

**KEERTANA FINSERV LIMITED**

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| <b>Name of Policy</b>      | Grievance Redressal Policy |
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| <b>Approving Authority</b> | Board of Directors         |
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## GRIEVANCE REDRESSAL POLICY

### 1. Introduction

At Keertana Finserv Limited (“Keertana Finserv” or “the Company”), we are dedicated to delivering exceptional experiences and exemplary service to our clients and stakeholders. We pride ourselves on maintaining the highest standards of corporate behaviour. Our commitment to professionalism, honesty, integrity, and ethical conduct is integral to how we operate.

To foster a culture of transparency and trust, we have established a Grievance Redressal Policy (“Policy”). This Policy aims to create a safe and secure environment where all stakeholders can confidently raise concerns regarding any unacceptable practices or behaviours. It provides a clear framework for responsible reporting and ensures that grievances are addressed effectively by the Company’s management.

While this Policy outlines our approach to handling grievances, it does not absolve our Directors and employees from upholding the expected standards of conduct as outlined in our Code of Conduct.

### 2. Applicability

This Policy applies to all Customers, employees and other stakeholders.

### 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.

**“Principal Nodal Officer”** means the company official who is so designated in line with The Reserve Bank - Integrated Ombudsman Scheme, 2021 for the duties as defined therein.

#### **4. Complainant- Role, Rights and Duties**

- The complainant’s role is that of a reporting party with genuine grievance.
- The complainant has a right to know the status of his/her application and of the final decision taken by the Company.
- 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.
- 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:

- Have system and a procedure for receiving, registering and disposing of complaints and grievances.
- 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.
- Ensure that the complaints are acted upon in a time bound manner.
- 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:

- Complaints that are Illegible.
- Complaints those are trivial or frivolous in nature.
- Matters which are pending before a court/ judicial forum, State, National Human Rights Commission, Tribunal or any other judiciary or sub judiciary body
- 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)/Principal Nodal Officer (PNO):**

1. **Role:** The CGRO/PNO has the responsibility to handle grievances of the Customers
2. The CGRO/PNO 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

If customers of Keertana Finserv have any complaints related to the company, they can register the complaint and get resolution by following the steps outlined below:

1. **Registering a Complaint by Calling the Branch Manager:** Complaints can be lodged by calling the branch number specified in the loan schedule.
2. **Visiting the Branch to Register a Complaint in the Branch Complaints Register:** Complaints can be lodged during working days when branch staff are available in the Branch.
3. **Complaint through Call Center:** Complaints can be lodged by calling the call center at Head Office using the toll-free number. A ticket number will be provided after registering the complaint. Call Center Toll-Free Number: 18008430213.
4. **Complaint through Email:** Complaints can also be lodged by sending an email to [contact@keertana.co](mailto:contact@keertana.co)

## Escalation Procedure for Unresolved Complaints

1. **Reporting to the Chief Grievance Redressal Officer (GRO)/ Principal Nodal Officer:** If the issue remains unresolved or is not satisfactorily resolved within 5 working days, it must be escalated to the Chief Grievance Redressal Officer (GRO) by email, phone, or letter.
  - **Contact Number:** 9281023759
  - **Email ID:** [cgro@keertana.co](mailto:cgro@keertana.co)
  - **Postal Address for Courier:**  
Chief Grievance Redressal Officer (GRO) Keertana Finserv Limited  
Plot No. 31 & 32, Ramky Selenium Towers, Tower A, Financial District,  
Nanakramguda, Hyderabad, Telangana – 500032(\*Note: The Chief Grievance Redressal Officer of the organization also serves as the Principal Nodal Officer.)
2. **Filing a Complaint with the Reserve Bank of India (RBI):** If the customer has not received a response from the company or is not satisfied with the resolution provided within 30 days, a complaint can be lodged under Integrated Ombudsmen Scheme of RBI on the RBI's CMS portal (<https://cms.rbi.org.in>) or through a toll-free number-14448 (9:30 am to 5:15 pm) or email.
  - **Email ID:** [crpc@rbi.org.in](mailto:crpc@rbi.org.in)
  - For filing a complaint through letter, it can be drafted as per the format provided in the Ombudsman Scheme 2021 on the RBI website and sent to the following address:  
Centralised Receipt and Processing Centre (CRPC),  
4<sup>th</sup> Floor, Reserve Bank of India  
Central Vista, Sector 17, Chandigarh – 160017

The salient features of the RBI Integrated Ombudsman Scheme 2021 are enclosed herewith for reference as **Annexure A**. The same shall also be displayed in all the branches for customers' reference.

#### **10. Customer Service and Grievance Redressal Committee**

The Customer Service & Grievance Redressal Committee comprises of the following:

1. MD
2. Chief Financial Officer
3. Chief Compliance Officer
4. Chief Operating Officer
5. Chief Grievance Redressal Officer

The Committee shall ensure:

- a) To review the customer complaints received and actions thereto
- b) To discuss the measures which can be instituted for increasing customer delight
- c) Any other matter incidental thereto.

