household spends up 70% from FY2017 to FY2022, and household savings improving to 66%. This shift is supported by infrastructure programs, digital access, tax relief, and formal employment and skilling initiatives enhancing income stability and financial access (to credit, insurance, etc.). Additionally, lower operational costs in these cities, availability of skilled talent, and growing sectoral diversification by corporates are further contributing to the region's economic upliftment and attractiveness.

Figure 4: Middle income households are set to reach ~212 million by FY2030 with 65-70% growth originating from tier 2+ cities



Note(s): (1) Tier 2+ refers to cities with a population of less than 1 million (2) Tier 1 refers to cities with a population of more than 1 million, excluding metro cities (3) Metro cities indicate 8 cities, namely – Mumbai (Maharashtra), Delhi (NCT), Bangalore (Karnataka), Chennai (Tamil Nadu), Hyderabad (Telangana), Kolkata (West Bengal), Pune (Maharashtra) and Ahmedabad (Gujarat) (4) P - Projected

Source(s): Redseer research and analysis

2. A rising young and skilled workforce is driving higher household incomes

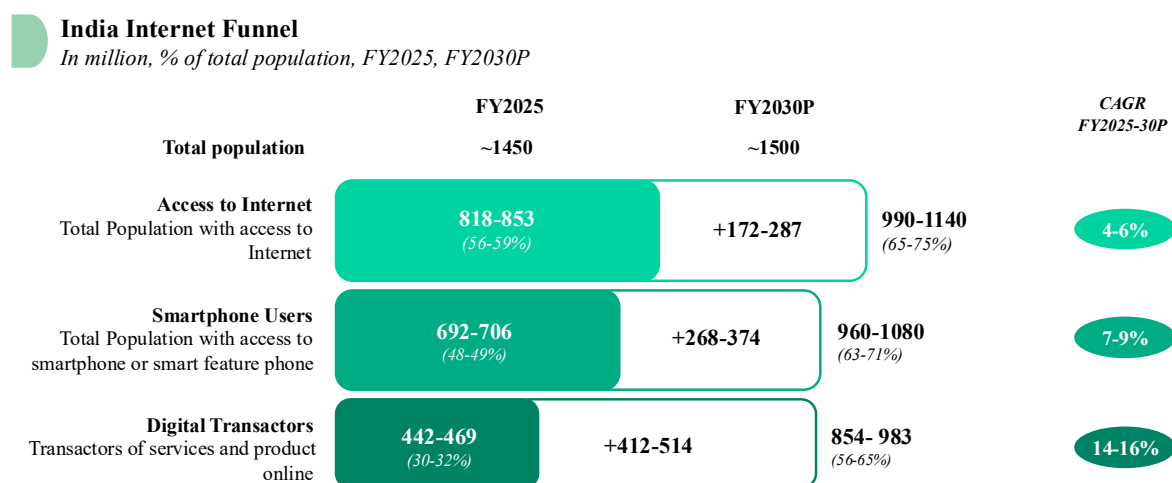
India's young demographics are expanding the middle-income base, with the 20-59 age group forming ~54% of the population and labour force participation rising to 60% in FY2024. Improving literacy and a large English-speaking workforce are boosting earning and spending capacity. Rising formal employment is also increasing insurance adoption via group policies. Asset ownership is rising in parallel with retail automobile¹ sales growing from 20.8 million in FY2020 to 24.7 million in FY2025 as per the Society of Indian Manufacturers ("SIAM"), reflecting aspirational consumption and expanding the insurable base, especially in rural and semi-urban markets.

1.3. India's rapidly expanding digital ecosystem is reshaping the consumer economy

As of FY2025, India's internet user base is estimated to be 818-853 million, projected to reach 990-1,140 million by FY2030 penetrating 65-75% of the population. Smartphones are now the primary mode of internet access, with users expected to grow from 692-706 million in FY2025 to 960-1,080 million by FY2030, a 7-9% CAGR increase.

¹ Includes passenger vehicles, three-wheelers, two-wheelers, and quadricycles and excludes only commercial vehicles

Figure 5: India's digital population is expected to grow significantly by FY2030, with access to the internet to reach an estimated 65-75% of the population



Note(s): P- Projected

Source(s): Redseer research and analysis

India's rapid digital adoption is driven by four key enablers:

- Affordable internet access:** India's data prices average ~₹14 (US\$0.16) per GB which are far below the global average of ~₹222 (US\$2.61), driving rapid smartphone adoption across city tiers. The rollout of 4G/5G has further expanded high-speed internet access and digital inclusion.
- Low-cost smartphones:** Unlike developed markets that transitioned from personal computers to mobile, India leapfrogged to smartphones due to affordability. As per IDC Quarterly Mobile Phone Tracker, the average smartphone price in India is ~US\$274 vs. ~US\$434 globally.
- Policy and regulatory support:** Programs like Digital India, BharatNet, and PMGDISHA have expanded connectivity and digital trust, while frameworks such as the Digital Personal Data Protection Bill strengthen secure digital participation.
- Robust Digital Public Infrastructure ("DPI"):** The Aadhaar-enabled DPI stack (e-KYC, UPI, DigiLocker, etc.) enables seamless payments, identity verification, and access to services, forming the backbone of digital delivery.

Together, this ecosystem is unlocking financial inclusion and digital adoption. Consumers are increasingly drawn to digital-first experiences across payments, commerce, mobility, and utilities, creating multiple entry points into the formal financial ecosystem.

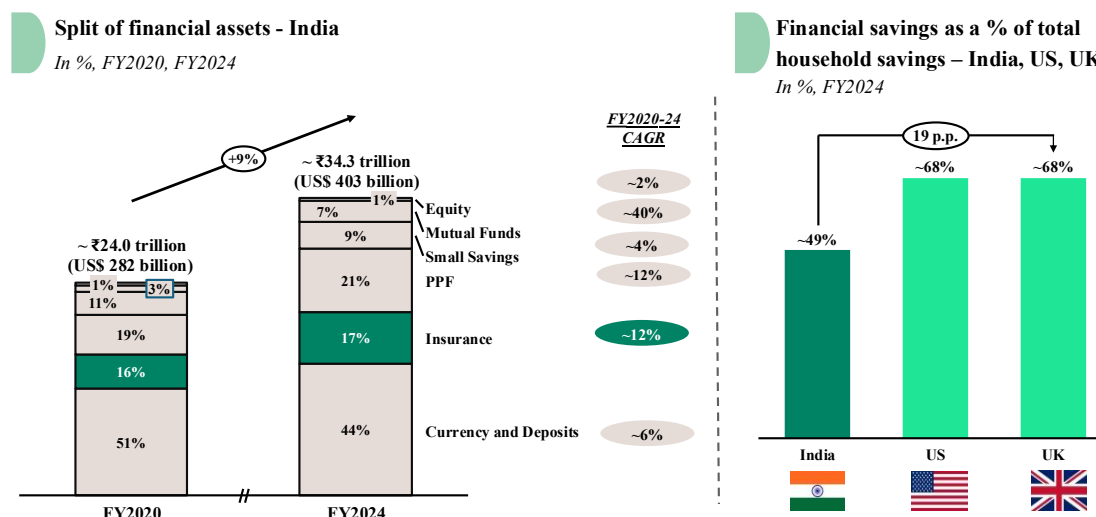
1.4. Rising income and digitization are enabling rapid financial inclusion but there remains headroom for growth

Gross savings of the household sector in India have grown at a constant CAGR of ~9% from FY2020-24 and is estimated to be ~₹54.6 trillion according to the second advance estimates of annual gross domestic product by MoSPI. This sustained growth underscores a strengthening savings culture among Indian households.

Financial assets, which include equities, mutual funds, insurance, currency, and other instruments account for ~49% of Indian household savings in FY2024. Within financial assets, insurance has grown

at a healthy CAGR of ~12% between FY2020 and FY2024. However, a strong preference for physical assets persists, indicating substantial headroom for further financialization. In comparison, mature markets like the US and UK allocate a significantly higher share of household savings to financial assets at ~68% each, as of FY2024 signalling headroom for growth.

Figure 6: Indian households are increasingly investing in financial assets, with significant headroom for growth compared to developed markets like the UK and US



Note(s): (1) Physical assets include - Property & gold; (2) Financial assets include – Currency & deposits, Insurance, mutual funds, equity, Provident fund, other fixed income instruments, etc. (3) Conversion rate of US\$ 1 = ₹85 (4) Percentages may not sum to 100% owing to rounding differences.

Source(s): RBI, Federal Reserve System, Office of National Statistics, Redseer research and analysis

This shift towards financial assets is being driven by a combination of evolving consumer behaviour and supportive policy initiatives aimed at steering the country in that direction.

- Rising financial awareness in Tier-2+ cities:** Increasing digital access, youth-led demographics, and focused financial inclusion efforts have deepened engagement with formal financial products. The RBI's Financial Inclusion Index rose from 43.4 in FY2017 to 67.0 in FY2025, reflecting progress across access, usage, and quality. Programs like Jan Dhan Yojana (with accounts growing from 383 million in FY2020 to 551 million in FY2025 with 67% from rural/semi-urban areas) and the JAM trinity (Jan Dhan, Aadhaar, Mobile) have laid the foundation for digital financial inclusion.
- Greater comfort with digital finance:** UPI transaction value grew at ~65% CAGR from ₹21 trillion in FY2020 to ₹257 trillion in FY2025, with 80% of this growth coming from Tier-2+ cities, reflecting growing trust in digital systems and increasing convenience-led adoption.
- Expanding participation in financial markets:** Demat penetration reached 11-13% of adults, NSE retail investor count touched 40 million, and retail loan disbursements hit ~₹78 trillion in FY2025 (~25% CAGR from FY2020), indicating broader engagement across equity, credit, and investment products.
- Adoption of long-term financial instruments:** Pension schemes such as the National Pension Scheme ("NPS") with 1.2 million new private subscribers in FY2025 and Atal Pension Yojana ("APY") with ~76 million subscribers are helping instil savings and protection habits among low-income and informal sector workers.
- Policy and infrastructure support:** Initiatives like Prime Minister Wi-Fi Access Network Interface ("PM-WANI"), India Stack, e-KYC, Skill India, and Financial Literacy Centres are bridging access gaps in underserved regions. Concurrently, regulatory interventions by IRDAI, SEBI, and RBI are enhancing trust, improving ease of onboarding, and driving adoption.

Together, these developments are deepening India's financialization base, creating a large, cost-effective pool of insurable customers. As awareness, access, and digital infrastructure expand, insurers are better placed to scale protection offerings in underserved markets.

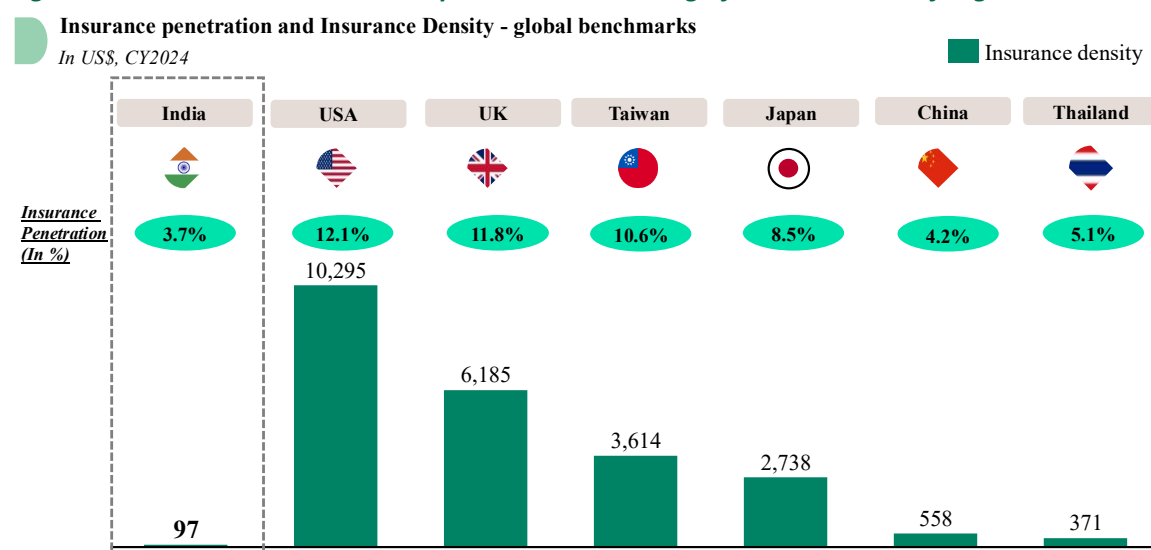
Chapter 2: India's underpenetrated insurance sector is set for strong growth across life and non-life segments, driven by beyond top 30 markets by population (B30+) markets

Motor and health insurance are among the fastest-growing segments in India's non-life insurance market, driven by regulatory mandates, rising healthcare costs, and digital adoption. Motor insurance is expanding rapidly driven by increasing vehicle ownership, regulatory compliance, and growing adoption of digital insurance platforms. Health insurance is witnessing substantial growth as rising medical inflation, changing disease patterns, and increased awareness post COVID fuel demand. The life insurance market in India is evolving, driven by rising financial awareness, growing adoption of digital-first distribution models and supportive regulatory interventions.

2.1. India's insurance market remains robust with a strong growth potential

India's insurance penetration remains well below that of developed economies, with Gross Written Premium ("GWP") as a percentage of GDP standing only ~3.7% as of CY2024. With life insurance at ~2.7% and non-life at ~1.0%, compared to the global average of ~3.0% for life and ~4.3% for non-life, according to Swiss Re Institute Sigma No 2/2025 World Insurance report. Mature markets such as the United States and the United Kingdom reported significantly higher penetration levels of ~12.1% and ~11.8%, respectively in CY2024, signalling room for growth. India's insurance penetration is projected to exceed 4% by FY2030P, driven by increasing awareness and growing adoption of insurance products.

