

Arohan Financial Services Limited

CUSTOMER GRIEVANCE REDRESSAL POLICY

Version 8.0



Prepared by: Customer Grievance Redressal Committee

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Approved by : The Board of the Company

Last Date of Approval : February 12, 2025

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.

This policy on Customer 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 Queries/ complaints / grievances and/or give their feedback / suggestions to Arohan in relation to their interactions 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.

Further this policy has been being prepared in terms of: -

Master Direction DNBR.PD.008/03.10.119/2016-17:

Master Direction - Non-Banking Financial Company - Systemically Important Non-Deposit taking Company and Deposit taking Company (Reserve Bank) Directions, 2016 (“Direction”) which is substituted by Master Direction – Reserve Bank of India (Non-Banking Financial Company –Scale Based Regulation) Directions, 2023 (“Direction”) and its amended thereof.

Master Direction – Reserve Bank of India (Regulatory Framework for Microfinance Loans) Directions, 2022 (Updated as on July 25, 2022)

- Each RE shall have a dedicated mechanism for redressal of recovery related grievances. The details of this mechanism shall be provided to the borrower at the time of loan disbursement.

Master Direction - Reserve Bank of India (Internal Ombudsman for Regulated Entities) Directions, 2023

- The NBFC shall internally escalate all such complaints to the IO within a period of three weeks from the date of receipt of the complaint. The IO and the NBFC shall ensure that the final decision is communicated to the complainant within 30 days from the date of receipt of the complaint by the NBFC.

- In case of complaints that are fully or partly rejected even after examination by the IO, the NBFC shall necessarily advise to the complainant as part of the reply that he/she can approach the RBI Ombudsman for redress (if the complaint falls under the RBI Ombudsman mechanism) along with complete details. The advice should include the link to Reserve Bank’s portal (cms.rbi.org.in) for online filing of customer complaints.

1. Definitions

- 1.1. “Board” shall mean the Board of Directors of Arohan
- 1.2. “Customers” means all individual, Partnership Firms, LLPs and Companies, 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 Saturday/Sunday, a bank holiday or a public holiday in Kolkata
- 1.5. “GRO” shall mean Grievance Redressal Officer.
- 1.6. “PNO” shall mean Principal Nodal Officer
- 1.7. “PO” shall mean Principal Officer.
- 1.8. “COI” means Certificate of Insurance.

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 queries, complaints and grievances through proper service delivery and review mechanism and also to ensure prompt redressal of same, 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.
 - c) To define escalation levels in case customer’s complaint are not addressed at all or are 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. Process for customers to file complaints

Customer can lodge his / her grievance pertaining to deviations 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. Complaints in Person

Customers can submit their grievances at any of our branch offices. A Complaint register is placed at the branch for customers to register their grievances. Customer's may inform the ABH/BH about their complaint when they visit the branch. The number of CSR is shared in the Center register. The complaints registered at the branch will be shared to the Customer care team through SAMADHAN portal for updation in ZOHO CRM which will ensure complete visibility of complaints registered from all channels along with resolution. Customers can also visit our Regional/ Zonal or Head office for raising any complaint and the mentioned complaint will be shared to the Customer care team through SAMADHAN portal.

B. Through letter

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

The Grievance Redressal Officer: Mr. Bikash Kumar Gupta

Arohan Financial Services Limited

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

Salt Lake, Kolkata – 700091, West Bengal

C. 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.

D. 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 support through a customer insights team. A cloud-based Customer Relationship Management (CRM) system has been introduced to enhance the customer experience and provide on time solutions. The customer insights team is responsible for handling these queries and complaints of the customers, and also provide solution to the customer as per the agreed mechanism and procedure.

E. Complaints through WhatsApp

Customer can register their complaint on WhatsApp number (7605027711) from Monday to Friday (10 am to 6 pm). Similarly, the acknowledgement of the complaint will be given within 3 working

hours, and resolution to the complaint will be ensured according to the Customer Grievance Mechanism (Annexure A).

