

GRIEVANCE REDRESSAL MECHANISM

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Amendment History

Sr. No.	Particulars of changes made	Effective date	Approved by
1	Change in name of Grievance Redressal Officer, Nodal Officer and Contact Person under Level 4 of the Escalation Matrix	01.09.2025	Board of Directors

GRIEVANCE REDRESSAL MECHANISM

Introduction:

IREP Credit Capital Private Limited (the Company/IREP CC/IREP) is a non-deposit taking Non-Banking Financial Company (NBFC) registered with the Reserve Bank of India (RBI) and is engaged in the business of providing financial assistance. As per extant guidelines of RBI, all NBFCs should ensure that a suitable mechanism exists for receiving and addressing complaints from its customers / constituents with specific emphasis on resolving such complaints fairly and expeditiously regardless of source of the complaints.

The Company is inter alia engaged in the business of providing financial assistance to various small and medium enterprises in the form of facilitating access to various loan products from time to time. In order to address the customer grievances while servicing the customers, the Company formulates the suitable mechanism to address such requirements.

Objective:

The Grievance Redressal Mechanism is framed to provide best customer services and to comply with the Guidelines of Fair Practices Code prescribed by the Reserve Bank of India and the Fair Practices Code of the Company which inter-alia set out broad parameters for dealing with customers.

Brief description of the Policy:

The policy framework lays down requirements related to aspects of principal of grievances redressal, registration of complaints, escalation of complaints, resolution of complaints, periodic review of records.

Regulatory Requirements:

The Reserve Bank vide its Scale Based Regulations and other applicable guidelines as amended from time to time, has instructed that the Fair Practices Code (FPC) is to be adopted by all NBFCs while doing lending business and to formulate the Customer Grievance Redressal Policy as duly approved by the Board and have it displayed with details relating to Grievance Redressal Officer at their branches / places where business is transacted.

Risk type:

The policy intends to manage/mitigate Legal, Compliance and Operational Risk.

Grievance Assessment:

The policy stipulates the requirements related to registration of complaints, escalation of complaints, resolution of complaints and periodic review to grievances redressal.

Any customer having grievance / complaint / feedback with respect to the product and service offered by IREP CC may write to the Company' Customer Service Department in the following manner:

I. Filing a Complaint:

- a. Branch: Customers with a grievance can visit the branch office and provide a written complaint if the said borrower is not having an email, the Branch personnel to help the borrower to raise a ticket on our system and share the same with the Customer Service team. If the borrower has an email id, to inform the borrower to email his complaint to customer.services@irepglobal.com.
- b. Email : Customers can send their grievance through email at : customer.services@irepglobal.com

- c. Letters: Customer can write to: IREP Credit Capital Private Limited
Address: 1-8-382, 5th Floor, Queen's Plaza, SP Road, Begum Pet, Secunderabad -500003, Telangana
- d. Phone: Customers can call on Toll Free number: [1800 2686 444](tel:18002686444)

For proper resolution, Customer is requested to mention the Loan application number or Loan Account number while filing the complaint. • Anonymous complaints will not be addressed.

II. Resolution Process:

- On receipt of complaint, an automated acknowledgement of the same is being sent to the complainant. All the complaints received shall be recorded.
 - The Customer Service Executive shall ensure that the grievance / complaint / feedback will be segregated into grievance / complaint / feedback and ensure that all complaints are resolved through the team in a timely and effective manner, and status of resolution / closure of complaints in records is updated and closed in 7 days from the date of the receipt of the complaint.
 - The Customer Service Executive to share a weekly MIS with the Product Team for the grievance / complaint / feedback received and the current status for the same.
 - For any grievance of serious concern shall be immediately reported with the CEO, Dy CEO, Risk Head and the Compliance Officer and the resolution shall be obtained in consultation with the above mentioned officers.
 - The said grievance / complaint / feedback shall be sent to the respective teams:
1. For Legal/Compliance/FPC/KYC: Product Head and with CC to grievanceredressal@irepglobal.com
 2. For Sales: to RSM and CC to State Head – Sales and CC to grievanceredressal@irepglobal.com
 3. For Collection: to add the names with RCM and with CC to Zonal Head, grievanceredressal@irepglobal.com
 4. For handover of loan closure documents: Operation Head and CC to grievanceredressal@irepglobal.com
 5. For Accounts of borrower: Accounts at Hyderabad office and CC to grievanceredressal@irepglobal.com
- The Customer Service Executive shall monitor the complaints status to ensure that the complaints are resolved and are responded to the Customer through the respective mode of communication.
 - If in any case, the Customer Service Executive needs additional time, the Customer Service Executive shall inform the customer, the reasons for delay in resolution for the timelines specified above and provide the expected timelines for resolution of the complaint.