Figure 7: Insurance in India is underpenetrated with a significant headroom for growth



Source(s): Swiss Re Institute Sigma No 2/2025, IRDAI, Redseer research and analysis

Insurance density in India, measured as Gross Direct Premium Income ("GDPI") per capita, stood at ~US\$97 (~₹8,245) in CY2024, up from ~US\$74 (~₹6,290) in CY2018. This is projected to rise to US\$148-156 (₹12,580-13,260) by CY 2030. In comparison, mature economies such as the US and the UK reported significantly higher insurance densities of ~US\$10,295 (~₹8,75,075) and ~US\$6,185 (~₹5,25,725), respectively, in CY2024. China, another major emerging economy with a comparable population, had an insurance density which is substantially higher at around ~US\$558 (~₹47,430) in the same year, indicating a significant headroom for growth for India. Additionally, with large protection gaps and growing retirement income needs, there is opportunity for life insurers to develop new life products that proactively anticipate consumers' needs, and solutions that can be distributed through digital channels, as per Swiss Re. According to Swiss Re, India accounts for one of the largest

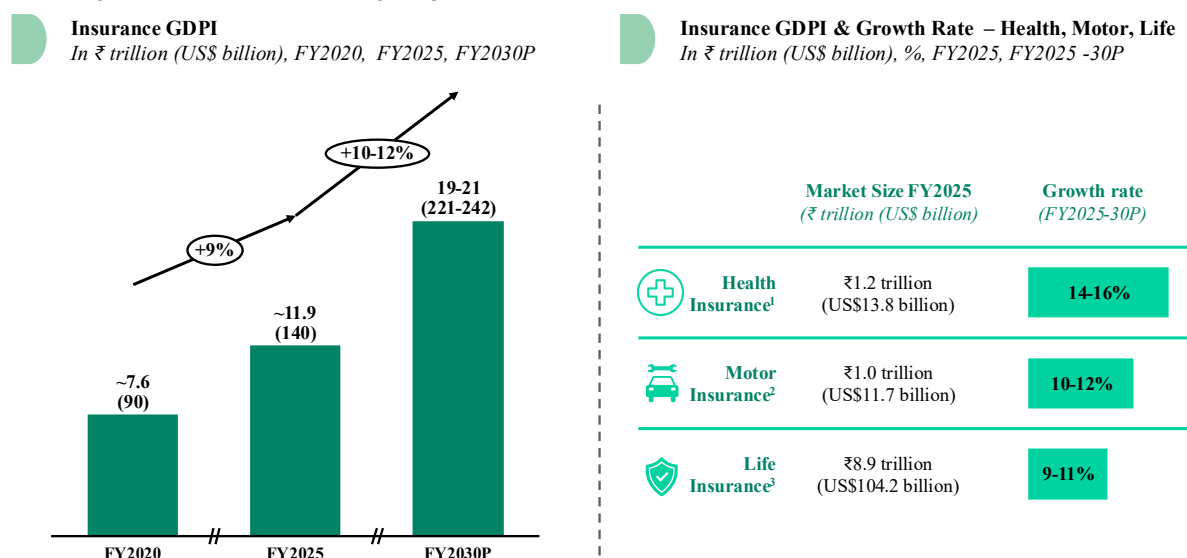
life insurance protection gaps globally, estimated at approximately US\$45 billion in 2022, representing over 10% of the total global protection gap.

India continues to have a growing segment of middle-income households which remain vastly underpenetrated, especially in retail health insurance. With health insurance penetrations >50% for households of income less than ₹0.15 million per annum (owing to government schemes) and more than ₹0.5 million per annum, the middle-income households create a “missing-middle” for the Indian insurance industry with a meagre 20-30% penetration as of FY2025. Historically, low insurance penetration in India has been driven by a combination of factors:

1. **Limited awareness:** Consumers are unaware about the full spectrum of insurance benefits, including life-stage planning, health risk coverage, and asset protection. They continue to associate insurance primarily with tax benefits rather than as a strategic tool for long-term financial protection.
2. **Constrained distribution reach:** Traditional distribution channels are concentrated in Metro and tier-1 cities, leading to under-penetration in Beyond the Top 30 markets (“B30+”).
3. **Trust deficit:** Past instances of mis-selling, unclear policy terms, and delays in claims settlement have led to scepticism and cautious behaviour toward insurers.
4. **Product complexity:** Insurance offerings often contain technical jargon and complex terms, which can be difficult to interpret for first-time buyers.

India’s total GDPI, the aggregate of all premiums collected by insurance companies, is ~₹11.9 trillion (US\$140 billion) in FY2025. Life, health, and motor insurance account form the largest segments accounting for ~92% of all GDPI collected in FY2025. Other major segments include personal accident, travel, fire, crop, and marine insurance. Health insurance has been the fastest-growing segment between FY2020 and FY2025, with a CAGR of ~18%, driven by rising awareness and demand, following the Covid-19 pandemic. It also expected to remain the fastest growing segment between FY2025 and FY2030 growing at a CAGR of 14-16%, followed by Motor insurance, which is expected to grow at 10-12% CAGR during the same period. Looking ahead, insurance GDPI is projected to reach ₹19-21 trillion (US\$221-242 billion) by FY2030, driven primarily by growth in health and motor insurance, with digital distribution and bundled products further boosting accessibility and adoption across diverse consumer segments.

Figure 8: Led by health and motor, India’s insurance market is expected to expand rapidly at a CAGR of 10-12% over the next five years



Note(s): (1) Health Insurance excludes Travel and Personal Accident, (2) Motor Insurance includes Own Damage and Third-party, (3) Life insurance includes both new and renewal premiums, (4) P – Projected, (5) Conversion rate of US\$ 1 = ₹85 used

Source(s): IRDAI “Handbook on Indian Insurance Statistics 2023-24”, GIC, Redseer research and analysis

The IRDAI envisions achieving ‘**Insurance for All**’ by **2047**, aiming to ensure that every Indian citizen has access to suitable life, health, and property insurance coverage, and that all enterprises can avail themselves of appropriate insurance solutions. Achieving this will require the insurance sector in India to grow at a significantly faster pace than the projected growth rate mentioned above. In pursuit of this goal, IRDAI is actively introducing measures to boost penetration, including promoting microinsurance for low-income segments, integrating with government schemes like PMJAY, and advancing financial inclusion through program-linked coverage. It is also driving standardization and technology adoption to expand access, particularly in underserved rural areas. With 75 insurers² operating in India as on 31st March 2025, IRDAI is also actively expanding the insurance landscape by increasing the number of licensed entities across life, non-life, standalone health, and reinsurance segments.

Some of the specific initiatives to drive insurance penetration by IRDAI and the Government of India are as follows:

- **Bima Sugam & Bima Trinity:** Bima Sugam is a proposed digital public infrastructure platform integrating services such as policy purchase, claims, agent transitions, and grievance redressal. It is part of the Bima Trinity, which also includes Bima Vahak (a women-led rural distribution force) and Bima Vistaar (a bundled life, health, and property insurance product). The initiative aims to digitize and simplify the insurance lifecycle while expanding reach in underserved rural markets through bundled products and grassroots distribution models.
- **Open Architecture:** Banks and other enterprises are required to provide an open architecture, enabling customers to select their preferred insurance products from a range of options, in accordance with applicable Indian regulatory requirements. Banks and Corporate Agents can now partner with up to 9 life insurers, 9 non-life insurers, and 9 standalone health insurers. This expands customer choice, encourages competition, and supports insurance penetration by offering more flexibility in product distribution.
- **100% FDI in Insurance Companies and Intermediaries:** The FDI cap has been increased to 100% for both insurance companies and intermediaries (e.g., brokers, TPAs, surveyors), removing previous ownership and control restrictions. The move is expected to boost capital inflows, drive global best practices, and expand distribution and servicing capacity, especially for digital-first and tech-enabled players.
- **EOM Regulations:** Effective FY2024, IRDAI revised the erstwhile Payment of Commission Regulation from the Payment of Commission or Remuneration or Reward to Insurance Agents and Insurance Intermediaries, 2016 to Insurance Regulatory and Development Authority of India (Payment of Commission) Regulations, 2023. The new regulations, while removing the commission caps, put in place overall limits on Expense of Management (“EOM”) of the GI, health and Life insurers. These EOM caps were at 30% of GWP for GI, 35% of GWP for standalone health insurers (SAHIs). The revised regulations provide insurers with significantly greater flexibility in expense allocation and have materially altered how they manage their cost structures. Notably, the definition of “commission” has also been expanded to include any form of compensation - whether termed remuneration, reward, or otherwise - paid by an insurer to an insurance agent or intermediary for soliciting, procuring, or transacting insurance business. According to the IRDAI Annual Report for FY2024, this shift has led to a ~97% increase in commission payouts by general insurers – from ₹201.4 billion in FY2023 to ₹396.0

² Includes insurers and re-insurers

billion in FY2024. This also resulted in insurers scaling back their spends on marketing spends. Insurers have scaled back their operating expenses, which declined by ~30% during the same period. This redistribution of expenses has enabled insurers to reward outcome-linked distribution efforts more effectively. In particular, insurtech intermediaries that play a significant role in market development, such as improving access in underpenetrated regions, supporting Point of Sales Persons (“POSs”), and driving digital adoption, have become key beneficiaries. As a consequence of such a change, the extent of marketing services that insurtech firms could provide to the insurance companies also underwent material changes. These players are now able to command higher payouts from insurers in recognition of their role in expanding the insurance footprint and enhancing last-mile service delivery.

- **The Insurance Amendment Act:** A major reform was announced in the Union Budget 2025, with the government increasing the FDI cap in insurance from 74% to 100%. Additionally, the Sabka Bima Sabki Raksha (Amendment of Insurance Laws) Act, 2025 has received the President’s assent after being passed by both Houses of Parliament during the Winter Session 2025. To implement the higher FDI limit and related reforms, amendments will be made to the Insurance Act, IRDAI Act, NDI Rules, India’s FDI Policy, and various IRDAI regulations.

The Act introduces one-time, perpetual registration for insurance intermediaries, with intermediaries now required to pay annual fees to the IRDAI. Share transfer norms have been eased, with prior IRDAI approval now required only for transfers or issuances exceeding 5% of an insurer’s paid-up share capital (versus 1% earlier).

Other salient features include recognition of online modes of premium payment under Section 64VB, introduction of Managing General Agents (“MGAs”) as a new category of insurance intermediaries, and expanded IRDAI oversight. Insurance intermediaries are now explicitly subject to IRDAI’s investigative and directive powers, penalties for contraventions have been increased from INR 10 million to INR 100 million, and IRDAI has been granted explicit authority to regulate or cap commissions. The MGA framework, thus enables a structure for deeper participation across the insurance value chain, potentially including product design and pricing, underwriting, distribution, and servicing, subject to regulatory oversight.

In addition, the Sabka Bima Sabki Raksha (Amendment of Insurance Laws) Act, 2025 also authorizes the Central Government, in consultation with IRDAI, to notify ancillary and value-added services that insurers may undertake.

Collectively, these changes are expected to improve capital availability, ease entry and scaling for intermediaries and reinsurers, and strengthen regulatory oversight across the insurance value chain, while also supporting greater digitisation, product innovation, and long-term growth of insurance penetration in India.

- **National Health Claims Exchange (NHCX):** NHCX aims to standardize and digitize health insurance claims processing across insurers, hospitals, and TPAs. By enabling real-time data exchange, e-KYC integration, and interoperable claim formats, NHCX enhances transparency, reduces turnaround time, and improves efficiency across the health insurance value chain, especially under government and retail schemes.
- **Exemption of GST on insurance premiums:** The GST Council’s decision, effective September 2025, to exempt individual life and health insurance premiums from the earlier 18% Goods and Services Tax represents a significant structural shift for the sector. By removing the tax burden on term, health, ULIP, and traditional life insurance products, the reform directly reduces the effective cost of coverage for consumers. This intervention is expected to materially improve affordability, one of the key barriers to insurance penetration in India. As a result, it is anticipated to drive a meaningful uplift in first-time policy purchases, higher renewals, and improved adoption across mass and emerging-middle segments. The GST exemption therefore not only aligns with broader financial inclusion objectives but is also likely to support stronger, more sustainable growth in India’s retail insurance market.

The said amendment has an impact on the availment of GST input tax credit for an insurer resulting in additional cost of doing business. To compensate the losses of benefit of input tax credit, insurers have and may continue to proportionately reduce the commission payouts for life and health insurance products to the insurance brokers/corporate agents.

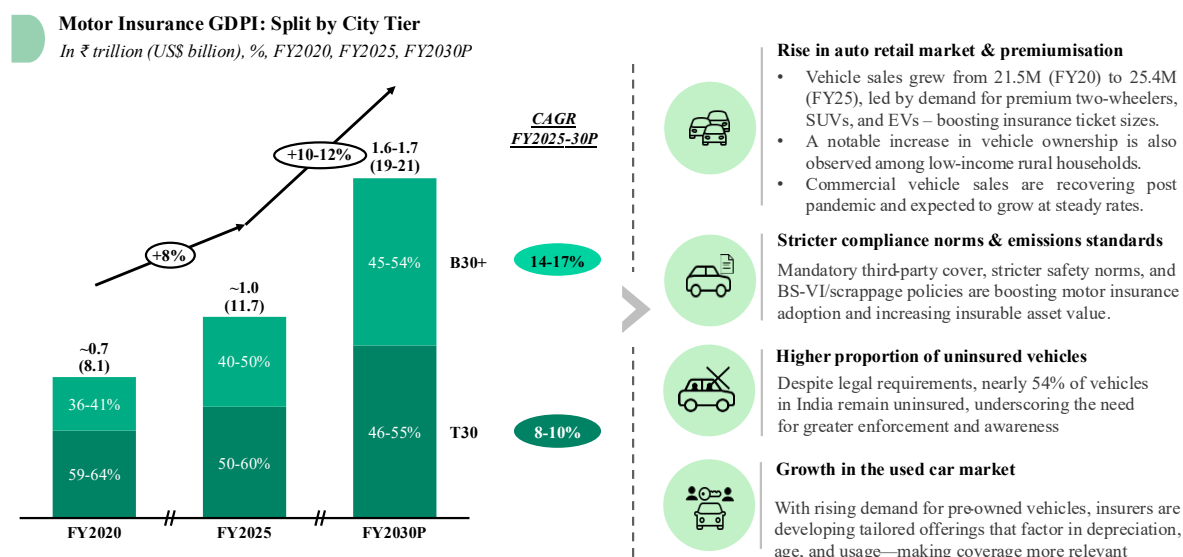
Looking ahead, several upcoming reforms are set to further advance IRDAI's 'Insurance for All' vision, drive innovation and propel the growth of insurance in India.