F. Complaints received by GRO

If any complaint reported to the branch/ Customer care has not been resolved as per TAT 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, he/she may also approach Arohan GRO by calling 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. GRO will revert back within 10 working days

Name: Mr. Bikash Kumar Gupta.
The Grievance Redressal Officer

Arohan Financial Services Limited

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

Salt Lake, Kolkata – 700091, West Bengal

Contact details of GRO: 033-40427726 and 9903019085 **Monday to Friday (10 am to 6 pm)**

E-mail: gro@arohan.in

G. Complaints received by Principal Nodal Officer

If any complaint reported to the branch/ Customer care/ GRO has not been resolved as per TAT 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, he/she may also approach Arohan PNO by calling his/her contact number as given below. The telephone number, 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. PNO will revert back within 5 working days:

Principal Nodal Officer (Mr. Arijit Roy)

Arohan Financial Services Limited

PTI Building, 4th Floor,

DP Block, DP-9, Salt Lake City

Kolkata- 700091

Phone: 033- 40156040 **Monday to Friday (10 am to 6 pm)**

E-mail: arijit.roy@arohan.in with a copy to: compliance@arohan.in.

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

Customer can register his/her complaint on toll free number -1800 102 1080 with MFIN, if any complaint reported to the branch/ Customer care/ GRO/ PNO has not been resolved as per TAT from the date of lodging the complaint with Arohan or if the customer is not satisfied with the resolution provided for complaint made by him/her, he/she may also approach MFIN by calling contact number as given above.

I. Complaints received through RBI/ NBFC Ombudsman

Customer can register his/her 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 9 of the Reserve Bank - Integrated Ombudsman Scheme, 2021 for NBFCs issued by RBI on November 12, 2021 for details visit https://rbidocs.rbi.org.in/rdocs/content/pdfs/RBIOS2021_amendments05082022.pdf, may himself/herself or through their authorized representative, make a complaint to the Ombudsman as specified in Clause 11 of the Reserve Bank - Integrated Ombudsman Scheme, 2021. The details Salient Features of The RBI Integrated Ombudsman Scheme, 2021 given below in Annexure-B.

For Insurance related queries and complaints

In addition to the above, for specifically Insurance related query or grievances, a customer can either contact the Insurance Company's Customer Care by referring to his/her details given in his/her Certificate of Insurance (COI) or can register his/her complaint at Arohan in the following manner:

Level 1: Principal Officer

If the resolution provided by the Customer Care Help Desk does not meet the expectation of the Customer or the customer has not received any response, the Customer may write to:

Principal officer

Arohan Financial Services Limited,

PTI Building, 4th Floor, DP Block, DP-9, Sector-V, Salt Lake, Kolkata – 700091, West Bengal

Email Id: po_insurance@arohan.in

The Principal Officer / customer care department shall also follow up with the Insurance company for providing speedy resolution.

Level 2: Insurance company

If the Customer is not satisfied with the reply provided by Principal Officer, then the Customer may write to the concerned Insurance company by obtaining their contact details from their website or from the Certificate of Insurance shared with the Customer by the Insurance Company in hard / soft copy form.

The Insurance Company and Arohan will mutually co-ordinate for end-to-end fair resolution of the complaint within 14 days of receiving all required information and documents.

Level 3 : Integrated Grievance Management System (IGMS)

In-case the complaint remains unresolved by the Insurance Company / Arohan at any point of time, then the Customer can:

- Directly register complaint in the Bima Bharosa Portal - <https://bimabharosa.irdai.gov.in/>
- Use the complaint online through IRDAI's Integrated Grievance Management System (<https://igms.irda.gov.in>)
- Call IRDAI on: Toll Free Number 155255 or 18004254732
- Send the complaint through Email to complaints@irdai.gov.in
- Write to Insurance Regulatory and Development Authority of India (IRDAI),
Policyholder's Protection & Grievance Redressal Department – Grievance Redressal Cell.
Sy No.115/1 ,4th floor, Financial District, Nanakramguda, Gachibowli, Hyderabad –500032

Level 4: Insurance Ombudsman

If the Customer's complaint still remains unresolved, the Customer can reach out to the Insurance Ombudsman.

4. Closure Process of any complaint

The Customer Insights Team receives complaints from the mentioned channels. Upon receipt of the complaint and required documentation, the Customer Insight Executive registers the complaint and speaks to all relevant stakeholders, as well as checks the Loan Management System (LMS) and the Insurance Claim Trackers (if necessary) to validate the query/complaint raised by the complainant. If the executive finds the complaint to be genuine, the complainant receives the complaint number within 3 working hours from the time of raising the complaint with the executive. The executive shares all details, including a voice recording of the complaint call, with the respective department as per the Grievance Redressal Mechanism (GRM) escalation matrix. TAT has been defined at each level (DRI) - direct responsible individual, Level 1 & Level 2 for response, along with designation. Details reflecting in the complaint category grid. Based on the response, the Customer Insights Team calls the complainant to update them that the complaint has been resolved. Thereafter, the complaint is closed in our system. SMS confirmations, with the detail of the complaint number, are sent to the customer when the complaint is raised and also when it is closed.

