

Arohan Financial Services Limited

CUSTOMER GRIEVANCE REDRESSAL POLICY

Version 2.0



Prepared by : Central Operation and Legal & Compliance

Approved by : The Board of the Company

Date of Approval : June 20

This document remains the property of Arohan Financial Services Limited. This policy is intended to guide the Customer Care Department within the Company and outside the Company. It is not to be used for any other purposes, copied, distributed or transmitted in any form or means or carried outside the Company premises without the prior written consent of the Company.

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This policy on Grievance Redressal of Arohan Financial Services Limited. (“Arohan/the Company”), is set out as a mechanism available within the organization to enable the customers of Arohan to lodge their complaints / grievances or give their feedback / suggestions to Arohan in relation to their dealings with Arohan including financial assistance, if any, being considered for them and for addressing the same in a time bound manner, by following the provisions as provided herein (the Grievance Redressal Policy). Further this policy is being prepared in terms of Master Direction - Non-Banking Financial Company - Systemically Important Non-Deposit taking Company and Deposit taking Company (Reserve Bank) Directions, 2016 (“Direction”) and amended thereof.

1. Definitions

- 1.1. “Board” shall mean the Board of Directors of Arohan from time to time.
- 1.2. “Customers”, means all individual, Partnership Firm, LLP and Company, who may avail financial and other facilities from Arohan, as per the extant policies of Arohan.
- 1.3. “Product” means the financial facilities provided by Arohan to its customers.
- 1.4. “Working Day” shall mean any day which is not a Sunday, a bank holiday or a public holiday in Kolkata and Mumbai, further working day does includes second and fourth Saturday of every month .
- 1.5. “GRO” shall means Grievance Redressal Officer.

2. Scope of the Policy

- i. Customer Centricity is one of the six pillars of Arohan’s Value system. Arohan’s products and processes are designed to cater to the needs of its customers spanning the rural, semi urban and urban belt of the ecosystem. Arohan has developed the Customer Grievance Redressal mechanism to resolve its customer’s grievances on priority basis.
- ii. This policy document aims at resolving customer complaints and grievances through proper service delivery and review mechanism and also to ensure prompt redressal of customer complaints and grievances, if there are any.
- iii. The key principles of Arohan’s grievance redressal policy are as under:
 - a) Customers shall be treated fairly at all times.
 - b) Complaints raised by customers are dealt with courtesy and without undue delay.

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- c) To define escalation levels in case customer’s complaint was not addressed at all or was not addressed satisfactorily, the escalation matrix is given in “Annexure A” of this policy.
- d) 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.

3. How the Customers can file the complaints

Customer can lodge his / her grievance pertaining to deviation from standard norms and practices,behaviour of staff, products and services and non-adherence to Fair Practices Code, through any of the following channels. A customer may lodge a complaint on phone, in writing or through electronic means, if he/she is not satisfied with the services provided by Arohan. The Customer can also call through help line numbers to register his/her complaint or he/she may further escalate concern as per matrix given in Annexure A - Customer Escalation Matrix. Whenever a complaint call or mail is received, sender receives a response back within 3 working days acknowledging his/her complaint.

A. Through letter

Customer also has an option of writing a letter addressed to the GRO as per details given below;

To

The Grievance Redressal Officer (Ms. Indira Ghosh)

Arohan Financial Services Limited

PTI Building, 4th Floor, DP Block, DP-9, Sector-V,

Salt Lake, Kolkata – 700091, West Bengal

B. Through E-mails

Customers can also submit their grievances through email at customercare@arohan.in by giving full disclosures of Loan account details and details of the complainant and giving specific instances of the cause of complaint. Complaints received by e-mail shall be acknowledged by e-mail.

C. Complaints through call centre

Customer can register his/her complaint on toll free number **(1800 -103 2375 from Monday to Friday (10 am to 6 pm)** which offers multilingual (Bengali, Hindi, Oriya and Assamese) customer insight team. A cloud based Customer Relationship Management (CRM) system has been introduced to enhance the customer experience and provide “ON TIME SOLUTION” . The customer

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insight team is responsible for handling the queries, complaints of the customers and provide solution to the customer as per the agreed mechanism and procedure.

