

KEERTANA FINSERV PRIVATE LIMITED

Name of Policy	Grievance Redressal Policy
Date of Last Approval/Review	NA
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Approving Authority	Board of Directors
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GRIEVANCE REDRESSAL POLICY

1. Introduction

Keertana Finserv Private Limited (“**Keertana Finserv**” or “**Company**”) is committed to a high standard of corporate behavior which acts as benchmark for the industry. Keertana Finserv also believes in conducting its business in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behavior. The Company also wants to develop a culture where it is safe for all stakeholders to raise concerns about any unacceptable practice or behavior.

Keertana Finserv has formulated a Grievance Redressal Policy (“**Policy**”). The objective of this Policy is to build and strengthen a culture of transparency and trust in the organization and to provide all stakeholders of Keertana Finserv with a framework/procedure for responsible and secure reporting of grievance to the Company’s management.

This Policy does not release Director(s) and employees of the Company from their duty to behave in a manner expected of them which is in line with the Code of Conduct.

2. Applicability

This Policy applies to all Customers of the Company. Further, the Policy will also extend its cover to employees and other stakeholders of Keertana Finserv.

3. Definitions

In this Policy, the following terms, to the extent not inconsistent with the context thereof, shall have the following meanings as assigned to them:

“**Appellate Authority**” means the Deputy Governor-in-Charge of the concerned department of the Reserve Bank responsible for implementing the RBI Ombudsman Scheme or any such authority as prescribed under the RBI Ombudsman Scheme.

“**Applicable Laws**” means all applicable laws, statutes, enactments, acts of central or state legislature, ordinances, rules, regulations, notifications, guidelines, directions, directives, policies, circulars, decisions and any other pronouncements issued in accordance with the Companies Act, the RBI Master Directions or any other law applicable to the jurisdiction of India by any central, state, local, or other governmental, administrative or regulatory authority exercising executive, legislative, judicial, regulatory or administrative functions of or pertaining to the government.

“**Board**” means the board of directors of Keertana Finserv.

“**Companies Act**” means the Companies Act, 2013, and rules and regulations issued thereunder, as amended from time to time.

“**Customer**” means a user of the financial services and products, including lending provided by Keertana Finserv..

“Grievance” means any complaint, dispute, disagreement by a Customer arising as a result of and/or relating to the services and products provided by Keertana Finserv.

“Grievance Redressal Mechanism” is the internal grievance redressal mechanism of Keertana Finserv for addressing and resolving complaints received from the Customers.

“Grievance Redressal Policy” means this grievance redressal policy adopted and implemented by Keertana Finserv, as may be amended from time to time.

“GRO” means the Grievance Redressal Officer.

4. Complainant- Role, Rights and Duties

- 4.1 The complainant’s role is that of a reporting party with genuine grievance.
- 4.2 The complainant has a right to know the status of his/her application and of the final decision taken by the Company.
- 4.3 Complainant will be told that how he/she should make a complaint, to whom he/she should make a complaint, in what manner and in what time his complaint is expected to be resolved.
- 4.4 The Complainant has a duty to provide all necessary information and extend all required support to Grievance Mechanism.

5. The Guiding Principles

To ensure that this Policy is adhered to, and to assure that the concern will be acted upon seriously, Keertana Finserv will:

- 5.1 Have system and a procedure for receiving, registering and disposing of complaints and grievances.
- 5.2 Have appropriate grievance redressal mechanism within the organization to resolve complaints and grievances. Such a mechanism should ensure that all disputes arising out of the decisions of the Company’s functionaries are heard and disposed of at least at the next higher level.
- 5.3 Ensure that the complaints are acted upon in a time bound manner.
- 5.4 Maintain adequate transparency so that the customer can have a better understanding of what he/ she can reasonably expect of the services.

6. Exclusions

The following types of Complaints will ordinarily not be considered and taken up for investigation as per this Policy:

- 6.1 Complaints that are Illegible.
- 6.2 Complaints those are trivial or frivolous in nature.
- 6.3 Matters which are pending before a court/ judicial forum, State, National Human Rights Commission, Tribunal or any other judiciary or sub judiciary body
- 6.4 Any complaint lodged beyond the applicable Limitation Period

7. Principles Governing Grievance Redressal Mechanism

7.1 The principles governing the Grievance Redressal Mechanism are as follows:

- a. to establish a robust Grievance Redressal Mechanism for Keertana Finserv;
- b. to constantly devise newer and smarter mechanisms to receive and redress Grievances;
- c. to guide and enable all employees of Keertana Finserv to work in good faith and without prejudice to the interests of the Customers;
- d. to prioritise redressal of Grievances of Customers with disabilities;
- e. to redress the Customer's Grievances arisen on account of services provided by any outsourced agency;
- f. to deal with all Grievances in a prompt, efficient, timely and courteous manner;
- g. to treat all Customers fairly at all times;
- h. to keep the Customer informed about the mechanism to address their complaints, concerns and grievances within Keertana Finserv; and
- i. to analyze and implement the feedback received from Customers on a continuous basis.