If any complaint cannot be closed within the TAT, then the DRI, with the approval of Escalation 1, needs to inform the GRO (bikash.gupta@arohan.in) through email for an extension of the TAT once before the TAT is over. However, the TAT days should not exceed more than 30 working days and 14 working days for Insurance related issues. In case of any complaints where external team (Insurance, CIC, Cross Sell product) dependency is observed, we need to communicate the TAT provided by the external team to the customer for resolution and close the loop on the complaint. As per the Integrated Ombudsman scheme of RBI, the resolution of any complaint with the written document need to be submitted at the RBI portal within 30 calendar days.

To ensure a better customer experience, we have re-designed our Grievance Redressal Mechanism by lowering our TAT days so that the customers can get faster resolution.

Query & Others: -

Category 1	Category 2	Category 3	Query Explanation	Risk	Turn Around Time (TAT)	Required to send mail	Mail to	mail copy (CC)
Loan	Application & Processing	Loan rejection	Loan rejected due to KYC, low attendance etc.	M	3	N	-	-
Loan	Application & Processing	Loan related	Loan activity queries like disbursement time, center meeting time etc	M	3	N	-	-
Loan	Application & Processing	Branch contact details	Wants branch/staff details	M	3	N	-	-
Loan	Application & Processing	Loan related	Non-customer received SMS regarding CB check or loan related details	M	3	Y	IT /Branch	AM, GRO
Loan	Application &	Digital lending application	Issues with digital application	M	3	N	-	-

	Processing							
Loan	Disbursement	Loan Request	New loan request (prospective customer)	L	3	Y	BH	AM, GRO
Loan	Disbursement	Loan Request	2nd cycle onwards loan request (existing customer)	M	3	Y	BH	AM, GRO
Loan	Disbursement	Digital loan request	Wants to take digital loan	M	3	Y	arohanprivilege.gl@arohan.in	GRO, SPOC of digital team
Loan	Disbursement	Digital loan disbursement related Queries	Disbursement amount not credited to bank account	M	3	Y	arohanprivilege.gl@arohan.in	GRO, SPOC of digital team
Loan	Disbursement	Loan related	Cashless disbursement related query (If required share mail)	M	3	Y	BH/Cashless team	AM, GRO
Loan	Disbursement	Mudra loan	Query regarding Mudra loan	L	3	N	-	-
Loan	Disbursement	Loan related	Customer lost her loan card	L	3	N	-	-
Loan	Re-payments	Loan related	Change in repayment date from centre	M	3	N	-	-
Loan	Re-payments	Loan related	Customer cannot pay due to financial crunch	H	3	N	-	-
Loan	Re-payments	Digital repayment	Digital repayment related query or query for complaints status.	M	3	N	-	-
Loan	Re-payments	Digital repayment	Digital payment agent calls regarding digital payment related issue.	M	3	Y	BH	AM, GRO
Loan	Re-payments	Digital lending repayment	Customer want to know about the online payment process or repayment related others queries (If required)	M	3	Y	arohanprivilege.gl@arohan.in	GRO, SPOC of digital team
Loan	Re-payments	Loan related	Query regarding Advance collection for holidays	M	3	N	-	-
Loan	Re-payments	Loan related	Cannot pay late fees	M	3	N	-	-
Loan	Closure	Loan Preclosure	Customer wants to precloser her loan	M	3	Y	BH	AM,GRO
Loan	Closure	Digital loan Preclosure	Customer wants to precloser the Digital loan	M	3	Y	Group Lead digital	Senior Manager digital lending, GRO
Loan	Closure	Loan related	Wants to pay double EMI for 2 years loan to pay off in a year	M	3	N	-	-
Loan	Closure	Loan related	Wants to pay off OD	M	3	Y	BH	AM, GRO
Loan	Closure	Loan related	NOC related query or customer request closure ledger	M	3	N	-	-
Loan	Closure	OTS/Sandhi account settled but FIS account is still open	Customer complains thatOTS/Sandhi account settled but FIS account is still open. Customer did not have any supportive documents for the same.	M	3	Y	BH	AM, GRO, Coordinator - Recovery
Loan	CIC related	Credit bureau	Customer's name showing in CB as active	M	3	Y	IT dept	Sr. Mgr.-IT, GRO
Loan	CIC related	Credit bureau	Customer's name showing in CB as active IDBI/IBL customer	M	3	N		