#### **11. Turn Around time**

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

| <b>S. No.</b> | <b>Category</b>                                          | <b>Turn Around Time (Working Days)</b>                                        |
|---------------|----------------------------------------------------------|-------------------------------------------------------------------------------|
| 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 Disbursement or Insurance Claim Settlement | 7 Days from the date of receipt of query                                      |
| 6.            | Issuers 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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## **Annexure A**

### **The Salient features of RBI Integrated Ombudsman Scheme 2021**

RBI has integrated the 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; into one “The Reserve Bank - Integrated Ombudsman Scheme, 2021”. The Scheme adopts ‘One Nation One Ombudsman’ approach by making the RBI Ombudsman mechanism jurisdiction neutral. The Integrated Ombudsman Scheme, 2021 is effective from November 12, 2021

#### **Following are the salient features of the Integrated Ombudsman Scheme, 2021:**

1. Any customer aggrieved by deficiency in service (a shortcoming or an inadequacy in any financial service, which the Regulated Entity is required to provide statutorily or otherwise, which may or may not result in financial loss or damage to the customer) may file a complaint in writing or otherwise under the Scheme.
2. There is no limit on the amount in a dispute that can be brought before the Ombudsman for which the Ombudsman can pass an Award. However, for any consequential loss suffered by the complainant, the Ombudsman shall have the power to provide a compensation up to Rupees 20 lakh, in addition to, up to Rupees One lakh for the loss of the complainant’s time, expenses incurred and for harassment/mental anguish suffered by the complainant.
3. Reserve Bank of India has established the Centralised Receipt and Processing Centre (CRPC) at Chandigarh for receipt of the complaints Pan India.
4. The complaint can be lodged online through the RBI portal (<https://cms.rbi.org.in>)
5. The complaint may also be submitted through electronic or physical mode to the Centralised Receipt and Processing Centre, Chandigarh at the given address: Centralised Receipt and Processing Centre (CRPC) Reserve Bank of India Central Vista, Sector 17 Chandigarh – 160017 Additionally, a Contact Centre with a toll-free number – 14448 (9:30 am to 5:15 pm) – is also being operationalised in Hindi, English and in eight regional languages to begin with and will be expanded to cover other Indian languages in due course. The Contact Centre will provide information/clarifications regarding the alternate grievance redress mechanism of RBI and to guide complainants in filing of a complaint.
6. **Matters not considered under the scheme**
  - Commercial Judgment/ commercial decision of a Regulated Entity (RE).
  - Dispute between vendor and Regulated Entity relating to outsourcing contract.
  - Grievance not addressed to Ombudsman directly.
  - General grievances against Management or Executives of a Regulated Entity.
  - Dispute in which action is initiated by a Regulated Entity in compliance with the order of a statutory or law enforcing authority.
  - Service not within regulatory preview of the Reserve Bank.

- Dispute between Regulated Entities.
- Dispute involving the employer-employee relationship of a Regulated Entity.

7. The complainant aggrieved by an Award or rejection of a complaint by Ombudsman Office may prefer an Appeal before the Appellate Authority within 30 days of the date of receipt of the Award or rejection of the complaint. The Appellate Authority may, if it is satisfied that the complainant had sufficient cause for not making the appeal within the time, may allow a further period not exceeding 30 days.

**8. Complaint under the scheme shall not lie unless**

1. Complainant had before making a complaint under the scheme, made a written complaint to Regulated Entity and-
  - a. Complaint got rejected wholly or partially and the complainant is not satisfied with reply or complainant had not received a reply within 30 days after Regulated Entity received complaint and
  - b. Complaint is made to Ombudsman within 1 year after complainant received reply from Regulated Entity or where no reply is received within 1 year and 30 days from date of the complaint.
2. The complaint is not in respect of the same cause of action which is already –
  - a. Pending before Ombudsman or settled or dealt with on merit by Ombudsman, whether or not received from the same complainant or along with 1 or more complainant or parties concerned.
  - b. Pending before any court, tribunal or arbitrator or settled or dealt with on merit by any Court, Tribunal or Arbitrator, whether or not received from the same complainant or along with 1 or more complainant or parties concerned.
  - c. Complaint in respect of the same cause of action does not include criminal proceeding pending or decided before a court or tribunal or any police investigation initiated in a criminal offence.
3. Complaint is not abusive or frivolous or vexatious in nature.
4. Complaint to Regulated Entity was made before the expiry of a period of limitation under the Limitation Act, 1963 for such claims.
5. The complainant provides complete information as per clause 11 of the scheme.
6. The complaint is lodged by the complainant personally or through the complainant personally other than the advocate unless complainant itself is an advocate.

For more details please refer to the Scheme details available on RBI website. The copy of the Scheme is also available in our branches, which will be provided to the customer for reference upon request.

The details of the Principal Nodal Officer are as under:

**Name:** Mr. B. Siva Kumar Reddy

**Contact No.:** 9281023759

**Email ID:** cgro@keertana.co

