

DVARA KSHETRIYA GRAMIN FINANCIAL SERVICES PRIVATE LIMITED

Reg. Off.: 10th Floor, Phase -1, A1, IITM-Research Park, Kanagam
Village, Taramani, Chennai - 600 113

| DVARA KSHETRIYA GRAMIN FINANCIAL SERVICES PRIVATE LIMITED | |
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| POLICY | CUSTOMER GRIEVANCE HANDLING POLICY |
| VERSION | 7.0 |
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| POLICY OWNER | Business |

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VERSION

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|-----------------|--------------------------------|
| Cross Reference | POSH and Whistle Blower Policy |
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GRIEVANCE HANDLING POLICY

I INTRODUCTION

This document outlines the policy that is available to a customer who is dissatisfied with any personnel associated with the Company, a product or service offered by the Company..

This policy follows the under noted principles:

- Customers be treated fairly at all times.
- Complaints raised by customers are to be dealt with courtesy and in time.
- Customers are fully informed of avenues to escalate their complaints/grievances within the organization and their rights to alternative remedy, if they are not fully satisfied with the response of the company to their complaints.

Company will treat complaints efficiently and fairly as they can damage the company's reputation and business if handled otherwise.

II APPLICABLE REGULATORY FRAMEWORK

This is required as per extant RBI guidelines vide its Circular Master Circular Ref. No. DNBS.PD.CC.No. 320/03.10.01/2012-13 dated February 18, 2013 on Grievance Handling and subsequent amendments thereto.

III SCOPE

This document applies to Dvara Kshetriya Gramin Financial Services Private Limited (Dvara KGFS) and its associates/ vendors.

IV PRINCIPLES GOVERNING GRIEVANCE HANDLING

Dvara is committed to maintaining a Grievance handling system which can be accessed by all customers.

- a. All Grievances are handled by a separate team called KGFS Direct. Though the head of KGFS Direct reports to the Chief Business Officer, this is an independent from the other business teams reporting to the CBO. All complaints are reviewed the zonal operations heads, who are not part of the business teams and are taken up for addressal and closure. On a monthly basis, the Central Operations Team presents the complaints to the MD and CEO and others. Complaints are presented to the Board by the Audit team on a quarterly basis.
- b. All grievances are handled in a confidential manner and with a similar level of professionalism as all other official business of Dvara KGFS and periodic communication/ update to customer until resolution is ensured.
- c. The values as articulated in the Dvara KGFS guiding principles are preserved and supported by the grievance handling system.

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- d. Any grievance which comes under the purview of Sexual Harassment or under the purview of Whistle Blower policy will be dealt in accordance with the provisions of the respective policy and the timelines as specified shall be applicable.

V POLICY

Dvara KGFS is committed to maintaining its guiding principles and ensure integrity, responsibility and fair dealing in all customer transactions/interactions, and will continue to strive to maintain the highest standards in its dealings with its customers. In order to maintain these standards, Dvara KGFS is dedicated to identifying, investigating and resolving complaints and grievances of its customers. Dvara KGFS recognizes the importance of transparency in decision making and the need to provide a fair and objective procedure for the review of all decisions. Grievances will be dealt with utmost confidentiality and Dvara KGFS encourages all its customers to provide feedback which will help enhance organizational effectiveness.

VI PROCEDURE

1. Grievance can be submitted in person/ voice / writing through any of the following methods:
 - a. **Complaint/ Suggestion box:** A complaint box is installed in all branches, wherein the customers can write and submit their complaints/ suggestions. The complaint box shall be opened by Branch Manager/Cluster Manager, twice a week. The customer may be contacted by an authorized official (based on the grievance raised – it could be Cluster Manager/ Branch staff) for further information, and the resolution is provided. This will be part of the complaint register maintained at the branches.
 - b. **Telephonic:** A tollfree helpline number is displayed at the branches for customers to lodge their grievances/complaints over phone at the KGFS Direct Helpdesk.
 - c. **Over the Counter:** The customer can walk into the branch and register the complaint with the Wealth Manager/Branch Manager .
 - d. **Website:** Customers can log in to our website and register their complaints.
 - e. **E-Mail:** Customers can send their grievances to mail id: info@dvarakgfs.com
 - f. **Through Whatsapp** – Dvara provides a Whatsapp channel of communication for customers registering a complaint.
 - g. **We also encourage customers to register their complaints, in general and more specifically regarding any collection, or rude of our staff , at the toll-free number during our Compulsory Group Meeting for group loans and during Individual Loan appraisal process.**
2. If the grievance is raised in person, it is the responsibility of the Wealth Manager (WM) / BSE / BM to record the issue with helpdesk and resolve the issue/ take the help of Branch Manager/ Cluster

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Manager to resolve the issue. On resolution, Branch Manager/Cluster Manager to notify the Helpdesk with complete details. If the grievance is raised through Complaint/Suggestion Box at the branch, it is the responsibility of the Branch Manager to record the issue with helpdesk and resolve the issue/ take the help of Cluster Manager to resolve the issue. On resolution, Branch Manager has to notify the Helpdesk with complete details. If a call is lodged with the helpline number, then it is directly handled by the Helpdesk team and it is their responsibility to resolve the issue with the help of Cluster Manager. If the grievance is received against the branch officials, the Cluster Manager shall directly investigate and resolve the issue.