2.2. Motor insurance in India is a ~₹1.0 trillion (US\$11.7 billion) opportunity in FY2025, estimated to grow at 10-12% to ₹1.6-1.7 (US\$19-21 billion) by FY2030

Motor insurance policies in India are issued to cover third-party liability, own-damage risks, or as bundled products that combine both coverages. The motor insurance GDPI in India grew from ~₹0.7 trillion (US\$8.1 billion) in FY2020 to ~₹1.0 trillion (US\$11.7 billion) in FY2025, at a CAGR of ~8%. It is further expected to accelerate at 10-12% CAGR over the next five years to ₹1.6-1.7 trillion (US\$19-21 billion) by FY2030. Increasing consumer demand for motor vehicles is a key driver of the expanding motor insurance market.

An important factor in the sector's future growth is the rising contribution of markets Beyond the Top 30 ("B30+"). These regions are gradually playing a more significant role in the motor insurance market. Greater awareness of insurance, helped by digital platforms and government efforts, is making it easier for consumers in these areas to access and understand motor insurance products. By FY2030, B30+ markets are expected to contribute 45-54% of the total gross direct premium income from motor insurance, supported by a CAGR of 14-17%, growing 1.5-1.7x faster than Top 30 ("T30") markets by population.

Figure 9: Motor Insurance GDPI is set to increase enabled by multiple structural drivers



Note(s): (1) Motor Insurance GDPI includes Own Damage and Third-party GDPI, (2) P – Projected, (3) Conversion rate of US\$ 1 = ₹85 used (4) T30 refers to Top 30 markets by population and B30+ refers to rest of India.

Source(s): IRDAI "Handbook on Indian Insurance Statistics 2022-23", General Insurance Council (GIC) Segment wise report, Redseer research and analysis.

2.3. Health insurance in India is a ~₹1.2 trillion (US\$13.8 billion) opportunity in FY2025, estimated to grow at 14-16% CAGR to ₹2.3-2.5 trillion (US\$27-29 billion) by FY2030

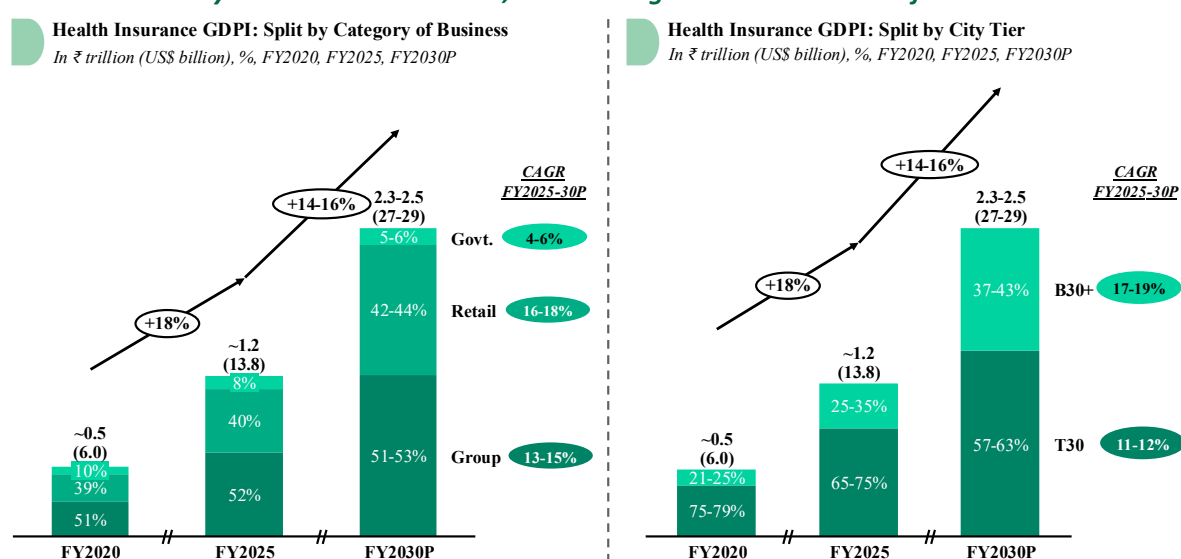
Health insurance has emerged as one of the fastest-growing segments in India's insurance sector, expanding from ~₹0.5 trillion (US\$6.0 billion) in FY2020 to ~₹1.2 trillion (US\$13.8 billion) in FY2025 at a CAGR of ~18%. By FY2022, it surpassed motor insurance to become the largest non-life segment. Looking ahead, the segment is expected to grow at a CAGR of 14-16%, reaching ₹2.3-2.5 trillion (US\$27-29 billion) by FY2030, supported by continued product innovation to cater to India's diverse demographic and economic landscape.

As of FY2025, retail health insurance, comprising policies purchased directly by individuals or families, contributes ~40% to health insurance and is expected to be the fastest-growing segment through FY2030, contributing 42-44% to overall health insurance. These policies typically command higher average premiums due to broader coverage and optional add-ons, and they exhibit strong renewal rates. This may lead to more predictable cash flows and enhances portfolio profitability, positioning retail health as a strategic growth driver for insurers.

Some of the key structural factors contributing to the rise of retail health in India are as follows:

- **Healthcare inflation and out of pocket expenses:** ~46% of India's Current Health Expenditure ("CHE") was driven by out-of-pocket expense, exacerbated by the rising healthcare inflation in the country at ~4.05%, making treatment unaffordable for many without insurance.
- **Impact of the COVID-19 pandemic:** The pandemic served as a structural inflection point for health insurance awareness. The unprecedented scale of hospitalization, coupled with financial strain, led to a surge in first-time policy adoption and demand for family floater and top-up plans. In its aftermath, there has been a sustained shift in consumer behaviour, with growing awareness not only of acute medical emergencies but also of chronic and lifestyle-related diseases such as diabetes, hypertension, and cardiac conditions- further reinforcing the perceived value of health insurance as a financial safety net.
- **Ageing population and demographic shift:** The population aged 65+ in India is projected to grow from ~90 million in 2019 to ~130 million by 2030, increasing demand for elderly-focused insurance products.

Figure 10: Retail health insurance is projected to be the fastest-growing segment in the health insurance industry between FY2025-2030, with the highest demand driven from B30+ markets



Note(s): (1) Health Insurance excludes Travel and Personal Accident, (2)P – Projected, (3) Conversion rate of US\$ 1 = ₹85 used (4) T30 refers to Top 30 cities by population and B30+ refers to rest of India.

Source(s): IRDAI "Handbook on Indian Insurance Statistics 2022-23", General Insurance Council (GIC) Segment wise report, Redseer research and analysis

Driven by rising healthcare awareness B30+ markets are expected to contribute 37-43% of health insurance GDPI by FY2030, expanding at a robust CAGR of 17-19%, ~1.6x more than in T30 markets.

1. **Rising healthcare expenditure:** Household spending on healthcare has grown steadily, driven by increased incidence of chronic diseases, greater awareness and adoption of healthy lifestyle, and rising costs of diagnostics and hospitalization.
2. **Government- led interventions and schemes:** Programs such as Ayushman Bharat (“PM-JAY”) have brought health insurance into national discourse, while state-level schemes are expanding coverage for low-income segments. Additionally, IRDAI’s regulatory push for standardization and portability is fostering trust and transparency, collectively driving greater awareness, trust, and uptake of health insurance among first-time and underserved consumers.
3. **Improved access to healthcare infrastructure:** Rising investments in hospitals, diagnostics chains, and telemedicine, especially in B30+ markets, have improved healthcare availability and created a more favourable ecosystem for insurance utilization.
4. **New and Specialised Insurers:** The market has seen the entry of standalone health insurers and digital-first players focused on niche segments. These specialised models are enhancing product relevance, improving claims experience, and driving innovation tailored to evolving healthcare needs.

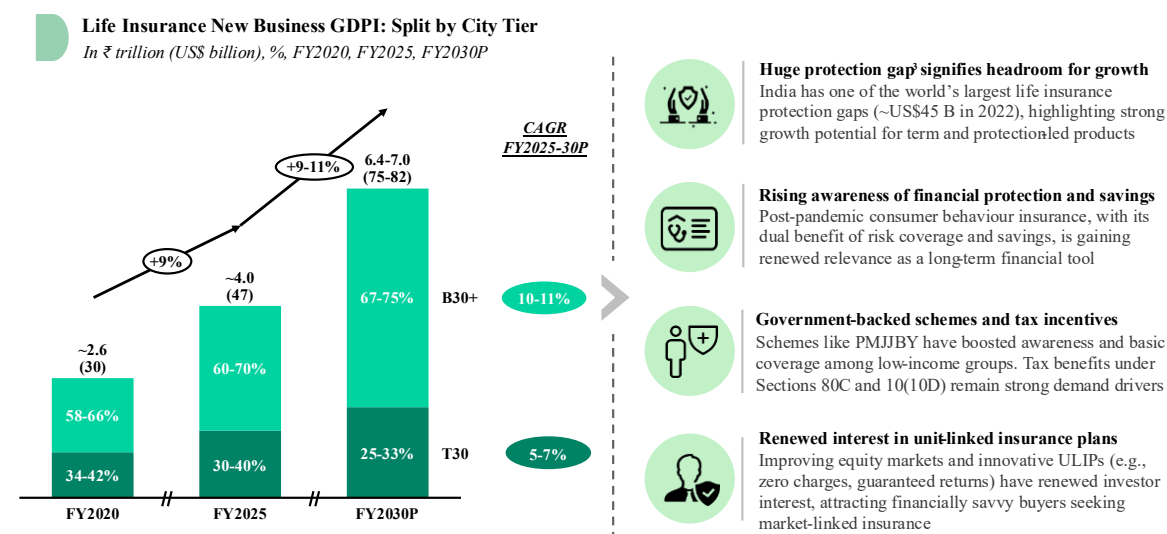
2.4. Life insurance forms the largest segment in India’s insurance landscape at ~₹8.9 trillion (US\$104.2 billion) in FY2025 with new business contributing ~45% to this

Life insurance accounts for ~74% of India’s overall insurance market, having grown at a CAGR of ~9% from ~₹5.7 trillion (US\$67.4 billion) in FY2020 to ~₹8.9 trillion (US\$104.2 billion) in FY2025, with new business contributing ~₹4.0 trillion (US\$47.7 billion). Life insurance new business is expected to grow at a CAGR of 9-11% to ₹6.4-7.0 trillion (US\$75-82 billion) by FY2030.

As penetration deepens and distribution channels continue to evolve, life insurance is expected to play a pivotal role in advancing financial inclusion, enhancing household financial security, and supporting capital formation. The life insurance business in India is predominantly driven by agent and direct insurer channels. Unlike motor or health insurance, where demand is more customer-initiated, life insurance typically requires a push-based approach. As a result, ~76% of life insurance new business GDPI in FY2025 was generated through these channels.

B30+ markets, with a fragmented and diverse customer base, are expected to contribute 67-75% of total new business GDPI, supported by a CAGR of 10–11% by FY2030, 1.5-2x that of T30 markets. Several factors are driving this growth: the rise of digital-first distribution models, improved mobile and internet access, increasing awareness around the importance of financial protection and long-term savings, and government-backed schemes.

Figure 11: Life insurance new business GDPI is set to increase, driven by growth in B30+ markets and enabled by multiple structural drivers



Note(s): (1) P – Projected, (2) Conversion rate of US\$ 1 = ₹85 used (3) T30 refers to Top 30 markets by population and B30+ refers to rest of India

Source(s): IRDAI "Handbook on Indian Insurance Statistics 2022-23", Segment wise report, Redseer research and analysis

B30+ markets are expected to contribute significantly to insurance growth, accounting for 45–54% of total GDPI from motor insurance with a CAGR of 14–17%, 37–43% of health insurance GDPI with a CAGR of 17–19% and 67–75% of total life new business GDPI with a CAGR of 10–11% between FY2025 and FY2030. Overall, premiums from B30+ markets across motor, health, and life new business segments are projected to grow at a CAGR of 12–15% between FY2025 and FY2030, approximately 1.3 to 2 times the growth rate of premiums from T30 markets.

This growth is further shaped by the distinct seasonal purchasing patterns observed across insurance segments in India. Non-life insurance, particularly among corporates, sees concentrated activity at the start of the financial year, driving a spike in premium inflows during April. In contrast, life and health insurance products experience stronger demand in the fourth quarter, driven by individuals aiming to leverage income tax benefits, resulting in elevated premium collections during that period.

India's insurance sector is set for strong growth across life, health, and motor segments, supported by favourable macroeconomic conditions and a progressive regulatory environment. Alongside this, ongoing product and distribution innovation is broadening access and deepening penetration across a wider population base.

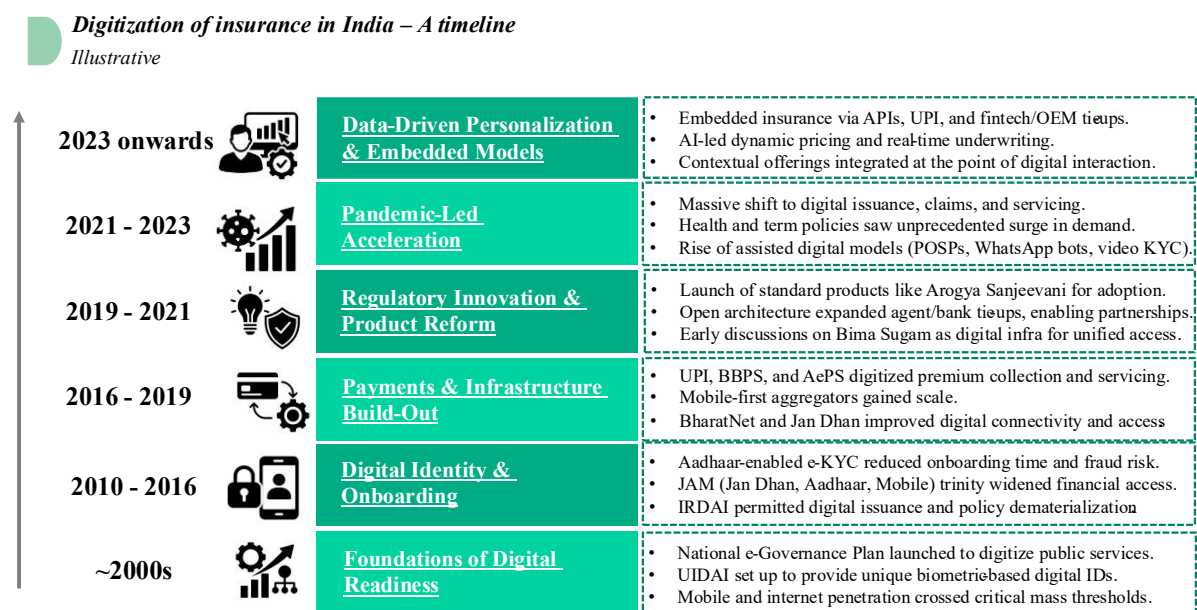
Thus, as of FY2025, 50-60% of the GDPI for Motor, Health and Life New Business is expected from B30+ markets. B30+ markets are projected to experience insurance demand growth rates up to 1.6 times higher than T30 between FY2025 and FY2030 for motor, health and life new business insurance.