Loan	Other	Behaviour of group members/centre leader	Mis-behaviour amongst members or centre leader	L	3	Y	BH	GRO
Loan	Other	General	Shifting to a new location (provide BH contact no.)	L	3	Y	BH	GRO
Loan	Other	General	Member absent from centre meeting	L	3	Y	BH	GRO
Loan	Other	General	Center leader asking for money for loan sanction	H	3	Y	BH	GRO
Loan	Other	General	Group member calls to inform that customer is absconding	M	3	Y	BH	GRO
Loan	Other	General	Promotional calls	L	3	Y	concerned person or dept	-
Loan	Other	General	Employee/Non-employee calling to contact any person/department	L	3	N	-	-
Loan	Other	KYC related query	Regarding KYC related query, information for misuse of KYC	H	3	N	-	-
Loan	Other	General	Branch based collection	L	3	N	-	-
Loan	Other	Mudra cash credit	Query regarding IDBI-Mudra cash credit	M	3	N	-	-
Loan	Other	ILE	Query regarding ILE loan (send mail only if customer is interested)	L	3	Y	BH	GRO, GM-Credit,
Loan	Other	ICASH loan related	ICASH customer call for any query related to TDS refund, NOC, Settlement	M	3	N	-	-
Loan	Other	INOG related	INOG loan related query (If required share mail)	M	3	Y	Deputy Manager - Inorganic Credit	Operation Manager INOG,GRO
Loan	Other	HR related	Job application (forward to HR if CV received)	L	3	Y	HR Exec-RO/HO	HR Mgr.-RO, GRO
Loan	Other	HR related	Ex-employee for PF/salary/other HR related issues	L	3	Y	HR Exec-RO/HO	HR Mgr.-RO/HR AM-RO, GRO
Loan	Policy related	Wrong mobile number Query	Want to know wrong mobile number update in System complaints status	M	3	N	-	-
Loan	Policy related	KYC data deletion query	If received deletion request from a rejected customer (no loan disbursed at all) & very old customer (loan cycle completed more than 8 year ago) need to share request to piideletion@arohan.in. Else informed the process only	M	3	Y	IT dept	-
Loan	Loan related information	Feedback	Interest rate is high	M	3	Y	GRO	-
Loan	Loan related information	Feedback	Loan amount is small	M	3	Y	GRO	-
Loan	Loan related information	Feedback	Loan repayment tenure is high/low	M	3	Y	GRO	-
Loan	Loan related information	Feedback	Any other feedback regarding product or policy	M	3	Y	GRO	-

Loan	Other	Disconnected	Calls has been Disconnected by caller	L	3	N	-	-
Loan	Loan related information	Behaviours of group members/centre leader	Customer complains about other behaviour of other group members or centre leader	M	3	N	-	-
Loan	Re-payments	Customer paid Extra amount in Online mode / Paid to wrong loan account in Online mode	Customer informed that he/ She mistakenly paid extra amount from the emi amount or paid the amount to other customer account (Need to share mail if customer shared supportive documents)	M	5	Y	Digital Payment Coordinator	GRO, Deputy Manager - Project & MarCom, Branch team
Loan	Staff behaviour	Staff behaviour related	Customer call for query for staff visit or any behaviour related issue of staff but unable to provide details	M	3	N	-	-
Loan	Other	language barrier	Due to language barrier unable to answer customer query.	M	3	N	-	-
Insurance related	Process related	Credit Link Insurance (CLI)	i) If customer / co-borrower informs about death then CC team informs the customers the process to raise a claim (CC team may also intimate the concerned Branch if required), ii) For any claim process related query CC Team provides all the necessary information	M	3	N	-	-
Insurance related	Process related	Health Insurance (HI)	i) Claim related information – Application Process, ii) Claim Amount Discrepancy related query iii) General query CC Team provides all the necessary information	M	3	N	-	-
Insurance related	Process related	Digital lending Insurance (CLI)	If customer / co-borrower informs about death then CC team guides him/her to contact RM of Digital lending customers (CC team may also intimate concerned Dept. if required)	M	3	Y	arohanprivilege.gl@arohan.in	
Insurance related	Process related	Digital lending Insurance (HI)	i) Health Insurance Claim related information - Application Process, ii) Claim Amount Discrepancy related query iii) General query related information, CC team guide him/her to contact RM of Digital lending customers for	M	3	N	arohanprivilege.gl@arohan.in	