3. Process of Recording of Grievance

Customers are encouraged to call through the Toll Free number, (1800 102 9370) which has been printed on the receipts / repayment schedule that are given to the customers and also has been prominently displayed at the branches. During CGT, customers are informed of this number.

Customers calling on the number are attended to between 9.30 am and 6:00 pm on all working days. The details of the complaints are sent to the respective KGFS's, who act upon it, resolve the same and advise the KGFS Direct Helpdesk about the closure of the same.

Process of Recording of Grievance received at Branches – Oral / Complaint Box

The branches record the oral complaints and the complaints received at the suggestion box in the complaint register. These are sent to the KGFS Direct Helpdesk on a daily basis by the Operation Team at the respective KGFS's who would collate these complaints from the branches. .

The branches shall attend to these complaints and advise resolution back to the KGFS Direct Helpdesk through KGFS Operations Teams.

KGFS Direct Helpdesk shall also call these customers to confirm resolution before closing the complaints.

Process of Recording of Grievance received through Toll-Free Number

- Customer calls the Toll-Free number 1800-102-9370 between 9:30 AM and 6:00 PM on all working days.
- The calls are automatically received which is linked to our Third party service provider Cloud Telephony Solution.
- On receipt of the call IVR asks the customer to choose from any of the 6 languages : Option 1 for Tamil, 2 for Hindi, 3 for Odiya and 4 for Kannada, 5 for Telugu and 6 for Punjabi
- The calls land at KGFS Direct Helpdesk to the Direct WM based on language chosen.
- A complaint number is generated by the CRM and at the end of the call, all customers are given the complaint number for future reference.
- Each complaint is forwarded to the branches and the KGFS Operations Teams.

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- Issues are marked as closed if it is responded and resolved on the call itself. Others are marked as “open” and will be sent to the respective branches for resolution. It will remain in “Open” status till the issue gets resolved.
- Resolution of complaints is done by the branches and are confirmed by mail to KGFS Direct Supervisor, who monitors the complaints and the closures
- The KGFS Direct Supervisor and the Central office shall perform the following activities:
 - Missed / Non spoken calls during office hours – This means that the Direct WM has not attended the call. Customer has called, but the call duration is NIL or missed. These customers will be called back by the KGFS Direct Team.

The MIS will provide the number from where the call has come. The number has to be checked against the registered mobile numbers of the clients. This list will be passed on to the respective KGFS for contacting the customer, taking the query and for resolution.

If the call is from an unknown number and if the caller has chosen the language, it will be sent to the respective Direct WM.

- **Missed calls from customers** – These are calls received from the customers after office hours. The above process will be following by the KGFS Direct.
 - The Supervisor shall ensure that the resolution is proper and the details are correctly updated on the file.
 - Supervisor will send a periodical MIS to the KGFS Operations Head, KGFS Head, the audit team and the senior management.
 - KGFS Direct Supervisor is responsible for the TAT of closure of complaints.

Overview of Customer Service

Customer interactions are categorized as under:

Queries (Q) - Customer requirements which can be attended to and closed immediately, without requirement of further processing.

Requests (R) - Customer requirements which need further processing and are not in the nature of complaint.

Complaints (C) –. Complaints should be raised in the following scenarios.

- Non-closure of request within promised timeframe (TAT).
- Deficiency in Promised action and services provided to the customers in writing
- Breach of agreed terms and conditions of the loan contract
- Wrong commitment and non-disclosure of material terms as defined in the Fair Practices Code.
- Action and behaviour of the company employee and partner resulting in dissatisfaction / financial loss / and where customers have cited facts of incident.

All interactions with customers are recorded in the Customer Relationship Management (CRM) system as one of the above types (Q/R/C). The tagging is done based on the Business Process the interaction relates to and detailed scenarios of the customers’ queries. A typical Query/Request/Complaint tagging is like:

| Category | Type of Issue | Sub -Type of Issue |
|-----------|--------------------------|---|
| Query | Loan related | Loan/Interest/charges related - General query |
| Request | New loan enquiry/request | Customer wants to apply loan |
| Complaint | Loan related | Loan closed but Highmark not removed |