2.5. Emerging trends and technological advancement underscore substantial growth potential for insurance in India

India's insurance sector is undergoing a major transformation, driven by digital innovation, broader distribution channels, and strategic partnerships across industries. These changes are helping insurers reach new customer segments, improve conversions, and fundamentally reshape how insurance products are marketed, sold, and serviced.

India's insurance sector has undergone a significant digital transformation, steadily evolving from foundational IT systems with limited services in the early 2000s to fully integrated digital ecosystems today with the help of government backed initiatives such as Aadhaar-based e-KYC, e-signatures, and UPI-powered payments increasing accessibility. These digital tools have not only simplified customer onboarding but have also made policy issuance almost entirely paperless – greatly improving accessibility and streamlining both acquisition and servicing processes across the insurance value chain.

Figure 12: Insurers are accelerating tech adoption across underwriting and processing to enhance speed, accuracy, and customer experience, making insurance more accessible and efficient



Source(s): Redseer research

Key technology trends in the insurance landscape are as follows:

- Digital disruption and technology-driven growth:** Insurers are modernizing their core systems to improve efficiency, accuracy, and adaptability to growing scale. Some of these advancements include:
 - Automated underwriting, real-time processing, and AI-led workflows streamlining policy issuance, claims handling, and fraud detection.
 - Cloud-native infrastructure enabling faster product deployment, reducing IT costs, and ensuring seamless third-party integration across the insurance value chain.
- Expanding insurance access to underserved markets through digital distribution:** Technology is transforming how insurance is distributed, expanding reach into underpenetrated markets while lowering distribution costs. Some of the key enablers are:
 - Aggregator platforms, tech-enabled brokers, and Point of Sales Person (“POSP”) led models driving convenience with instant quotes, paperless onboarding, and app-based servicing
 - Self-service portals and conversational AI tools empowering customers to manage policies and claims independently, improving satisfaction and reducing servicing costs.
- Cross sector collaborations for driving growth:** Insurers are increasingly embedding offerings into adjacent digital ecosystems to deliver frictionless, relevant coverage. This includes:
 - Embedded insurance models via fintech and health-tech platforms, auto OEMs, and e-commerce platforms enabling frictionless distribution with contextual relevance.

- ii) Big tech and digital platforms leveraging user data, scale, and engagement ecosystems to seamlessly integrate and distribute insurance products.

Together, these technology shifts are reshaping the insurance landscape, enabling greater personalization, wider product choice, and improved access for customers across segments.

Chapter 3: India's insurance distribution landscape: Assisted selling is critical to ensuring "Insurance for All" By 2047

India's insurance distribution landscape is rapidly evolving, driven by proactive regulatory reforms and the accelerated digital adoption. The total addressable market ("TAM") for digital retail insurance distribution is expected to grow from ₹3.1 trillion (US\$36.7 billion) in FY2025 to ₹5.3-5.8 trillion (US\$62-68 billion) by FY2030, with strong traction in motor, health, and retail life segments. Broker-led distribution, enabled by digital platforms and POSP models, is expected to drive ₹3.1-3.3 trillion (US\$36-39 billion) by FY2030, offering wider customer choice, deeper engagement, and efficient reach into B30+ and underserved markets. The remaining market offers strong headroom for digital expansion, especially through bancassurance via embedded insurance models.

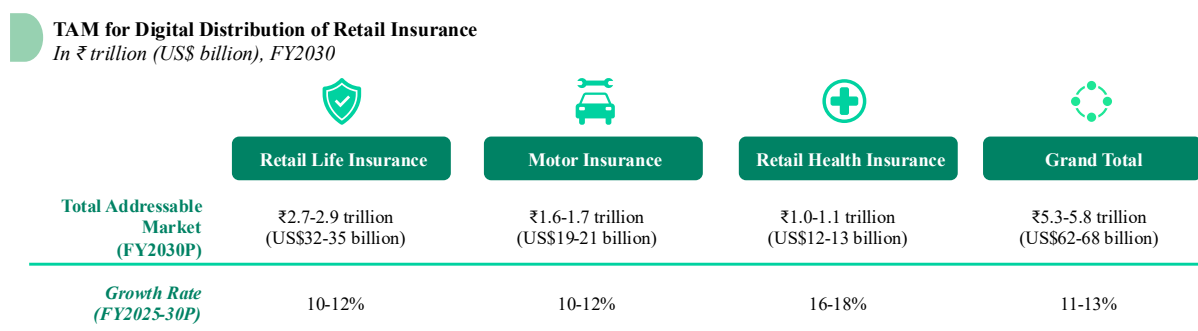
Insurance distribution in India has evolved significantly- from traditional agent networks and bancassurance (Corporate Agents – Banks and Others) to digital brokers and now, tech-enabled assisted models, all of which are predominantly led by intermediaries assisting customers. The POSP model represents a pivotal step in this evolution, combining local trust with digital infrastructure to servicing to customers.

3.1. TAM for digital insurance distribution in India

India's insurance distribution remains largely driven by non-insurer-led channels, comprising intermediaries, which contribute over 90% of GDP across motor, health, and life insurance segments. Even within insurer-led channels, the majority of premiums are still driven by offline, assisted processes. In total, assisted distribution accounts for over 95% of all insurance sales in India, highlighting the industry's continued reliance on human-led engagement coupled with digital advancements. Insurer-led direct channels continue to depend heavily on manual processes, highlighting significant scope for digitisation to improve efficiency and user experience. This trend is consistent globally as well with non-insurer-led channels contributing to more than 70% of premiums in the US and over 90% in China as of CY2024. The total addressable market ("TAM") for digital distribution of retail insurance in India, primarily across motor, retail health, and retail life insurance (new business), is estimated at ~₹3.1 trillion (US\$36.7 billion) in FY2025 and is projected to grow at 11-13% CAGR, reaching ₹5.3-5.8 trillion (US\$62-68 billion) by FY2030. This market opportunity for online insurance distribution platforms consists of the following two opportunities:

- (i) Broker-led distribution, enabled by digital platforms and POSP models, is expected to drive ₹3.1-3.3 (US\$36-39 billion) trillion by FY2030.
- (ii) The remaining market represents a significant opportunity for broader digital enablement, particularly through the bancassurance channel, which is expected to scale by leveraging technology to embed insurance products alongside loan offerings.

Figure 13: The TAM for digital distribution of retail insurance is projected to reach ₹5.3-5.8 trillion (US\$62-68 billion) by FY2030



*Note(s): (1) Retail life insurance excludes unit linked products, single premiums, (2) P – Projected, (3) Conversion rate of US\$ 1 = ₹85 used
Source(s): Redseer research and analysis*

The growth is driven by a combination of distributor, insurer, and consumer-related factors. The digital insurance advisory and distribution space in India is part of a rapidly evolving and dynamic ecosystem, fuelled by the emergence of new business models and technologies. Traditional insurance providers and financial institutions are increasingly entering the insurtech space to tap into the growing opportunities presented by online platforms and their strong digital outreach capabilities.

As consumers increasingly seek guidance in selecting insurance products, the digital insurance distribution model is well positioned to address this need by improving access, particularly in B30+ markets. These underlying drivers are detailed below.

3.2. Customers seek subject matter experts / specialists' guidance in their insurance purchase journey, particularly in B30+ markets

India's insurance sector is poised for long-term, high-growth momentum, but continues to grapple with low penetration across the three largest segments – life, health, and motor. This challenge is rooted primarily in limited uptake driven by the lack of awareness. Insurance products are inherently complex and hence customers often seek guidance throughout their insurance journey, not just at the time of purchase, but also during post-sale servicing and claims. Some of the key challenges faced by customers is as follows:

1. **High dependency during claims:** The claims experience is a critical touchpoint in a customer's insurance journey. Insurance claims, especially in motor and health, require documentation and coordination with third parties, making intermediaries essential for smooth processing. With ~1 million life insurance claims and 5.6 million non-life claims recorded in FY2024, the scale highlights the critical need for effective support during the claims process. This often defines future purchase decisions, underscoring the importance of having a trusted party for seamless claims support.
2. **Low awareness of policy details:** Insurance products are complex, and financial literacy levels remain low across large segments of the population. As a result, customers often do not fully understand their coverage, exclusions, or claims procedures. Intermediaries, especially brokers and POSPs, typically help customers choose products better suited for them, especially in life insurance where many agents remain concentrated among the top insurers.
3. **Infrequent, high-cost purchases amid a vast array of complex products:** Insurance is typically an infrequent and high-value purchase, prompting customers to invest significant time and effort in evaluating options to ensure adequate protection and value. With 1,262 life insurance products, and 2,055 general and health insurance products spread across 62 life and general insurers, choosing the right product can be overwhelming. Product complexity is also driven up by a range of variables such as optional riders, policy tenure, premium payment structures, sum assured levels, exclusions, waiting periods, and co-payments. This highlights the need for support and guidance in selecting the right products and plans.
4. **Convenience and trust in human touchpoints:** Intermediaries such as agents and POSPs play a critical role in building trust and ensuring accessibility in the insurance journey, particularly in semi-urban and rural areas. Their familiarity and local presence offer reassurance during stressful events like claims, where personal support is often valued over digital-only channels. They also act as key facilitators in resolving service grievances, bridging communication between insurers and policyholders. Moreover, they help overcome language and digital literacy barriers, making insurance more approachable and inclusive for underserved segments.

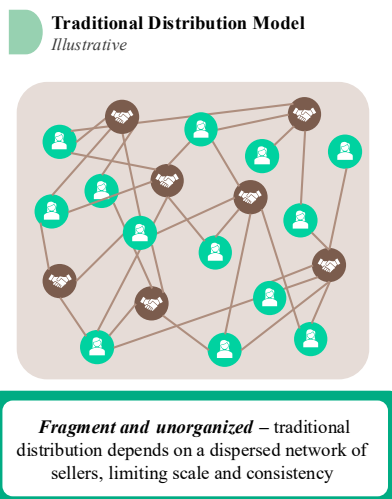
Owing to these complexities, intermediary models are popular and play varying roles in influencing customer experience and product access:

I. Individual Agents and Corporate Agents: Individual agents play a significant role in the distribution of life and health insurance. These agents are often familiar and trusted figures within their communities, providing accessible, ongoing support, particularly during complex processes such as claims. A large proportion of these agents are associated with the top four life insurers, contributing to a concentration in market share. Corporate agents, typically banks and large institutions, also remain relevant touchpoints, given their existing relationships and frequent interactions with customers across financial services. Their extensive physical branch presence across markets serves as a critical customer origination and engagement touchpoint.

II. Brokers: Insurance brokers operate independently, offering access to a wide range of products across multiple insurers under open architecture. Brokers represent the customer's interest, supporting in personalised solutions through product comparison and choice, particularly relevant in complex categories such as health and commercial insurance.

To expand reach and simplify offerings, brokers increasingly engage certified POSPs – individuals permitted to sell products across motor, health, personal accident, and select life insurance. POSPs operating under a broker can offer products from multiple insurers, providing customers with broader choices and more personalized recommendations. They also play a key role in post-sale support, particularly in claims assistance³, renewals and endorsements where the presence of a trusted POSP is highly valued. Digitally enabled brokers further amplify these advantages by enhancing consumer access, providing greater transparency to customers and POSPs, reducing distribution costs for insurers, and enabling efficient scaling of insurance offerings. On the other hand, the traditional setup features fragmented distribution and uncoordinated, agent-led sales.

Figure 14: Fragmented and unorganized traditional distribution depends on a dispersed network of sellers limiting scale and consistency



Source(s): Redseer research

Commission structures in the insurance broking industry are generally established in advance through mutual agreement between brokers and their Insurer Partners, in accordance with regulatory guidelines. Revenue earned from insurance distribution typically includes commissions and rewards for both new policy issuances and renewals, with payouts linked to the GWP recognized by the insurer. As outlined in the IRDAI's Master Circular on Actuarial, Finance and Investment Functions of Insurers dated May 17, 2024, premiums for Long-Term policies, where collections or

³ The approval and settlement of claims are subject to the fulfillment of insurer requirements, verification of coverage, compliance with the terms and conditions of the relevant policy, and satisfaction of all applicable requirements.

the entire policy term spans beyond 12 months, GWP must be recognized annually. Accordingly, GWP for such policies is recognized by the insurers on a '1/n' basis, wherein the total premium is spread evenly across the policy tenure, and commission expenses incurred by the insurers on the sale of such policies are paid only on the recognized GWP for each financial year. As a result, brokers may experience timing-related delays in billing the commission to the insurer partners.

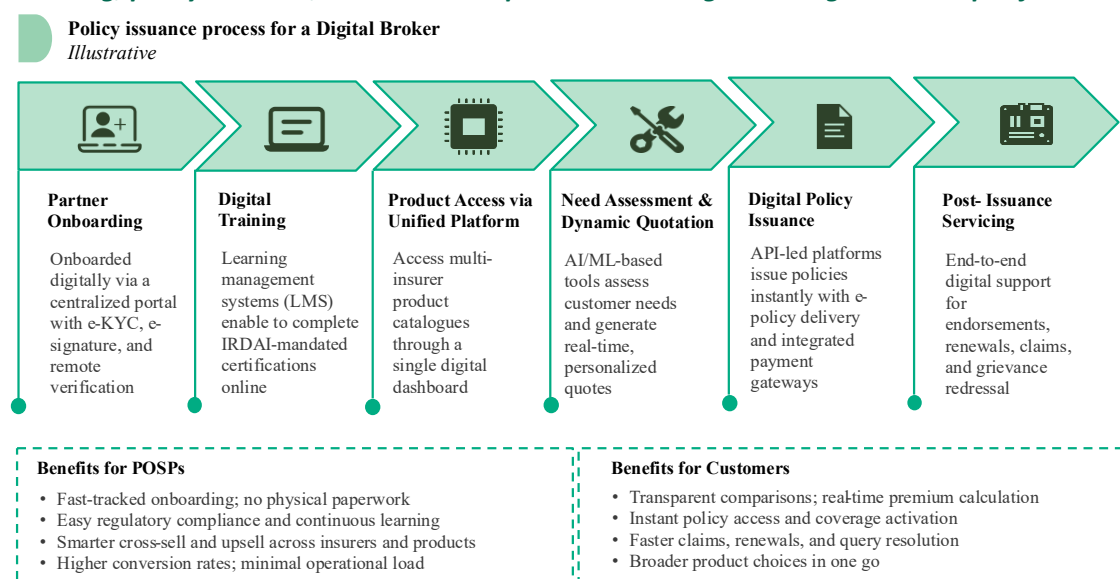
3.3. Scalable tech-enabled digital broker platforms enable instant and low-cost policy issuance for customers in B30+ markets, enhancing both affordability and accessibility, while also unlocking adjacent market opportunities

Technology has become a critical enabler in transforming insurance distribution by bringing down costs, improving turnaround times, and extending access to underserved markets. Digital-first platforms now allow policies to be issued instantly, even in B30+ regions, through tools such as e-KYC, e-signatures, UPI-based premium payments, and API-led integrations with insurers. These platforms also offer embedded features like training modules, real-time quotations, and personalized product recommendations, making the insurance journey seamless for both the POSPs and end customers. With increasing digital literacy in B30+ markets, technology-driven tools will likely augment both awareness and accessibility of insurance products in these regions.