III. Escalation Matrix:

Escalation Matrix			
Levels	Contact Person/ Team	Mode through which the customer may connect	TAT to resolve the grievance
Level 1	Branch Manager	<u>Branch</u> : Customers with a grievance can visit the branch office and provide a written complaint. If the said borrower does not have an email id, the Branch personnel to help the borrower to raise a ticket on our system and share the same with the Customer Service team. If the borrower has an email id, the Branch personnel to inform the borrower to email his complaint to customer.services@irepglobal.com	Within 7 working days from the date of receipt of customer disputes.

Level 2	Grievance Redressal Officer (GRO)	If a customer is not satisfied with the resolution provided by the Branch / Customer Service Executive in 7 days, the customer can escalate the issue to: Grievance Redressal Officer: Mr. Ravi Kumar Kandula through any of the following modes: a) <u>Email</u>: Customers can send their grievance through email at : grievanceredressal@irepglobal.com b) <u>Letters</u>: Customer can write to: Grievance Redressal Officer, IREP Credit Capital Private Limited Address: 1-8-382, 5th Floor, Queen's Plaza, S.P. Road, Begum Pet, Secunderabad -500003, Telangana. c) <u>Phone</u>: Customers can call on Toll Free number: 1800 2686 444	Within 7 working days from the date of escalation of grievance with the Grievance Redressal Officer
Level 3	Principal Nodal Officer	If a customer is not satisfied with the resolution provided by the Grievance Redressal Officer in 7 days, the customer can escalate the issue to: The Principal Nodal Officer: Ms. Suravi Garnaik Address: IREP Credit Capital Private Limited, 1-8-382, 5th Floor, Queen's Plaza, S.P. Road, Begum Pet, Secunderabad -500003, Telangana Phone No: 04041923088 Email id: nodalofficer@irepglobal.com	Within 7 working days from the date of escalation of grievance with Nodal Officer.
Level 4	COO: Mr. Bhavesh Patel	If a customer is not satisfied with the resolution provided by the Principal Nodal Officer in 7 days, the customer can escalate the issue to: Chief Operating Officer: Mr. Bhavesh Patel Address: IREP Credit Capital Private Limited, 22nd Floor S B Road, Dadar West, Mumbai 400013 Maharashtra Phone No: +9122 40150006 Email id: escalation@irepglobal.com	Within 30 days of date of receipt of complaint.

Level 5	RBI Ombudsmen (RBIOs)	If the Company does not respond within a period of 30 days after lodgment of the complaint or rejects the complaint wholly/partly or if the complainant is not satisfied with the response/resolution given by the Company, the complainant can lodge the complaint under The Reserve Bank - Integrated Ombudsman Scheme, 2021 (RB-IOS, 2021). The complaint should be made to the RBI Ombudsman not later than one year after receiving the reply of the Company or, in cases where no reply is received, not later than one year and 30 days after the date of the representation to the Company. A complaint can be filed through any of the following methods: i. Online - on CMS portal of RBI at https://cms.rbi.org.in. ii. Physical complaint (letter/post) in the form as specified in Annexure 'A' in the RB-IOS, 2021 to "Centralised Receipt and Processing Centre, 4th Floor, Reserve Bank of India, Sector -17, Central Vista, Chandigarh - 160017". iii. Complaints with full details can be sent by email to crpc@rbi.org.in. A complainant can reach out to the Contact Center of RBI to get information related to the procedure of or help in filing complaints and to ascertain the status of the complaint lodged with RBI. The contact centre with Interactive Voice Response System (IVRS) Toll Free #14448 available 24x7, while the facility to connect to Contact Centre personnel is available from 8:00 AM to 10:00 PM (Monday through Saturday, except National Holidays) for English and Hindi, and ten Regional Languages (Assamese, Bengali, Gujarati, Kannada, Marathi, Malayalam, Odia, Punjabi, Telugu and Tamil). For more details, please refer The Reserve Bank - Integrated Ombudsman Scheme, 2021 (RB-IOS, 2021) available on https://rbi.org.in/commonperson/english/Scripts/FAQs.aspx	-
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- Any person aggrieved by an Award issued by the RBI Ombudsman or rejection of a complaint under an appealable clause, i.e. Sub-clauses (c) to (f) of Clause 16(2) of the RB-IOS, 2021, can file an appeal before the Appellate Authority in RBI, within 30 days of the date of receipt of communication of the Award (or acceptance of the award by the complainant) or rejection of the complaint.
- The powers of Appellate Authority are vested with the Executive Director-in-charge of Department of RBI implementing the Scheme. The address of the Appellate Authority is:

The Appellate Authority
Reserve Bank - Integrated Ombudsman Scheme, 2021
Consumer Education and Protection Department
Reserve Bank of India
First Floor, Amar Building, Fort, Mumbai 400 001.