7.2 Redressal of Grievances of a Customer with disabilities will be prioritized once a formal request is made and proof of disability is furnished by such Customer. If any Customer requests for a hard copy of agreement, statements or any other documents, a copy of which has already been provided to the Customer in soft copy, such hard copy may be provided to the Customer by Keertana Finserv after levying, at Keertana Finserv discretion, a charge of a nominal amount.

7.3 A consolidated report of all reviews conducted under the Grievance Redressal mechanism shall be submitted to the Board at such regular intervals, as specified by it or required under Applicable Laws.

8. Team Sensitization on Handling Complaints

The following officers are responsible for handling the grievances of Customers:

Chief Grievance Redressal Officer (CGRO):

- 1. Appointment:** Keertana Finserv shall appoint a CGRO
- 2. Role:** The CGRO has the responsibility to handle grievances of the Customers
- 3.** The CGRO may be assisted by a team comprising of any individuals or employees of Keertana Finserv as determined by Keertana Finserv time to time.

9. Registration of complaints

A Customer can register Grievances in accordance with the process set out in this Grievance Redressal Policy. Keertana Finserv follows a 'three level' process for registering and addressing all Grievances as described below.

<p>Level 1 Branch/ Toll-free number/ E-mail/ WhatsApp/ Website/ Portal</p> <p>A customer may visit branch or call at 1800-572-8888 to register their complaint. The complaint can also be e-mailed at cg@keertana.co. The customer may also submit his/ her grievances on the Company's website www.keertana.co</p>
<p>Level 2 – First Escalation</p> <p>Branch Manager / Call Centre Branch Manager can be contacted at the branch itself while the Call-centre manager can be reached at the call centre number.</p>
<p>Level 3 - Second Escalation</p> <p>Chief Grievance Redressal Officer (GRO)</p> <p>In case the complaint is not resolved, the customer may write to the Chief Grievance Redressal Officer at cgro@keertana.co, or, the customer may also write to him at below mentioned address:</p> <p>The Grievance Redressal Officer, Keertana Finserv Private Limited Plot No. 31 & 32, Ramky Selenium Towers, Tower A, Financial District, Nanakramguda, Hyderabad, Telangana-500032</p>

The customers are requested to follow the above Grievance Redressal Mechanism/ Grievance Grid for complaint resolution. At every level, the Company will provide acknowledgement/ preliminary remarks to the aggrieved customer within maximum time of 7 days and the final response will be provided within maximum six weeks depending on the type of grievance/ request. If more time is required, in the interim, the Company will inform expected timeline to such customer. If the customer is not satisfied with the reply/ resolution provided by the Company at one level or the customer does not receive any response, then he/ she may escalate to the next level.

In case, the customer does not receive any response from the Company within 30 days, or he/ she is not satisfied with the response then he/she may lodge their complaint on RBI CMS portal - <https://cms.rbi.org.in> or reach them on the dedicated e-mail id - crpc@rbi.org.in Or send your complaint form (format available on the website under Ombudsman scheme 2021) to the below mentioned address:

Officer- in-Charge
Reserve Bank of India, RBI
Byculla Office Building, Opp.
Mumbai Central Railway Station,
Byculla, Mumbai – 400 008

10. Customer Service and Grievance Redressal Committee

The Customer Service & Grievance Redressal Committee shall comprise of the following:

1. MD & CEO
2. Chief Financial Officer
3. Chief Compliance Officer
4. Chief Business Officer
5. Chief Grievance Redressal Officer

The Committee shall ensure:

1. To review the customer complaints received and actions thereto
2. To discuss the measures which can be instituted for increasing customer delight
3. Any other matter incidental thereto.

The committee shall meet quarterly.

11. Turn Around time

The Service Request Turn Around Time which should be followed in case of receipt of service request is as below:

S. N.	Category	Turn Around Time (Working Days)
1.	EMI Issues	7 days post receipt of query
2.	Statement of Account/ Foreclosure own funds	21 Days post receipt of the query
3.	Property Paper Dispatch	20 days from loan closure date
4.	Refunds	7 Days from the refund received from Insurer or Refunds request received date
5.	Delay in Loan Disb or Insurance Claim Settlement	7 Days from the date of receipt of query
6.	Issures related to staff	10 Days from the date of receipt of query / complaint

12. Notifications

- Requirement under the policy will be circulated to all the employees of Keertana.
- The details of Grievance Redressal Mechanism shall be shared at the Company's all branches and to be hosted on website.

13. Review of the Grievance Redressal Mechanism and Reporting

- The Board has reviewed, approved and adopted this document as Grievance Redressal Policy of Keertana Finserv.
- This Grievance Redressal Policy will be reviewed by the Board on a periodical basis as may be deemed appropriate by the Board

14. Amendment / Modifications / Review

- There shall be an annual review of the Policy.
- Keertana Finserv with the approval of the Board of Directors, can at any time modify or amend, either the whole or any part of this Policy.
- Statutory changes will be read mutatis mutandis in this Policy document even if not amended.
- Any clause or reference in the Policy document which is contrary to or on violation of statutory or regulatory shall be deemed to be severed from the Policy.

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