Digital brokers are reshaping insurance distribution by delivering a seamless, API-driven customer journey across the value chain, from product discovery and onboarding to policy issuance and claims servicing. Enabled by integrated digital infrastructure, these platforms streamline operations while enhancing customer experience. Tech-enabled POSPs can act as the last-mile interface, combining localized trust with platform-driven capabilities to expand access, improve retention, and scale distribution efficiently across non-metro markets.

Technology platforms for distribution enable innovative marketplace business models that drive insurance penetration through right set of tech tools and financial incentives. A comparison can be drawn to the discount stockbroking model, which aggregated both demand and supply in a traditionally fragmented broking industry. On the demand side, it attracted a vast number of first-time investors by removing high brokerage fees, offering a flat, transparent pricing model, and providing a seamless, mobile-first trading experience. Simultaneously, the supply was streamlined by integrating directly with stock exchanges and depositories, bypassing legacy intermediaries and reducing operational inefficiencies. This aggregation of demand and supply fuels broader ecosystem growth, a trend expected to play out in insurance distribution as well, driven by the digital broker model.

Figure 15: Digital enablement streamlines onboarding, certification, multi-insurer access, servicing, policy issuance, and real-time quotations through an integrated tech platform



Source(s): Redseer research

Digital-first insurance brokers in India are projected to generate ₹350-400 billion (US\$4.1-4.7 billion) in premiums in FY2025, having grown at a robust CAGR of approximately 40% over the past five years. This growth has been fuelled by rising digital adoption, scalable tech-enabled operating models, and a strong presence in underpenetrated B30+ markets, allowing them to outpace traditional brokers in both reach and efficiency. Looking ahead, with increasing consumer preference for digitised journeys and the emergence of innovative distribution models, digital brokers are expected to sustain their momentum and grow at a CAGR of 25-30% over the next five years. By FY2030, their premium contribution is estimated to reach ₹1,220-1,300 billion (US\$14.5-15.4 billion), representing a dominant share of India's digitally distributed insurance market. Notably, the expansion enabled by digital platforms has led to over 60-70% of digital broker premiums originating from B30+ markets, underscoring their effectiveness in deepening penetration in underserved regions.

By leveraging technology, digital brokers are also enhancing customer engagement through:

- End-to-end digital journeys from policy selection to claims reduce friction for both customers and POSPs, enabling faster, smoother experiences.
- Agent-driven support strengthens customer trust and engagement, leading to higher retention, especially in underpenetrated B30+ markets.
- Access to a broad multi-product portfolio across insurers allows for tech-enabled policy recommendations and improved satisfaction.

By enhancing customer engagement across the value chain, digital brokers are also enabling more cost-efficient distribution. AI-led product matching, e-KYC, and automated issuance reduce manual effort and shorten the sales cycle, while digital servicing lowers overheads. Additionally, insurers are required to adhere to various regulations regarding EOM including robust governance frameworks.

Digital brokers, with their tech-driven, performance-linked model, offer a leaner, cost-effective, and scalable solution for insurers to better manage their expenses and expand reach. This drives conversions and customer retention at lower costs reinforcing digitization as a cornerstone in the

ongoing transformation of the insurance industry, with digital brokers thus delivering about 8-10% cost savings to insurers.

Moreover, the digital ecosystem facilitates POSP operations by providing easy onboarding, training, and real-time policy issuance tools. Technology enhances transparency for POSPs regarding payout details and streamlines the payout process, ensuring timely and reliable payments, which are critical to POSPs.

With the formal notification of the Digital Personal Data Protection Rules in November 2025, India has taken a decisive step toward a more structured, technology-led data governance framework. The phased implementation, until May 2027, sets the foundation for a more transparent and consumer-centric digital ecosystem.

For digital brokers, this regulatory evolution reinforces the role of technology as a trust enabler. As consumers gain greater control over how their data is collected, used, and shared, platforms that invest early in consent management, secure data handling, and rights-based workflows will be better positioned to offer choice with confidence. The requirement to manage explicit consent further accelerates the shift toward robust, auditable, and interoperable tech systems. Over time, this framework is expected to strengthen consumer trust, improve data quality, and support more informed product discovery, reinforcing the value proposition of digital brokers as transparent, tech-enabled intermediaries in the insurance ecosystem.

Scalable technology infrastructure is enabling strategic distribution partnerships, expanding reach and accelerating insurance adoption, particularly through embedded insurance and API-based models

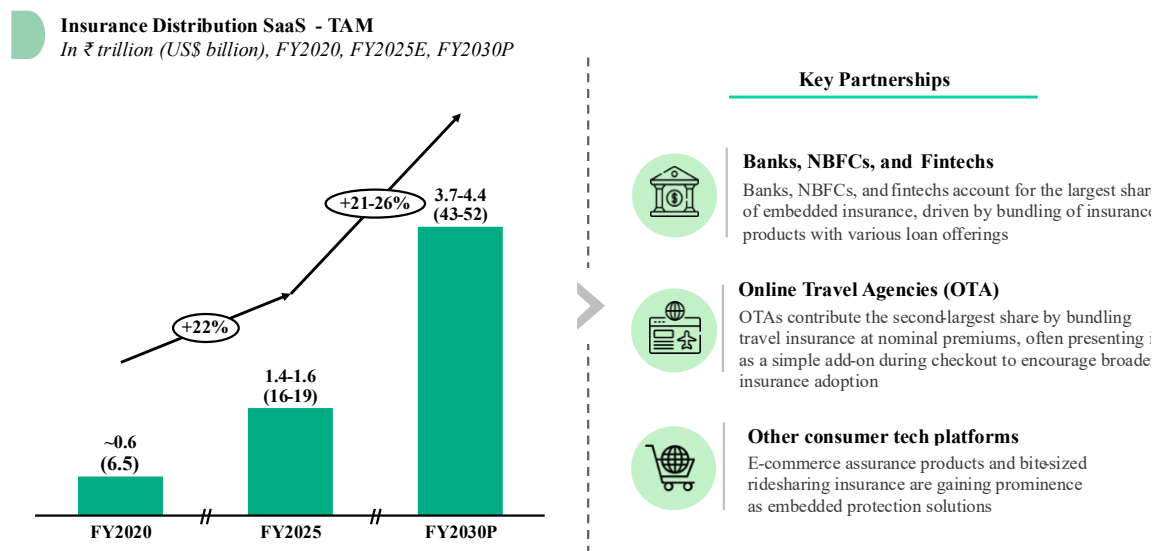
Customizable SaaS solutions are transforming digital insurance distribution by enabling both financial institutions and consumer-facing platforms to integrate and scale insurance offerings within their existing ecosystems. For banks and NBFCs, these platforms support end-to-end digitization of the insurance workflow, starting from partner onboarding and certification to unified product access, AI-driven need assessment, instant policy issuance through API integrations, and post-issuance servicing. This allows bancassurance players to embed insurance products seamlessly into customer journeys, ensuring regulatory compliance, faster turnaround, and operational efficiency.

At the same time, platforms such as e-commerce marketplaces, OTAs, and digital payment providers are leveraging the same infrastructure to offer small-ticket, contextual insurance products, like travel cover, device protection, or loan-linked insurance, at relevant transaction points. These integrations enable real-time premium calculation, instant policy activation, and simplified servicing, creating a frictionless user experience while opening up additional revenue streams. Thus, by aggregating multiple insurance products on a single platform, this customizable SaaS solution addresses the regulatory requirement for enterprises and streamlines the insurance distribution process for enterprise clients, including banks, financial institutions, ecommerce players, and fintech companies.

The insurance distribution SaaS market opportunity has seen strong growth, expanding from an estimated ~₹550 billion (US\$6.5 billion) in FY2020 to ₹1.4-1.6 trillion (US\$16-19 billion) in FY2025. Looking ahead, the TAM is expected to grow further at a CAGR of 21-26%, reaching ₹3.7-4.4 trillion (US\$43-52 billion) by FY2030. This growth will be driven by rising insurance adoption and increasing

attachment rates of insurance products across financial services and consumer technology platforms, unlocking significant headroom for scalable, SaaS-based distribution solutions.

Figure 16: Scalable technology can unlock ₹1.4-1.6 trillion (US\$16-19 billion) opportunity in insurance distribution in FY2025, expected to grow at a CAGR of 21-26% over the next five years



Note(s): (1) P – Projected, (2) Conversion rate of US\$ 1 = ₹85 used

Source(s): Redseer research and analysis

Technology has become imperative to the future of insurance distribution in India. It enables cost-effective, scalable models that streamline every stage of the customer journey. Digital brokers and POSP-led platforms are leveraging this infrastructure to drive deep penetration in B30+ markets. At the same time, embedded and SaaS-based integrations are opening up new, contextual distribution channels such as NBFCs, fintech platforms, and e-commerce platforms. Many of the NBFCs and fintech platforms in particular are adopting the POSP model to drive distribution of products, especially in B30+ markets. As insurers face rising cost pressures and growing demand for accessibility, tech-enabled distribution is emerging as the most efficient and sustainable path to expand reach and deliver affordable insurance at scale.

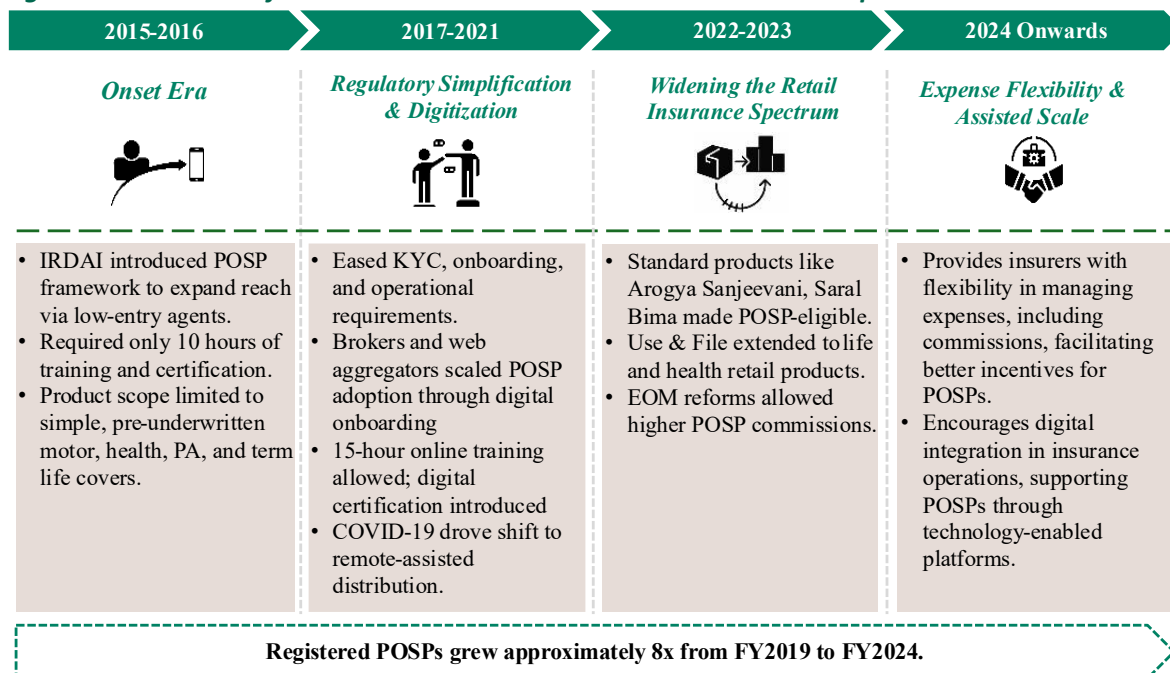
3.4. POSPs, which comprise a multi-brand assisted distribution model are the fastest growing insurance distribution channel

Since its introduction in October 2015, the POSP model has been progressively enabled by targeted regulatory reforms aimed at enhancing access, operational ease, and product availability. A major shift occurred in March 2017 when IRDAI revised the training requirements for POSPs in the non-life and health segments, replacing the NIELIT certification with a simplified in-house 15-hour training and internal examination. This change significantly lowered entry barriers, enabling faster onboarding of POSPs, especially in B30+ markets. Parallely, the product scope under the POSP channel expanded rapidly, with product approvals and participating insurers increasing drastically over the last 5 years.

Further regulatory impetus came from the March 2023 EOM circular, which granted insurers an additional 5% expense allowance for leveraging digital-first distribution strategies and removed the cap on commission expenses if the total EOM limits are adhered to. As a result, non-life insurers are rebalancing their cost structures. Commission expenses grew by 97% year-over-year, rising from ₹201.4 billion (US\$2.3 billion) in FY2022-23 to ₹396.0 billion (US\$4.6 billion) in FY2023-24. As a result, commissions as a share of total expenses (commission + operating) increased from 26.8% in FY2022-

23 to 50.6% in FY2023-24, indicating a fundamental pivot toward distribution-led growth. These reforms have collectively driven the scale-up of POSP-led, tech-enabled assisted distribution, contributing to a steady rise in premium volumes across motor and health insurance segments.