- An appeal can be filed through the CMS Portal (<https://cms.rbi.org.in>) for a closed complaint. Alternatively, the appeal can also be sent vide e-mail at aaos@rbi.org.in.
- Further, if the complainant is not satisfied with the resolution provided by the Ombudsman, he/she is at liberty to explore other recourses and/or remedies available, as per law.
- The name and contact details of the Grievance Redressal Officer / Principal Nodal Officer, along with the contact details of the Ombudsman have been displayed at our branches and is hosted on the Company's website.
- Responsibilities of Grievance Redressal Team
 - The grievance redressal team is responsible for the resolution of a grievance to the utmost satisfaction of the customers. They are also responsible to send an acknowledgement for the grievance with tentative timelines for resolution.
 - If in case the grievance has not been resolved, the team is required to make the customers aware of the alternative avenues available to escalate the grievance.
 - In any case where the branch manager is unable to address a grievance, he may refer the case as per the escalation matrix.

IV. DISPLAY OF INFORMATION: The Company shall, at all places from where it conducts business prominently display the details of the Grievance Redressal Mechanism as well as the details of the Regional Office of the Reserve Bank of India under whose jurisdiction the Company is registered. Relevant extract of Grievance Redressal Mechanism for display at branches is enclosed as Annexure-1

V. ANY Compliant which is received by RBI will be shared by the Nodal Officer with the Customer Service Executive for update and closure. Once closed, the said complaint will be replied to RBI by the Nodal Officer.

VI. Review and monitoring - Periodic review of monitoring of complaints, TATs, nature of complaints is done to ensure that process loopholes, if any are plugged and trends are checked.

The Customer Service Officer shall ensure effective monitoring of the complaints and their resolution and undertake necessary amendments to the Grievance Redressal Mechanism to make the process more efficient. The ~~Nodal officer~~ Product Head shall ensure periodic review of the Grievance Redressal Mechanism to ensure efficient and effective functioning of the same.

REVIEW OF GRIEVANCE REDRESSAL POLICY: This Grievance Redressal Policy of the Company will be reviewed by the Board on recommendation of Grievance Redressal Officer on an annual basis for necessary changes required for enhancing the transparency and ethical standing of the organization and also to consider and adopt relevant regulatory amendments.

Annexure 1

RESERVE BANK - INTEGRATED OMBUDSMAN SCHEME, 2021

The Scheme integrates the existing three Ombudsman schemes of RBI namely, (i) [the Banking Ombudsman Scheme, 2006](#); (ii) [the Ombudsman Scheme for Non-Banking Financial Companies, 2018](#); and (iii) [the Ombudsman Scheme for Digital Transactions, 2019](#). Salient Features of the Scheme:

- i. It will no longer be necessary for a complainant to identify under which scheme he/she should file complaint with the Ombudsman.
- ii. The Scheme defines 'deficiency in service' as the ground for filing a complaint, with a specified list of exclusions. Therefore, the complaints would no longer be rejected simply on account of "not covered under the grounds listed in the scheme".
- iii. The Scheme has done away with the jurisdiction of each ombudsman office.
- iv. A Centralised Receipt and Processing Centre has been set up at RBI for receipt and initial processing of physical and email complaints in any language.

Grounds of Complaint:

Any customer aggrieved by an act or omission of a Regulated Entity resulting in deficiency in service may file a complaint under the Scheme personally or through an authorised representative as defined under clause 3(1)(c) of the scheme i.e. a person, other than an advocate, duly appointed and authorised in writing to represent the complainant in the proceedings before the Ombudsman; Grounds for non-maintainability of a Complaint