D. Complaints received by GRO

Customer can register his/her complaint on toll free number, if any complaint reported to the branch/ Customer care has not been resolved within a period of 7 days from the date of lodging the complaint with the Company or if the customer is not satisfied with the resolution provided for complaint made by him/her. Customers may also approach Arohan GRO at through call to his/her contact number as given below. The telephone numbers, complete address and email address etc. will be prominently displayed on the Arohan website/branches/offices for ease of contact by the customers of Arohan.

Name: Indira Ghosh

Contact details of GRO: 033-4042-7726

E. Complaints received through MFIN (Micro Finance Institution Network)

Customer can register his complaint on toll free number with MFIN, if any complaint reported to the Company has not been resolved within a period of 15 days from the date of lodging the complaint with the Company or if the customer is not satisfied with the resolution provided for complaint made by him/her.

F. Complaints received through RBI DNBS/ NBFC Ombudsman

Customer can register his complaint with the Officer-in-Charge of the Regional Office of DNBS (Department of Non-Banking Supervision) of RBI if any complaint reported to the Company has not been resolved within a period of one month from the date of lodging the complaint with the Company or if the customer is not satisfied with the resolution provided for complaint made by him/her. The Customer can also approach the office of Non-banking Ombudsman set up by RBI for redressal. The contact details are displayed at each branch and also in this policy.

Any customer who has a grievance against the Company on any one or more of the grounds mentioned in Clause 8 of the Ombudsman Scheme for NBFCs issued by RBI on February 23rd, 2018 (for details visit <https://rbidocs.rbi.org.in/rdocs/Content/PDFs/NBFC23022018.pdf>), may himself/herself or through his authorized representative, make a complaint to the Ombudsman within whose jurisdiction the Branch/ Registered Office of the Company falls. The address and

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area of operation of Ombudsman is annexed to the policy as Annexure – B and displayed at each branch.

4. Closer Process of any complaint

Customer Insight receives the complaint from above mentioned channels, upon receipt of the complaint and required document, the customer insight executive registers the complaint and speaks to all the relevant stakeholders as well as checks in the LMS system to validate the query/complaint raised by the complainant. If the executive find the complaint genuine, the complainant receives the complaint no within the 3 working hour from the time of raising the complaint with the executive. The executive share the entire details with voice recording of the complaint call to the Direct Responsible Individual (DRI) as per the Grievance Redressal Mechanism (GRM). Within the stipulated TAT, the DRI need to respond to the Customer Insight executive or else the same will be escalated to Level 1. Within the stipulated TAT, the DRI in discussion with Level 1 need to respond to the Customer Insight executive or else the same will be escalated to Level 2. The Level 2 or final escalation need to resolve the case with the stipulated TAT.

Basis of the response, the customer insight team calls the complainant and confirm that the complaint has been resolved. Thereafter, the complaint is been closed in our system. A sms confirmation with the detail of complaint no are being sent to the customer during raising of complaint and closing of complaint.

5. Outbound calls to the Customers

Arohan’s Customer Care cell will make outbound calls as per a pre-fixed schedule. The outbound calls will be made with one or more of the following objectives:

- Do a sample check to verify the extent of adherence to policies and process esp. with regards to customer protection, for both credit and non-credit products
- Test specific issues that may arise from time to time. For instance, if cases of rude staff behaviour are being reported from a certain area, randomised calls will be made to customers to test its veracity. In all these calls, certain generic inquiries around customer satisfaction and staff behaviour are also made.

Arohan will commission monthly Loan Verification, Customer Satisfaction, Dropout, Overdue Cross Sell and other Need based surveys by their Customer Insight team. All these surveys will

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consist of a brief survey questionnaire around feedback on products, processes, service quality, and staff behaviour.

6. Customer Grievances Committee

There is a specific Customer Grievance Committee, the Committee has been formed with the participation of each related departments such as Human Resource, Information technology, Finance, Risk, Audit, Compliance & Legal, Quality, Business and Operation chaired by Head of Quality. The Committee periodically reviews major areas of customer grievances and measures taken to improve customer service. The Committee would also consider unresolved complaints/grievances and may offer its advice.