			further help (CC team may also intimate concerned Dept. if required),					
Insurance related	Process related	Double premium deducted in HI	Premium amount deducted twice (once debited from Disbursed amount directly, and second time cash collected during disbursement time or double amount deduction occurs) (This would be treated as Query with prior intimation only)	M	3	N	-	-
Insurance related	Documents related	Credit Link Insurance (CLI)	i) When customer enquires on pending documents (related to CLI), CC team guides him/her to contact branch ii) When customer provides the pending documents through Whats App or mail then CC Team forwards the same to concerned branch over mail for death tagging and further necessary action	M	3	N	-	-
Insurance related	Documents related	Health Insurance (HI)	i) When customer enquires on pending documents (related to HI), CC team guides him/her to contact branch and gives him/her process knowledge ii) When customer provides the receipt of documents received by branch with stamp through WhatsApp or mail then CC Team forwards the same to HI team at HUB directly for further processing and send the updates to the concerned branch	M	3	Y	HI Team at HUB	-
Insurance related	Documents related	Digital lending Insurance (CLI)	When customer enquires on pending documents (related to Digital Lending -CLI), CC team guides him/her to contact RM	M	3	N	-	-
Insurance related	Documents relate	Digital lending Insurance (HI)	When customer enquire on pending documents (related to Digital Lending -HI), CC team guides him/her to contact RM	M	3	N	-	-
Insurance related	Claim related	Credit Link Insurance (CLI)	When customer enquire the status of CLI claim after submission the documents	M	3	N	-	-

			CC Team provides the relevant information .					
Insurance related	Claim related	Health Insurance (HI)	When customer enquire the status of HI claim after submission the documents CC Team provides the relevant information	M	3	N	-	-
Insurance related	Claim related	Credit Link Insurance (CLI)	When customer enquires on claim status within 30 days from the document submission in case of Digital death certificate. OR When customer enquire on claim status within 90days from the document submission in case of Manual death certificate (Form No-6). CC Team provides the relevant information	M	3	N	-	-
Insurance related	Premium Refund related	Refund/cancellation of CLI/HI query	When customer asks for the cancellation of policy (CLI or HI) and requests for refunding of premium CC Team guides him/her with necessary information	H	3	N	-	-
Third-party products_Non-Financial	Information related	Cross Sell	Query regarding Cross sell product (send mail only if customer is interested), Cross sell complaints status	M	3	Y	BH	GRO, CS Team
Third-party product, Non-Financial	Quality related	Product quality issues	A) For a d. light product, CC can guide the customer for resolution as per process: Customer is required to submit faulty device at branch location, then d. Light service agent comes, checks unit and replaces it if faulty. Customer has to come again to the branch to pick up the unit. B) In case of quality related queries: - Customer care will provide the required details and contact number of brands to the customer and seek to contact the brand CC. Post receipt of the query, the customer care team will call the customer to confirm that the customer has placed the complaint with brand CC within 1	H	3	Y	Cross sell HO exec	Operations Manager Cross Sell, GRO,

			working day. If no, the required details to be shared with Cross sell Ho Exe, Cross sell Operation Manager and Head of Cross sell.					
Third-party products_Non-Financial	Delivery related	Cross Sell product not received.	A) Customer inform that the cross-sell product not received within 21 working days from the date of order.	H	3	Y	Cross sell HO exec	Operations Manager Cross Sell, GRO,
Third-party products_Non-Financial	Refund related	Refund/cancellation of cross sell product	Customer query for the refund /cancellation of cross sell product	H	3	N	-	-