- (1) No complaint for deficiency in service shall lie under the Scheme in matters involving: (a) commercial judgment/decision of a Regulated Entity; (b) a dispute between a vendor and a Regulated Entity relating to an outsourcing contract; (c) a grievance not addressed to the Ombudsman directly; (d) general grievances against Management or Executives of a Regulated Entity; (e) a dispute in which action is initiated by a Regulated Entity in compliance with the orders of a statutory or law enforcing authority; (f) a service not within the regulatory purview of the Reserve Bank; (g) a dispute between Regulated Entities; (h) a dispute involving the employee-employer relationship of a Regulated Entity; (i) a dispute for which a remedy has been provided in Section 18 of the Credit Information Companies (Regulation) Act, 2005; and (j) a dispute pertaining to customers of Regulated Entity not included under the Scheme.
- (2) A complaint under the Scheme shall not lie unless: (a) the complainant had, before making a complaint under the Scheme, made a written complaint to the Regulated Entity concerned and –
 - (i) the complaint was rejected wholly or partly by the Regulated Entity, and the complainant is not satisfied with the reply; or the complainant had not received any reply within 30 days after the Regulated Entity received the complaint; and (ii) the complaint is made to the Ombudsman within one year after the complainant has received the reply from the Regulated Entity to the complaint or, where no reply is received, within one year and 30 days from the date of the complaint. (b) the complaint is not in respect of the same cause of action which is already- (i) pending before an Ombudsman or settled or dealt with on merits, by an Ombudsman, whether or not received from the same complainant or along with one or more complainants, or one or more of the parties concerned; (ii) pending before any Court, Tribunal or Arbitrator or any other Forum or Authority; or, settled or dealt with on merits, by any Court, Tribunal or Arbitrator or any other Forum or Authority, whether or not received from the same complainant or along with one or more of the complainants/parties concerned; (c) the complaint is not abusive or frivolous or vexatious in nature; (d) the complaint to the Regulated Entity was made before the expiry of the period of limitation prescribed under the Limitation Act, 1963, for such claims; (e) the complainant provides complete information as specified in clause 11 of the Scheme; (f) the complaint is lodged

by the complainant personally or through an authorised representative other than an advocate unless the advocate is the aggrieved person.

Explanation 1: For the purposes of sub-clause (2)(a), 'written complaint' shall include complaints made through other modes where proof of having made a complaint can be produced by the complainant. Explanation 2: For the purposes of sub-clause (2)(b)(ii), a complaint in respect of the same cause of action does not include criminal proceedings pending or decided before a Court or Tribunal or any police investigation initiated in a criminal offence.

Annexure 'A'
FORM OF COMPLAINT (TO BE LODGED) WITH THE OMBUDSMAN (TO BE FILLED UP BY THE COMPLAINANT)

To:

The Ombudsman

Madam/Sir,

Sub: Complaint against(place of Regulated Entity's branch or office) of
(name of the Regulated Entity)

Details of the complaint:

1. Name of the Complainant
2. Age (years).....
3. Gender.....
4. Full Address of the Complainant

.....

..... Pin Code

Phone No. (if available).

Mobile No.

Email (if available)

5. Complaint against (Name and full Address of the branch or office of the Regulated Entity)

.....

Pin Code

6. Nature of relationship / account number (if any) with the Regulated Entity

.....

7. Transaction date and details, if available

(a) Date of complaint already made by the complainant to the Regulated Entity (Please enclose a copy of the complaint)

.....

(b) Whether any reminder was sent by the complainant? Yes/No

(Please enclose a copy of the reminder)

.....

8. Please tick the relevant box (Yes/No)

Whether your complaint:

(i)	is sub-judice/under arbitration?	Yes	No
	is made through an advocate, except when the advocate is the aggrieved party?		
	has already been dealt with or is under process on the same ground with the Ombudsman?		
	is in the nature of general complaint/s against Management or Executives of a Regulated Entity?		
	is on account of a dispute between Regulated Entities?		
	involves employer-employee relationship?		

9. Subject matter of the complaint

10. Details of the complaint: (If space is not sufficient, please enclose a separate sheet)

.....

11. Whether any reply has been received from the Regulated Entity within a period of 30 days of receipt of the complaint by it?
 Yes/No (if yes, please enclose a copy of the reply)

12. Relief sought from the Ombudsman
 (Please enclose a copy of documentary
 proof, if any, in support of your claim)

13. Nature and extent of monetary loss, if any, claimed by the complainant by way of compensation (please refer to clauses 15
 (4) & 15 (5) of the Scheme) Rs.....

14. List of documents enclosed:

Declaration:

(i) I/We, the complainant/s herein declare that:

a) the information furnished above is true and correct; and

b) I/We have not concealed or misrepresented any fact stated above, and in the documents submitted herewith.

(ii) The complaint is filed before the expiry of a period of one year reckoned in accordance with the provisions of clause 10 (2) of the Scheme.

Yours faithfully (Signature of the Complainant/Authorised Representative)

AUTHORISATION

If the complainant wants to authorise a representative to appear and make submission on her/his behalf before the Ombudsman, the following declaration should be submitted:

I/We hereby nominate Shri/Smt..... as my/our authorised representative whose contact details are as below:

Full Address

.....
.....
.....

Pin Code

Phone No:.....

Mobile Number.

E-mail

(Signature of the Complainant)