7. Grievance Redressal Officer

Grievance Redressal Officer (Ms. Indira Ghosh)
 Arohan Financial Services Limited
 PTI Building, 4th Floor,
 DP Block, DP-9, Salt Lake City
 Kolkata- 700091
 Phone: 033-4042-7726

Mobile: 9903019085
 E-mail: indira.ghosh@arohan.in

8. Nodal Officer for the purpose of Grievances as per Ombudsman Scheme

Aggrieved customers can write directly to the Principal Nodal Officer regarding their grievances at the following address:

Principal Nodal Officer (Mr. Dinesh Mourya)
 Arohan Financial Services Limited
 PTI Building, 4th Floor,
 DP Block, DP-9, Salt Lake City
 Kolkata- 700091
 Phone: 033- 40156040
 Mobile: 9883733233
 E-mail: dinesh.mourya@arohan.in, compliance@arohan.in

9. Mandatory display at the offices

At the operational level, Arohan shall ensure to display the following information prominently, for the benefit of its customers, at its places of business:

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- a) the name and contact details (Telephone / Mobile nos. / email address) of the Grievance Redressal Officer who can be approached by the customer for resolution of complaints against Arohan.
- b) To display the MFIN toll free Number at its offices/branches
- c) Salient features of Ombudsman Scheme and the name and contact details of the Ombudsman, who can be approached by the customer
- d) Arohan displays the call centre number and the details of escalation matrix prominently (in the vernacular) for the benefit of their customers, at all of its branches. The notice serves the purpose of highlighting to the customers, the grievance redressal mechanism followed by the Company, together with details of the grievance redressal officer and of the Regional Office of the RBI.

10. Reporting to Board of Directors

Summary of the customer grievance reports along with actions initiated would be reported to the Board on each quarterly meeting. The report shall contain information like, the total no. of complaints received, disposed off and pending, with reasons thereof, which will be placed before the Board for information / guidance.

11. Adoption and Review

The Grievance Redressal Policy of Arohan is approved by the Board and will be reviewed at least annually by the Board. The Customer Grievance Committee is also authorized to review and make non-material amendments in this policy. A note on all these changes should be submitted to Board annually for their reference.

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Annexure - A

Customer Escalation Matrix

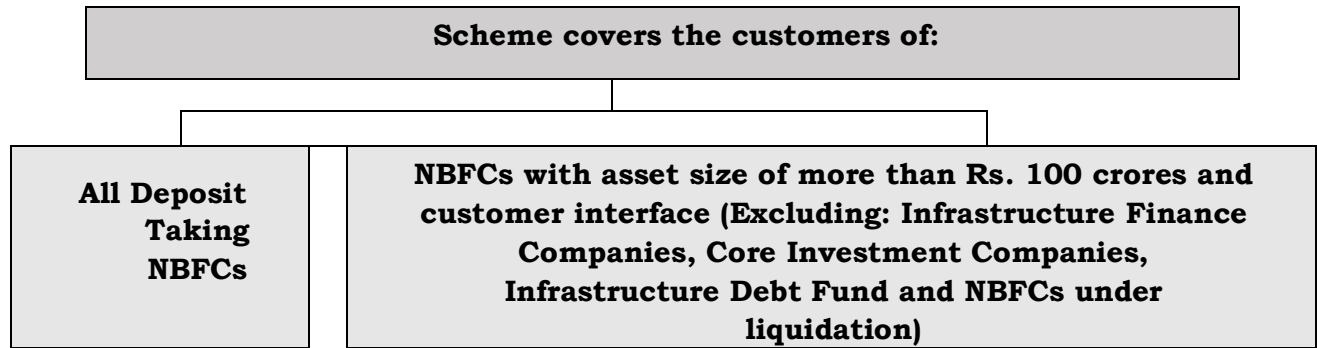
If the complaint routed through any of these given channels and is not resolved and the customer is not satisfied, then the matter can be escalated as per the escalation matrix shown below:-

Level	Time lapse since 1 st complaint	Contact person's Name/Designation	Contact Details
1	3 days	Customer Service Representative/ Branch Head	Printed on the Loan Card Branch office and premise
2	3 days	Customer Care Help Desk	Tollfree: 1800-103-2375 Email: customercare@arohan.in
3	7 days	Grievance Redressal Officer (GRO) Indira Ghosh Asst.Manager, Arohan	Tel: 0334042-7726 Email: indira.ghosh@arohan.in Address: PTI Building, 4 th Floor, DP-9, DP Block, Sector-5, Salt Lake, Kolkata - 700091
4	15 days	MFIN Toll Free Number	MFIN Toll free: 1800 270 0317
5	30 days	Reserve Bank of India (RBI) Officer-in-Charge, Regional Office, Department of Non-Banking Supervision	Phone No-033-2231-2954 Email: dnbskolkata@rbi.org.in 5 th Floor, 15 N. S. Road, Kolkata 700001