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Escalations

| Escalation Matrix | |
|-------------------|--|
| Level 1 | Customer can log the complaint with Dvara KGFS - Direct Team & Branch, the contact details of the officials are available in notice board of each branch. |
| |  Toll-Free - 1800 102 9370 |
| |  customer.support@dvarakgfs.com |
| |  In-branch-Branch Walk in |
| |  Website-Online Web Form |
| |  WhatsApp-What's app chatbot: - 7358235550 |
| Level 2 | <p>Incase customer do not receive a response within 7 working days they may contact the grievance Cell</p> <p>Contact number: - 84899 31973</p> <p>Between 9.30 am to 6.00 pm (except on 3rd Saturday, Sunday and bank holidays)</p> <p>Email Us  grievance.cell@dvarakgfs.com</p> |
| Level 3 | <p>Incase customer do not receive a response within 7 days they may contact the Grievance Redressal Officer</p> <p>Contact number: - 7305091235</p> <p>Between 9.30 am to 6.00 pm (except on 3rd Saturday, Sunday and bank holidays)</p> <p>Email Us  nodal_officer@dvarakgfs.com</p> <p>-</p> <p>Write to Grievance redressal officer Dvara KGFS ,10th Floor, IIT-Madras Research Park, Kanagam Village, Taramani, Chennai 600113,</p> |

Sandwich boards have been displayed at branches which contain telephone numbers of the Grievance Redressal Officer and the RBI Ombudsman. Customers are encouraged to call these numbers, if required, in the case of any escalations.

TAT for closure of complaints and Action Required

1. Independent of the mode of receipt of the complaints, each of them will have to be attended to within 24 hours of receipt. The Zonal Head is apprised about each of the complaints. Any action that needs to be taken on staff, will be done in coordination with the KGFS HR Team.
2. General TAT for closure of complaints are 7 working days for normal complaints and for Insurance and NPS related it is 15 working days, from the date of receipt of all the information required for

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closure of the compliant.

3. In the event that the grievance remains unresolved for more than a week, then the helpdesk escalates it to Zonal Heads, and the Central Operations with CBO in the loop
4. The Grievances Redressal Officer or such other officer nominated by the Board) is responsible for resolving the grievances and will initiate appropriate action as deemed fit.
5. Any action initiated will be communicated to the helpdesk and documented.
6. In cases, where investigation is required, it will be handled by Head – Operations and handled in accordance with the Disciplinary Action procedure.
7. If the grievance requires any legal intervention, then it will be acted upon accordingly.

VII EMPLOYEE RESPONSIBILITIES

1. It is the responsibility of every branch employee to keep the customers informed of the Grievance redressal mechanism and keep them updated of the changes in the system.
2. It is the responsibility of every manager to be proactive in ensuring that all reasonable measures are taken to address situations before they become grievances and to uncover concerns.
3. Every employee is responsible for using the Grievance handling system in good faith and with the intention of supporting and protecting the interest of the customers.
4. In the event that a grievance is raised, any employee of Dvara KGFS may be asked to participate in the resolution of that concern. Each employee is responsible to cooperate fully with the process.

VIII GRIEVANCE RESOLUTION

Branches shall contact the customers and get the complaints resolved. KGFS Operations Head shall confirm back to KGFS Direct on the resolution and KGFS Direct will call the customer back and convey the same. The complaint is marked as closed after the call from KGFS Direct to the client.

While resolving -

- A customer gets a better understanding of the situation as the concerns are addressed
- It is ensured that a mutually acceptable resolution is achieved through conciliation or mediation, wherever required.
- After the confirmation from the branches about addressal of the complaints, the KGFS Direct team calls the customers to confirm their satisfaction of the resolution, after which only the complaints are closed.

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IX DOCUMENTATION

Head KGFS Direct is responsible for maintaining the records of the grievances received under the policy. The record should contain the details of the grievances raised along with the complete information on the complainant, alleged person, enquiry findings and action taken. All communications pertaining to these grievances will be documented. Helpdesk must also record the results of every investigation and related action for a minimum period of seven years.

X AUDIT

Grievance handling shall form part of HQ Operations/ and Central Operations and the Internal Audit Team shall monitor adherence to the provisions listed under this policy. Internal Auditors/ External Auditors as appointed for the purpose of HQ Operations/ Process Audit has every right to review the Grievance records being maintained by Helpdesk and can also get in touch with Customers (if required) to understand the resolution provided. Customer interaction shall happen in the presence of Branch Manager (or as decided by the Auditor).

XI IMPLEMENTATION

For each KGFS, the Operations Head shall be the central point of contact for the KGFS Direct to send the list of complaints. There will be an identified Official along with details like name, contact details (telephone/mobile no./e-mail address) who can be approached by the Customer for resolution of complaints against the Company. In addition, if the complaint/ dispute is not redressed within a period of one month, the customer may appeal to the Officer-in-charge of the Regional Office of DNBS of RBI (with contact details), under whose jurisdiction, the registered office of the NBFC falls.

XII REVIEW OF CUSTOMER GRIEVANCES

KGFS Direct will provide monthly MIS to Management on Status of Customer Grievances Open and Closed, TAT monitoring, Nature/ Category of Complaints, Root cause analysis of complaints and other reports as required by Management/ applicable statutory guidelines.

The Central Operations Team shall review the complaints and prepare a Root Cause Analysis statement and a detailed review of the quality of the resolution of the complaints. This is presented to the CEO on a monthly basis by the Central Operations Team.

The same will be reviewed and also presented by the Audit Team to the Audit Committee / Customer Oversight and Conduct Committee on a Quarterly basis.