Figure 17: Evolution of the POSP model in the Indian insurance landscape



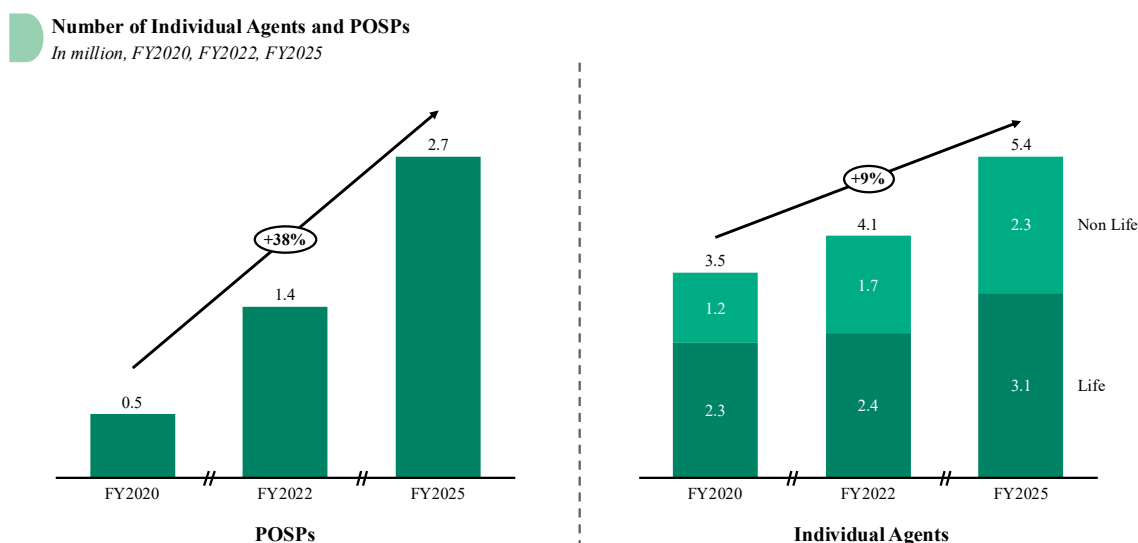
Note(s): (1) POSPs include POSPs sponsored by Insurers, Brokers and Corporate Agents

Source(s): IRDAI, Redseer research

Since inception, the POSP network has scaled to over 2.7 million individuals, exceeding the number of general insurance agents, underscoring its widespread acceptance and operational scalability. Brokers contribute to ~54% of all the POSP base in India at ~1.5 million individuals in India.

While the number of individual agents has grown moderately at ~9% during FY2020-25, POSPs are playing a critical role in last-mile outreach. The POSP model is expanding rapidly, with the number of registered POSPs growing over 5x between FY2020 and FY2025. During FY2020-25, POSPs grew at a ~38% CAGR, significantly outpacing traditional general insurance agents at ~18%. As a result, as of FY2025, POSPs made up nearly 50% of the total insurance agent base and surpassed the number of general (non-life) insurance agents. By FY2030, the number of POSPs is expected to surpass general (non-life) insurance agents count by 1.3-1.5x, highlighting their growing role in driving insurance distribution across the country.

Figure 18: Number of POSPs have grown at a CAGR ~38% between FY2020-25, while the number of individual agents has grown at a ~9% CAGR



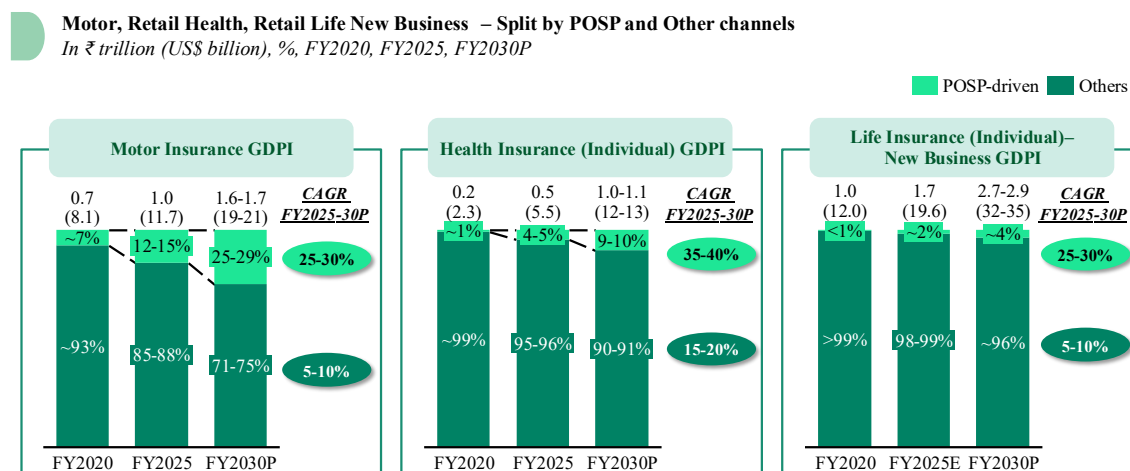
Note(s): (1) POSPs include POSPs sponsored by Insurers, Brokers and Corporate Agents
Source(s): IRDAI

The high adaptability of the POSP model can be attributed to the following:

- 1. Fewer entry requirements:** To become a POSP, an individual must be at least 18 years old and have completed education up to the 10th standard. With simpler training requirements and a quick induction, this model is highly accessible to a wider population.
- 2. Simplified onboarding process:** POSPs can undergo digital training and certification directly through the insurance broker, eliminating the need for in-person certification process that is mandatory for traditional insurance agents. This is streamlining onboarding and training.
- 3. Multi-insurer access:** POSPs reflect an open architecture approach to insurance distribution, enabling individuals to sell products from multiple insurers through a single platform. This multi-brand access enhances customer choice and deepens insurance penetration, especially in underserved markets. Unlike the case for agents – where insurers typically engage only with agents meeting specific premium thresholds, POSPs allow broader participation, empowering even small-scale sellers to contribute.

Between FY2020 and FY2025, POSP-driven GDPI has grown at a CAGR of 23-28%, across motor, retail health and retail life insurance, significantly outpacing traditional channels such as individual agents, corporate agents, and bancassurance. While the POSP channel currently has a limited presence in life insurance, its share is growing, particularly in driving penetration of small, entry-level products. The channel's contribution to premiums is steadily increasing and is expected grow at a CAGR of 24-32% between FY2025 and FY2030, outpacing the industry's growth rate of 10-12%. It is projected to account for 25-29% of motor, 9-10% of retail health, and ~4% of retail life insurance premiums by FY2030. Given the continuous expansion by IRDAI of the ambit of insurance products POSPs can sell, ranging from innovative, customizable covers to broader add-on offerings, the growth potential of the POSP channel could exceed current projections if this enabling regulatory trend continues.

Figure 19: POSP is the fastest-growing distribution channel, with a projected CAGR of 24-32% from FY2025 to FY2030, outpacing the industry growth



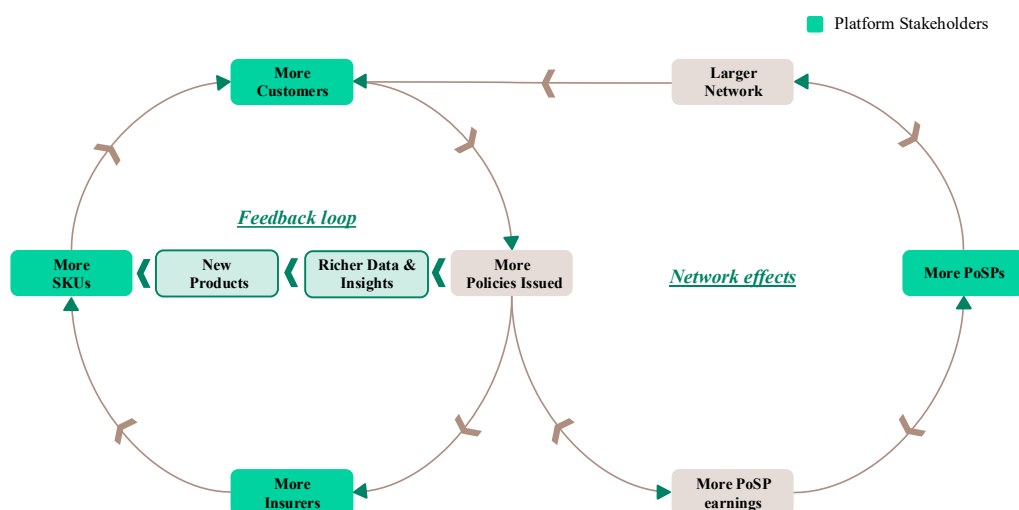
Note(s): (1) GDP collected by POSPs of brokers considered for estimates, Others includes Individual Agents, Corporate Agents – Banks and Others, Brokers, Microinsurance agents, Web aggregators, Insurance Marketing Firms, and Common Service Centres (2) E- Expected (3) Conversion rate of US\$ 1 = ₹85

Source(s): IRDAI, GIC, Redseer Analysis and Estimates

A key enabler of this growth has been the model's inherent flexibility and digital-first design. POSPs operate with access to multiple insurers, allowing them to offer flexible and diverse solutions while leveraging digital platforms for onboarding, policy issuance, and servicing. These capabilities have enabled strong penetration in B30+ markets, supported by a younger, tech-savvy workforce that brings localized, relationship-driven service to the previously underserved markets, with the POSP model, thus transforming insurance distribution in India.

This approach has triggered a self-reinforcing flywheel: more customers attract more POSPs, which increases earnings potential for POSPs and strengthens engagement. In turn, this leads to more policies issued, richer data and insights, and continuous product innovation. As the ecosystem expands, these network and feedback effects compound, enhancing customer value, driving platform-wide efficiency, and reinforcing the model's competitive advantage. The flywheel effect ensures that as the network grows, the value proposition for all participants strengthens, driving further engagement, operational efficiency and platform expansion.

Figure 20: POSP platform flexibility unlocks self-reinforcing flywheels driving scale, engagement, and innovation



Source(s): Redseer research

Some of the key above mentioned drivers enabling this shift towards a POSP-led insurance distribution model in India are explained as follows:

1. Favourable profiles of POSPs

Rising education levels are expanding the POSP talent pool, with over 13 million HSC pass-outs in FY2024 and 10.7 million higher education graduates in FY2022. Coupled with minimal qualification requirements and no upper age limit, the POSP model attracts a broad and diverse workforce, including students, housewives, gig workers, and even retirees. This flexibility enables insurers to mobilize underutilized human capital across urban and rural markets, creating a scalable, low-cost distribution engine.

POSPs are particularly inclined to distribute simple, pre-underwritten products such as two-wheeler insurance, low-premium health plans, and personal accident policies – products that require minimal servicing and are easy to explain. As smartphone penetration continues to grow at a CAGR of 7-9% through FY2030, POSPs are well-positioned to leverage digital platforms for onboarding, policy issuance, and customer servicing. This digital enablement enhances their productivity, reduces cost-to-serve, and allows insurers to expand reach into underserved and emerging customer segments with speed and efficiency.

Importantly, the POSP model also enables the seamless onboarding of Independent Financial Advisors (IFAs) and Direct Selling Agents (DSAs), allowing them to expand their product portfolio and tap into insurance distribution with minimal regulatory overhead.

2. The increasing number of POSPs, particularly across B30+ markets, is driving broader reach and contributing to the overall growth of the insurance ecosystem.

POSPs have broad penetration across India, driven by lower entry barriers, cross-product selling abilities, and their selling of low-ticket insurance products, particularly suited for first-time buyers in B30+ markets. POSPs, thus, have played a critical role in expanding insurance penetration across B30 markets, where formal insurance awareness and access remain limited. The model is uniquely effective in these markets, as POSPs are often trusted by local individuals, thus maintaining strong relationships within the concerned communities,

minimizing the need to recruit traditional agents or relationship managers. This existing trust, combined with simplified product offerings and mobile-first digital tools, enables POSPs to seamlessly onboard customers, issue policies, and manage renewals without the need for physical infrastructure. With substantial untapped demand in B30+ markets, prioritizing these markets presents a strong growth opportunity for the POSP model.

3. POSPs is a cost-effective distribution model offering 8-10% cost savings to insurers:

POSP model is a digitally enabled and low-cost compared to traditional channels such as agency and bancassurance. Typically operating through the broker channel, POSPs help insurers reduce distribution expenses by eliminating the need for physical infrastructure and conventional employment structures. The mobile-first, digital model enables seamless onboarding, policy issuance, and customer servicing – creating a more agile and scalable salesforce. Unlike traditional agents who must meet minimum business thresholds to remain active or maintain contracts, POSPs can be engaged flexibly without such barriers due to lower overhead costs.

When benchmarked against insurance agent channel, broker channels which employ POSPs tend to incur lower non-commission costs, often delivering 8-10% cost savings to insurers.

4. POSP growth enables employment generation as well as drives partnerships with other retail financial distribution model

a. Income opportunities

The Worker Population Ratio⁴ stands at a modest 58.2% in CY2024 and formal job opportunities remain limited, particularly in non-metro and semi-urban regions. Among those engaged in non-agricultural sectors, 78.9% in rural areas and 66.2% in urban areas are employed in informal enterprises. With low entry barriers and flexible working models, the POSP creates meaningful income opportunities across diverse segments of the population where formal employment remains constrained. The model often serves as a secondary income stream for students, homemakers, retirees, and small business owners, enabling these micro-entrepreneurs to independently manage and grow their income.

b. Significant synergies with adjacent products:

POSPs are evolving into multi-product financial advisors by leveraging their community networks to offer adjacent financial products beyond insurance, such as Independent Financial Advisors (“IFAs”) and Direct Selling Agents (“DSAs”). By leveraging their existing, trusted customer relationships, POSPs are well-positioned to cross-sell adjacent financial products such as mutual funds and loans. This diversification opens up access to a ₹0.15-0.2 trillion distribution pool in mutual funds and upto ₹2.5 trillion opportunities in loan distribution as of FY2024.

By lowering entry barriers and adopting a more inclusive model, the POSP model not only expands insurance penetration but also fosters local employment and supports economic growth.