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Annexure – B

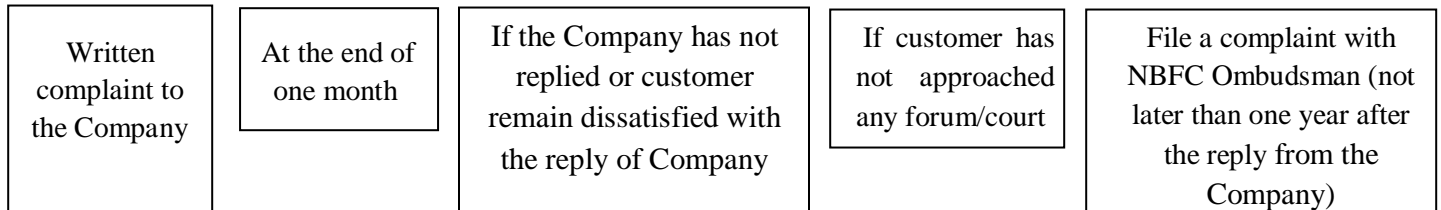
Ombudsman Scheme for Non-Banking Financial Companies, 2018:
Salient Features



Grounds for filing a complaint by a customer:

- Interest/Deposit not paid OR paid with delay;
- Cheque not presented OR done with delay;
- Not conveyed the amount of loan sanctioned, terms & conditions, annualized rate of interest, etc.;
- Failure/refusal to provide sanction letter in vernacular language;
- Notice not provided for changes in agreement, levy of charges;
- Failure to ensure transparency in contract/loan agreement;
- Failure/ Delay in releasing securities/ documents;
- Failure to provide legally enforceable built-in repossession in contract/ loan agreement;
- RBI directives not followed by NBFC;
- Guidelines on Fair Practices Code not followed.

How can a customer file complaint?



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How does Ombudsman take decision?

- Proceedings before Ombudsman are in the nature of Alternate Dispute Resolution mechanism.
- Ombudsman promotes the settlement of the complaint by mutual agreement between the complainant and the Company through conciliation or mediation.
- If not, pass an Award either allowing or rejecting the complaint along with reasons for passing such Award.

Can a customer file appeal, if not satisfied with decision of Ombudsman?

Yes, Ombudsman’s decision is appealable ⇨ Appellate Authority: **Deputy Governor, RBI**

Note:

- This is an Alternate Dispute Resolution mechanism
- Customer is at liberty to approach any other court/forum/authority for the redressal at any stage

Refer to www.rbi.org.in for further details of the Scheme

Address and Area of Operation of NBFC Ombudsman

SN	Centre	Centre Address of the Office of NBFC Ombudsman	Area of Operation
1.	Chennai	C/o Reserve Bank of India Fort Glacis, Chennai 600 001 STD Code: 044 Tel. No. 25395964 Fax No. 25395488	Tamil Nadu, Andaman and Nicobar Islands, Karnataka, Andhra Pradesh, Telangana, Kerala, Union Territory of Lakshadweep and Union Territory of Puducherry
2.	Mumbai	C/o Reserve Bank of India, RBI Byculla Office Building, Opp. Mumbai Central Railway Station, Byculla, Mumbai-400 008	Maharashtra, Goa, Gujarat, Madhya Pradesh, Chhattisgarh, Union Territories of Dadra and Nagar Haveli, Daman and Diu
3.	New Delhi	C/o Reserve Bank of India Sansad Marg, New Delhi - 110001 STD Code: 011 Tel. No. 23724856 Fax No. 23725218-19	Delhi, Uttar Pradesh, Uttarakhand, Haryana, Punjab, Union Territory of Chandigarh Himachal Pradesh, and Rajasthan and State of Jammu and Kashmir
4.	Kolkata	C/o Reserve Bank of India 15, Netaji Subhash Road, Kolkata-700001 STD Code: 033 Tel. No. 22304982 Fax No. 22305899	West Bengal, Sikkim, Odisha, Assam, Arunachal Pradesh, Manipur, Meghalaya, Mizoram, Nagaland, Tripura, Bihar and Jharkhand

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