3.5. POSP-led simple motor, retail health, and life insurance products are ideal for B30+ markets, with digital infrastructure key to unlocking scale and efficiency

A significant share of India’s insurance market is concentrated in low-ticket, standardized products, making it highly amenable to scale through POSP-led assisted distribution. This becomes particularly

⁴ Worker Population Ratio is defined by the Ministry of Statistics and Programme Implementation as the percentage of employed persons in the population.

important for B30+ markets with lower insurance penetration and lower monthly household incomes. In motor insurance, majority of the GDPI is driven by policies with a sum insured below ₹0.5 million, largely comprising mandatory Third Party (“TP”) and simplified Own Damage (“OD”) covers that require minimal underwriting or customer education. Similarly, in health insurance, nearly 75% of GDPI comes from products under ₹0.5 million, which fall within the typical POSP distribution scope, characterized by pre-underwritten, easy-to-explain offerings. Moreover, the simplicity and uniformity of insurance products, such as motor, health and life insurance, make tech-enabled POSP models especially effective for reaching first-time buyers and driving insurance penetration in underserved markets.

For POSPs, digital tools significantly enhance productivity and income potential. App-based onboarding, real-time access to product training, sales enablement content, and lead management tools help agents improve both sales conversion and customer engagement. Dashboards track performance and commissions, enabling more transparent earnings and faster payouts. Additionally, technology empowers POSPs to serve a multi-product, multi-brand and multiple lines of business portfolio, access instant underwriting decisions, and manage end-to-end sales journeys from a single platform.

For customers, the tech-enabled POSP model offers a superior experience defined by greater choice, convenience, and transparency. With digital access to multiple insurers, POSPs enable real-time comparisons, tailored recommendations, and instant quotes, helping customers make informed decisions. The journey is fully digital, with paperless policy issuance and app-based payments. Post-purchase, customers benefit from digital claims tracking, faster grievance redressal, and centralized support, which is especially critical in B30+ markets where first-time buyers often need both guidance and assurance.

Figure 21: Tech-enabled POSP model is right to drive insurance distribution and servicing B30+ markets

		Tech-enabled POSP model	Traditional model
Customer Experience Metrics 	Choice & Product Access	• Multi-brand access with real-time comparisons	• Limited to only a few insurers
	Policy Issuance	• Instant, paperless issuance via app/web	• Manual, 2–5 days with paperwork
	Transparency	• Clear comparison of premiums, benefits, coverage	• Limited visibility on pricing/features
	Post-sales & Claims	• Digital tracking as well as manual support	• Fully manual claims process
POSP Enablement Metrics 	Onboarding & Licensing	• App-based onboarding, instant IRDAI approval, on-demand digital training modules	• Manual paperwork, in-person certification, in-person periodic training
	Lead Management & Sales Tools	• In-app lead tracking, auto-reminders, in-app product engine with quote tools	• Manual follow-ups and paper-based tools
	Performance tracking	• Real-time dashboard on earnings	• Limited visibility on real-time updates
	Reach	• Pan-India reach via tech and remote onboarding	• Localised, can lead to cost inefficiencies
Operational & Business Metrics 	Ease of scalability	• Scalable tech to cater to other lines-of-business	• Low ease of and slower scalability
	Cost-to-serve	• Lower (digital infra, remote servicing)	• High (manual servicing, offline support)
	Compliance & Reporting	• Automated, real-time data capture	• Manual, lack of real-time updates

Note(s): The traditional model refers to traditional advisors (defined as “Individual Agents”) who historically represented a single life and general insurer, SAHI (Standalone Health Insurer), Agriculture Insurance Company of India, and Export Credit Guarantee Corporation of India, and primarily operated through offline channels

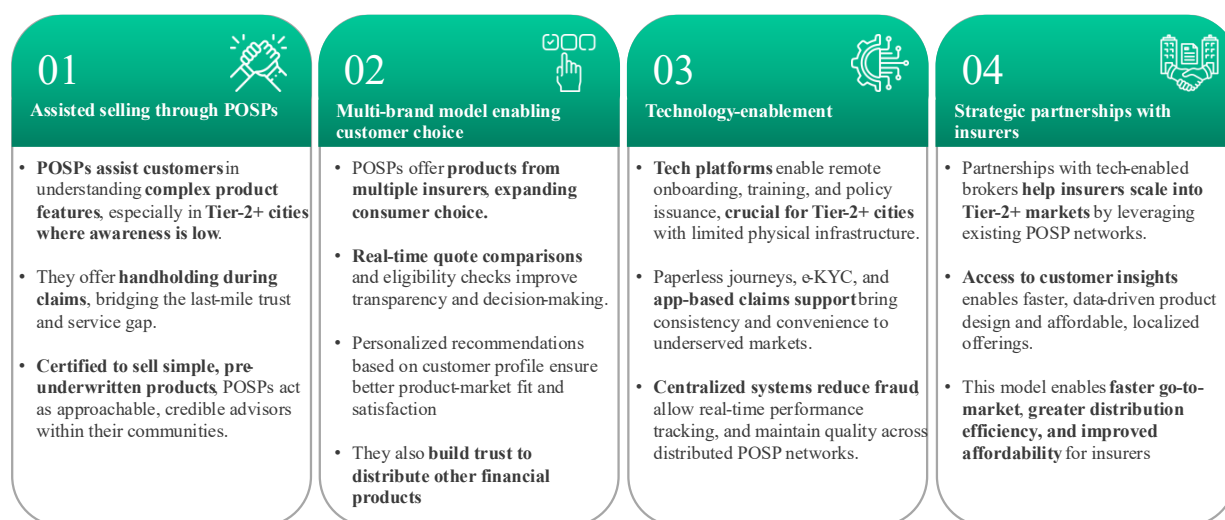
Source(s): Redseer research

3.6. The right-to-win the insurance distribution space in India is governed by 4 key levers: (i) assisted selling through POSPs, (ii) multi-brand model enabling customer choice, (iii) technology enablement, and (iv) distribution partnerships

India's insurance distribution model is undergoing a transformation, driven by regulatory innovation, expanding POSP adoption, and the ongoing push for digitization. Four core levers are central to this evolution: assisted selling through POSPs, multi-brand model enabling customer choice, technology enablement, and distribution partnerships. These levers are crucial for scaling insurance penetration, improving efficiency, and driving market growth. The POSP model empowered with digital tools and advisory support is expected to drive insurance adoption and support the goal of increasing insurance penetration across India.

In parallel, many distribution companies have expanded their portfolio beyond insurance to include ancillary financial products such as mutual funds, personal loans, credit cards, and fixed deposits. These offerings not only deepen customer engagement but also create opportunities for cross-selling, allowing platforms to position themselves as holistic financial services providers.

Figure 22: The next wave of insurance penetration will be led by the tech-enabled, multi-brand POSP model, enabling insurers greater distribution efficiency and reach



Source(s): Redseer research

Chapter 4: Competitive Benchmarking

The digital insurance distribution model, operating through POSPs, has witnessed the emergence of multiple players and showcased a competitive environment in recent years. Three players, namely, Turtlemint (“Turtlemint Fintech Solutions Limited”), Policybazaar (“PB Fintech Ltd.”), and InsuranceDekho (“Girnar Insurance Brokers Private Limited”), collectively the “Peer Group”, have emerged as among the leading players in the digital insurance distribution space, operating via the POSP model and each generating over ₹5000 million in revenue from operations in FY2024. Only one listed peer has been considered, as Policybazaar is the sole listed company in this space.

In 2015, Turtlemint became the first to adopt the POSP distribution model among the Peer Group and today also has the largest certified POSP network among the Peer Group as of March 31, 2025 as well as December 31, 2025⁵. Turtlemint Insurance Broking Services Private Limited (“TIB”) was incorporated on October 24, 2013 and received its broking license from the IRDAI on April 3, 2014. Following the issuance of the Guidelines on Point of Sales Person - Non-Life & Health Insurers (IRDA/Int/ GDL/ ORD/ 183/ 10/2015) (“PoSP Regulations”) in 2015, TIB began adopting the PoSP model and established internal enablers, including collection of KYC documents and creation of systems and processes to onboard PoSPs. Within the Peer Group, InsuranceDekho (i.e., Girnar Insurance Brokers Private Limited) was incorporated in May 2016, and Policybazaar’s PoSP initiative, PB Partners, was launched in July 2021.

Turtlemint has also significantly outpaced the growth of the overall retail insurance market, in terms of GDPI. While the combined growth rate of retail health, retail life new business, and motor insurance stood at a CAGR of approximately 10.3% between FY2020 and FY2025, Turtlemint achieved a GDPI growth (within the same categories) of approximately 3.00 times higher in the period. As of December 31, 2025, Turtlemint has partnered with 45 insurer partners, representing over 75% of all life and general insurers in India.

The insurance distribution landscape has undergone a fundamental transformation with the rise of digital platforms. Traditionally, insurance was sold primarily through offline channels, Individual Agents, Brokers, and Bancassurance (Corporate Agents – Banks and Others), often resulting in a fragmented customer experience. However, with the advent of digitisation, a new generation of tech-enabled insurance brokers has emerged. These platforms offer a consolidated interface where customers can research, compare, and purchase policies across multiple insurers, enhancing accessibility, choice, and transparency. Recognising that customers still require assistance throughout the insurance journey, especially during product selection and claims, these digital brokers have adopted the POSP model.

Turtlemint has a registered POSP growth rate of ~41% as compared to the industry average for the POSP growth rate was approximately 35% between FY2021 and FY2025. In FY2025, the insurance industry had approximately 2.7 million POSPs, of which Turtlemint accounted for ~15.97% (0.43 million POSPs). By building a large network of POSPs who engage customers offline or through hybrid models, they combine the convenience of digital platforms with the trust and guidance of in-person advisory. As of December 31, 2025 as well as March 31, 2025, Turtlemint operates the largest number of registered POSP distribution network among the Peer Group⁵. From FY2023 to 9M FY2026,

⁵ For 9M FY2026 (as of December 31, 2025), only the POSP network of InsuranceDekho (Girnar Insurance Brokers Private Limited) has been considered in the peer group, as Competition Commission of India (“CCI”) approval for the merger between InsuranceDekho and RenewBuy was received in November 2025.

Turtlemint facilitated distribution of 21.87 million insurance policies across 19,171 pin codes, representing 97.88% of the total pin codes (i.e., 19,587 pin codes⁶) in India.

As of FY2025, ~73.78% of Turtlemint's platform premiums originate from B30+ markets. On the other hand, the industry share of premium from B30+ markets in motor, retail health, and life insurance new business was 50-60% as of March 31, 2025.

As of March 2025, Turtlemint Pro has recorded the highest number of downloads among insurance seller apps⁷ in India, as per Sensor Tower, a market intelligence firm.

4.1. Peer Group Benchmarking

The digital insurance distribution landscape comprises a limited set of players with revenues exceeding ₹5,000 million, defined here as the Peer Group. These players are benchmarked against select financial and operational metrics outlined below. InsuranceDekho ("Girnar Insurance Brokers Private Limited") has been excluded from the benchmarking due to insufficient disclosures as it remains unlisted.

Figure 23: Definitions of key metrics

Metric	Turtlemint (Turtlemint Fintech Solutions Limited) ¹	Policybazaar (PB Fintech Ltd.) ²
Revenue from operations	Revenue recognized in accordance with Ind AS on proforma basis	(i) For 9M FY2026 and 9M FY2025 – Revenue from operations is as mentioned in the Q3 FY2025-26 Consolidated Statement of Financial Results for the Quarter and Nine Months Ended December 31, 2025 (ii) For FY2025 and FY2024 – Revenue from operations is as mentioned in the Q4 FY2024-25 Consolidated Statement of Financial Results for the Quarter and Year Ended March 31, 2025 (iii) For FY2023 – Revenue from operations is as mentioned in the Q4 FY2023-24 Consolidated Statement of Financial Results for the Quarter and Year Ended March 31, 2024
Total Premium	Total premium (i.e payment and consideration) received on insurance policies (net of Goods and Service Tax) that were issued or re-issued by an insurance company through the platform on proforma basis	(i) For 9M FY2026 and 9M FY2025 – Total premium is as mentioned in the Q3 FY2025-26 Earnings Call Deck, given for overall business (Core Online Business + New Initiatives) (ii) For FY2025, FY2024 and FY2023 – Total premium is as referred to in the FY2024-25 Annual Report as "Insurance Premium"
Adjusted EBITDA	Adjusted EBITDA for the relevant period/ year equals loss for the period/ year plus total tax expense, finance costs, depreciation, amortisation expense, share based payment expense and exceptional items less other income	(i) For 9M FY2026 and 9M FY2025 – Adjusted EBITDA (Consolidated) is a non-GAAP measure excluding ESOP charges, given for overall business (Core Online Business + New Initiatives) as per the Q3 FY2025-26 Earnings Call Deck (ii) For FY2025 and FY2024 – Adjusted EBITDA (Consolidated) is a non-GAAP measure excluding ESOP charges, given for overall business (Core Online Business + New

⁶ As per the latest update published in October 2025 by the Ministry of Communications, Department of Posts.

⁷ Insurance seller app is defined as a non-consumer facing mobile application for insurance intermediaries to digitally issue insurance policies to consumers. The number of downloads are captured from January 2014 to March 2025.

		Initiatives) as per the Q4 FY2024-25 Earnings Call Deck (ii) For FY2023 – Adjusted EBITDA (Consolidated) is non-GAAP measure excluding ESOP charges, given for overall business (Core Online Business + New Initiatives) as per the Q4 FY2023-24 Earnings Call Deck
Number of POSPs	Refers to insurance agents who have completed the mandatory training, enabling them to obtain the requisite certification to distribute insurance products on proforma basis in accordance with applicable IRDAI regulations, including the Guidelines on Point of Sales Person - Non-Life & Health Insurers (IRDA/ Int/ GDL/ ORD/183/ 10/2015) and any subsequent amendments	(i) For 9M FY2026 – Number of POSPs is the number of Partners (PB Partners) as per mentioned in the Q3 FY2025-26 Earnings Call Deck (ii) For 9M FY2025 – Number of POSPs is the number of Partners (PB Partners) as per mentioned in the Q3 FY2024-25 Earnings Call Deck (iii) For FY2025 – Number of POSPs is the number of Partners (PB Partners) as per mentioned in the Q4 FY2024-25 Earnings Call Deck (iv) For FY2024 – Number of POSPs is the number of Partners (PB Partners) mentioned in the FY2023-24 Annual Report (v) For FY2023 – Number of POSPs is the number of Partners (PB Partners) mentioned in the FY2022-23 Annual Report
Percentage of Total Premium distributed in B30+ markets	Percentage of Total Premium distributed in B30+ markets refers to the percentage of premium on policies issued by the insurance companies through the platform in pin codes belonging to the B30+ markets on proforma basis	-

Figure 24: Key Metrics (9M FY2026)

Metric	Unit	Turtlemint (Turtlemint Fintech Solutions Limited) ¹	Policybazaar (PB Fintech Ltd.) ²
Year of Incorporation	NA	2015	2008
Revenue from operations	₹ million	7,410.70	47,326.90
Total Premium	₹ million	26,315.69	2,07,170.00
Adjusted EBITDA	₹ million	(1,083.33)	4,450.00
Number of POSPs	'000	507.12	400+
Percentage of Total Premium distributed in B30+ markets	%	75.13%	NA

Note(s): (1) Definitions are as mentioned in the 'Definitions of key metrics' table above, (2) Numbers are rounded to nearest 2 decimals as data is available.

Source(s): Company shared data, Earnings Call Deck, Financial Results

Figure 25: Key Metrics (9M FY2025)

Metric	Unit	Turtlemint (Turtlemint Fintech Solutions Limited) ¹	Policybazaar (PB Fintech Ltd.) ²
Year of Incorporation	NA	2015	2008
Revenue from operations	₹ million	4,110.67	34,693.40

Total Premium	₹ million	19,692.60	1,47,990.00
Adjusted EBITDA	₹ million	(1,431.57)	1,840.00
Number of POSPs	'000	413.12	~270
Percentage of Total Premium distributed in B30+ markets	%	73.09%	NA

Note(s): (1) Definitions are as mentioned in the 'Definitions of key metrics' table above, (2) Numbers are rounded to nearest 2 decimals as data is available.

Source(s): Company shared data, Earnings Call Deck, Financial Results

Figure 26: Key Metrics (FY2025)

Metric	Unit	Turtlemint (Turtlemint Fintech Solutions Limited) ¹	Policybazaar (PB Fintech Ltd.) ²
Year of Incorporation	NA	2015	2008
Revenue from operations	₹ million	7,002.65	49,772.10
Total Premium	₹ million	29,459.36	2,34,860.00
Adjusted EBITDA	₹ million	(1,863.27)	3,330.00
Number of POSPs	'000	434.16	300+
Percentage of Total Premium distributed in B30+ markets	%	73.78%	NA

Note(s): (1) Definitions are as mentioned in the 'Definitions of key metrics' table above, (2) Numbers are rounded to nearest 2 decimals as data is available.

Source(s): Company shared data, Earnings Call Deck, Financial Results

Figure 27: Key Metrics (FY2024)

Metric	Unit	Turtlemint (Turtlemint Fintech Solutions Limited) ¹	Policybazaar (PB Fintech Ltd.) ²
Year of Incorporation	NA	2015	2008
Revenue from operations	₹ million	5,641.68	34,376.80
Total Premium	₹ million	22,731.10	1,58,750.00
Adjusted EBITDA	₹ million	(1,821.21)	1,440.00
Number of POSPs	'000	334.60	200+
Percentage of Total Premium distributed in B30+ markets	%	71.15%	NA

Note(s): (1) Definitions are as mentioned in the 'Definitions of key metrics' table above, (2) Numbers are rounded to nearest 2 decimals as data is available.

Source(s): Company shared data, Annual Reports, Earnings Call Deck, Financial Results

Figure 28: Key Metrics (FY2023)

Metric	Unit	Turtlemint (Turtlemint Fintech Solutions Limited) ¹	Policybazaar (PB Fintech Ltd.) ²
Year of Incorporation	NA	2015	2008
Revenue from operations	₹ million	5,379.75	25,578.50
Total Premium	₹ million	22,154.86	1,15,890.00
Adjusted EBITDA	₹ million	(2,921.97)	(1,190.00)
Number of POSPs	'000	286.15	120+
Percentage of Total Premium distributed in B30+ markets	%	71.64%	NA

Note(s): (1) Definitions are as mentioned in the 'Definitions of key metrics' table above, (2) Numbers are rounded to nearest 2 decimals as data is available.

Source(s): Company shared data, Annual Reports, Earnings Call Deck, Financial Results

The Indian insurance distribution space has seen a surge of new-age players entering the market, driven by regulatory liberalization, improved internet penetration, and rising awareness around insurance, especially post-COVID. These emerging players are leveraging digital infrastructure, and mobile-first experiences to address long-standing inefficiencies in how insurance is discovered, sold, and serviced.

Modern digital platforms are adopting fintech- and e-commerce-inspired models, offering personalized policy recommendations, microinsurance products, and frictionless end-to-end journeys. The ecosystem is empowering POSPs with comprehensive digital toolkits and embedded insurance models are gaining traction by seamlessly bundling coverage into transactions like travel bookings, electronic purchases, and loan disbursements, fundamentally reshaping the moments at which consumers interact with insurance.

Chapter 5: Threats and Challenges

Some of the threats and challenges facing the digitally-enabled brokers are as follows –

1. Evolving regulatory environment

IRDAI is actively updating guidelines around POSP licensing, product suitability, and digital sales practices. While these measures aim to enhance customer protection and market transparency, they could moderately increase compliance burden and operational costs for brokers. Staying agile and adapting processes early will be important. Additionally, insurers are required to adhere to various regulations regarding EOM including robust governance frameworks. As insurers seek to comply with these EOM regulations, they may reduce commission rates or impose additional restrictions on compensation and allowances paid to distribution partners

2. Rise of insurers' D2C channels

Insurers are gradually investing in their own digital acquisition and servicing platforms to reduce reliance on intermediaries. While brokers remain key distribution partners today, a long-term shift towards insurer-led D2C could create incremental pressure on broker-led business volumes. Strengthening broker-insurer partnerships will be crucial to retain relevance.

3. POSP engagement and retention dynamics

Given that many POSPs treat insurance distribution as a secondary or part-time activity, maintaining consistent productivity requires continuous upskilling, digital enablement, and financial incentives, driving expenses Building stronger loyalty programs and offering differentiated career paths could help stabilize POSP networks over time.

4. Competitive intensity

The POSP-driven digital broking space is witnessing intensifying competition from incumbents and newer entrants alike, including traditional insurance intermediaries with a strong offline presence, insurance companies through their agency channels, banks and non-banking financial companies with extensive customer bases and distribution networks with cross-selling initiatives, other digital insurance marketplaces, aggregators and intermediaries, and direct-to-consumer online sales channel. The competitive environment is further intensified by the entry of technology-driven players who are leveraging data analytics, artificial intelligence and digital marketing to enhance customer experience and streamline the insurance purchase process. Rising customer acquisition costs could put pressure on unit economics, making it critical for brokers to focus on brand differentiation, technology-driven lead management, and improved agent productivity.

5. Cross-sell and customer lifetime value optimization

While brokers have scaled initial acquisition effectively, cross-sell into higher-margin categories like health and life insurance remains under-penetrated. Enhancing cross-sell engines and building deeper multi-product customer relationships will be key levers to maximize lifetime value and margin expansion.

Glossary

#	Terms in Use	Definition
1	Assisted selling	A distribution approach where a sales representative, agent, or intermediary supports the customer throughout the insurance purchase journey- explaining product features, aiding in documentation, and offering post-sale assistance
2	B30+	Rest of India except Top 30 cities by population
3	CY	CY refers to a calendar year ended December 31
4	CAGR	Compounded Annual Growth Rate
5	City classification	• Metro cities indicate 8 cities, namely – Mumbai (Maharashtra), Delhi (NCT), Bangalore (Karnataka), Chennai (Tamil Nadu), Hyderabad (Telangana), Kolkata (West Bengal), Pune (Maharashtra) and Ahmedabad (Gujarat) • Tier 1 refers to cities with a population of more than 1 million, excluding metro cities • Tier 2+ refers to cities with a population of less than 1 million
6	Common Service Centres (CSC)	Physical facilities for delivering Government's e-Services to rural and remote locations where availability of computers and Internet was negligible. It is aimed at increasing insurance penetration in villages
7	Current Health Expenditure	Current Health Expenditure constitutes only recurrent expenditures for healthcare purposes net all capital expenditures (as defined by the Ministry of Health & Family Welfare, GOI)
8	Digital Personal Data Protection Bill	A legislative framework introduced by the Government of India to safeguard personal digital data. It outlines obligations of data fiduciaries, rights of data principals, and mechanisms for data processing, consent, storage, and cross-border transfer in alignment with global privacy standards.
9	Digital Public Infrastructure (DPI)	Open technology blocks or platforms such as digital identification (Aadhaar), payment infrastructure (UPI), data exchange (E-KYC), etc. They form digital networks that enable digital transformation and enhance accessibility of all goods and services
10	E-KYC	E-KYC refers to Electronic Know-Your-Client
11	EOM- Expense of Management	Refers to the total operational expenses incurred by an insurance company for managing its business.
12	Estimated (E)	Wherever the data for given timelines is estimated (and not actual) the timelines in the chart has been denoted as xxE (where xx stands for the year in question). E.g.: FY23E stands for estimated values of financial year 2023
13	Financial Assets	Financial assets include insurance, mutual funds, equity, provident fund, other fixed income instruments, etc.

14	Financial Inclusion Index	An index developed by the Reserve Bank of India to measure the extent of financial inclusion across three parameters: access, usage, and quality of financial services. It captures the progress of financial inclusion across states and population segments.
15	Fiscal or FY	Fiscal or FY refers to a financial year ended March 31
16	GDP per capita	The gross domestic product divided by the total population. It indicates the average economic output (income) per person.
17	Gross Direct Premium or GDPI	Gross Direct Premium Income or GDPI refers to actual premium collected from selling insurance policies
18	Gross National Income	The total domestic and foreign income earned by a country's residents. It includes GDP plus net income received from abroad (such as remittances and foreign investments).
19	Gross Written Premium	Gross Written Premium is sum of gross direct premium income and premium on reinsurance accepted
20	Group Health Insurance	Group health insurance entails health insurance coverage to a group of individuals, typically employees of a company
21	High-income Household	Household with an annual income more than ₹1.1 million (US\$3,500)
22	Independent financial advisors	Professionals who provide personalized financial guidance and product recommendations to clients. They operate independently and are not tied to specific financial institutions or insurers.
23	Insurance density	It is the ratio of gross direct premiums to the population of the country. It is premium per capita
24	Insurance penetration	It is the ratio of gross direct premiums to nominal GDP (GDP at current prices) of the country
25	Insurtech	It is a combination of insurance and technology solutions for enrolment, insurance claims processing, underwriting, policy administration, data insights, fraud detection and more.
26	Jan Dhan-Aadhaar-Mobile (JAM) trinity	An initiative by the Government of India integrating bank accounts (Jan Dhan), digital identity (Aadhaar), and mobile connectivity to improve delivery of financial and welfare services, thereby promoting financial inclusion.
27	Lower income	Household with an annual income less than ₹0.3 million (US\$13,000)
28	Lower middle income	Household with an annual income between ₹0.3-0.8 million (US\$ 3,500-9,400)
29	Pradhan Mantri Jan Dhan Yojana (PMJDY)	A national mission on financial inclusion launched by the Government of India to provide universal access to banking facilities. It offers zero-balance bank accounts, debit cards, insurance, and pension products to unbanked individuals.

30	PM Gati Shakti National Master Plan	An integrated infrastructure development plan initiated by the Government of India aimed at improving multimodal logistics, enabling faster economic growth through seamless connectivity across sectors.
31	Pradhan Mantri Gramin Digital Saksharta Abhiyan (PMGDISHA)	A scheme to promote digital literacy in rural India by training individuals to operate digital devices and access digital services, including online banking and government e-services.
32	POSP	Point-of-sale person (POSPs) refers to insurance agents who have completed the mandatory training, enabling them to obtain the requisite certification to distribute insurance products in accordance with applicable IRDAI regulations, including the Guidelines on Point of Sales Person - Non-Life & Health Insurers (IRDA/ Int/ GDL/ ORD/183/ 10/2015) and any subsequent amendments
33	Private Final Consumption Expenditure	It refers to the total value of all goods and services consumed by households and non-profit institutions serving households within a country.
34	Projected (P)	Wherever the data for given timelines is projected (and not actual) the timelines in the chart has been denoted as 20xxP (where xx stands for the year in question). E.g.: FY2030P stands for projected values of financial year 2030
35	Protection gap	The protection gap is the uninsured or unprotected portion of the resources needed to fully mitigate risk.
36	Retail Health Insurance	Retail health insurance entails health insurance coverage to individuals or families
37	Smart Cities Mission	An urban renewal and retrofitting program by the Government of India aimed at developing 100 smart cities with core infrastructure, sustainable environment, and use of technology to improve urban living standards.
38	T30	T30 refers to Top 30 cities in India in terms of population, namely Mumbai, Delhi, Bengaluru, Pune, Kolkata, Ahmedabad, Chennai, Hyderabad, Vadodara, Jaipur, Surat, Lucknow, Nagpur, Kanpur, Nashik, Indore, Coimbatore, Patna, Chandigarh, Bhopal, Ludhiana, Rajkot, Udaipur, Bhubaneswar, Guwahati, Ranchi, Jamshedpur, Dehradun, Varanasi, Agra
39	Upper Middle-income Household	Household with an annual income between ₹0.8-1.1 million (US\$9,400-13,000)
40	US\$	United States Dollar, the currency used in the industry overview section for depicting various market sizes at the exchange rate of 1 US\$ = ₹85. Although the currency rates may fluctuate from the one assumed in the RedSeer Report, RedSeer has maintained a standard practice of keeping the said currency rate to keep consistency across their historic data

41	Worker population ratio	The proportion of the working-age population (typically aged 15 and above) that is actually engaged in productive work (either employed or self-employed), expressed as a percentage of the total population in the same age group.
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Annexure B

List of directors and KMP and SMP is as follows:

Directors

Dhirendra Nalin Mahyavanshi- Chairperson and Managing Director and Chief Executive Officer

Anand Rohidas Prabhudesai- Executive Director and Chief Operating Officer

Anup Wadhawan- Independent Director

Dinanath Mohandas Dubhashi- Independent Director

Ms. Mohua Sengupta- Independent Director

Alok Chandra Misra- Independent Director

KMP

Badrinarayan Sanjeevi- Chief Financial Officer & head of Human Resource

Prashant Saini- Company Secretary and Compliance Officer

SMP

Prajakta Vijaykumar Deolasse- Chief Technology Officer

Janaki Arvind Iyer- Chief Risk Officer

Sunny Bhatia- Senior Vice President - Retail

Shuvamay Chowdhury - Vice President - Retail