Complaints: -

Category 1	New Category 2	Category 3	Complaint Explanation	Risk	DRI	DRI TAT	Escalation level 1	Escalation level 1 TAT	Escalation level 2	Escalation level 2 TAT	Total Turn Around Time (TAT)
Loan	Application & Processing	Products details not informed	Customer complains that she is not given the product details such as loan amount, interest rate, processing fee, insurance premium, repayment frequency, tenure and other conditions etc	Medium	BH	2 Working days	AM	1 Working day	RH	1 Working days	4 Working days
Loan	Application & Processing	Fee demanded for loan application	Customer complains that a fee is demanded for loan application by loan officer or centre leader etc	High	AM	2 Working days	RH	1 Working day	ZBH	1 Working days	4 Working days
Loan	Application & Processing	Fee charged for loan application	Customer complains that a fee is charged for loan application by loan officer or centre leader etc	High	AM	2 Working days	RH	1 Working day	ZBH	1 Working days	4 Working days
Loan	Application & Processing	Loan application not taken	Customer complains that loan officer is not taking the application for loan	Medium	BH	2 Working days	AM	1 Working day	RH	1 Working days	4 Working days
Loan	Application & Processing	Acknowledgment not given for loan application submitted	Customer complains that she has not received acknowledgment for the loan application she has submitted	Medium	BH	2 Working days	AM	1 Working day	RH	1 Working days	4 Working days
Loan	Application & Processing	Status of loan application not informed	Customer complains that she/he is not getting informed about the status of her/his loan application submitted	Medium	BH	2 Working days	AM	1 Working day	RH	1 Working days	4 Working days
Loan	Application &	Delay in processing/san	Customer complains that there is delay in her loan	Medium	BH	2 Working days	AM	1 Working day	RH	1 Working days	4 Working days

	Processing	ctioning of loan after loan application has been submitted	processing after submission of application			king days		ing day		ing days	king days
Loan	Applicati on & Processin g	Loan rejected and reasons not disclosed	Customer complains that her loan application is rejected but reasons not given by the company	Med ium	BH	2 Wor king days	AM	1 Work ing day	RH	1 Work ing days	4 Wor king days
Loan	Applicati on & Processin g	Loan rejected but customer contesting the reasons given for rejection	Customer complains that reasons given by the company for rejecting her loan application are not correct or right	Med ium	BH	2 Wor king days	AM	1 Work ing day	RH	1 Work ing days	4 Wor king days
Loan	Disburse ment	Loan approved/sanct ioned but disbursement not received	Customer complains that her loan is approved/sanctioned but disbursement is not received	Med ium	BH	2 Wor king days	AM	2 Work ing days	RH	1 Work ing days	5 wor king Days
Loan	Disburse ment	Disbursement amount received is less/more than sanctioned amount	Customer complains that she/he has received disbursement (either in cash or cash-less) less or more than sanctioned amount	Med ium	BH	2 Wor king days	AM	2 Work ing days	RH	1 Work ing days	5 wor king Days
Loan	Disburse ment	NEFT fail & customer submitted documents for re NEFT but disbursement not received	Customer complains that NEFT fail & she/he share documents for re NEFT but till disbursement not received after 3 days	Med ium	Branch & Cashless team	2 Wor king days	AM	2 Work ing days	RH	1 Work ing days	5 wor king Days
Loan	Disburse ment	Disbursement not credited in bank account	Scenario 1 :- Customer complains that disbursement amount is not credited in her bank account or Scenario 2 :- Customer complains that disbursement amount is not credited in her bank account but loan account is open	Med ium	BH	2 Wor king days	AM	2 Work ing days	RH	1 Work ing days	5 wor king Days
Loan	Disburse ment	Digital loan disbursement not credited in bank account	Customer complains that Digital loan disbursement not credited in bank account	Med ium	Group Lead	1 Wor king day	Manag er-Digital Lendin g Support Services	1 Work ing day	Head of Digita l Growth	1 Work ing days	3 wor king Days
Loan	Disburse ment	Fake/soiled note received in disbursement	Customer complains that she has received fake/soiled note in the disbursement	Med ium	BH	2 Wor king days	AM	1 Work ing day	RH	1 Work ing days	4 Wor king days
Loan	Disburse ment	Customer not able to withdraw cash from pre-paid card	Customer complains that she is unable to withdraw cash from pre-paid card issued for disbursement	Med ium	BH	2 Wor king days	AM	1 Work ing day	RH	1 Work ing days	4 Wor king days
Loan	Disburse ment	Customer not getting support for loss/damage pre-paid card	Customer complains that she is not getting support for loss/damage of pre-paid card issued to her for disbursement	Med ium	BH	2 Wor king days	AM	1 Work ing day	RH	1 Work ing days	4 Wor king days
Loan	Disburse ment	Customer not getting support for new password for pre-paid card	Customer complains that she is not getting support for issue of new password for pre-paid card issued to her for disbursement	Med ium	BH	2 Wor king days	AM	1 Work ing day	RH	1 Work ing days	4 Wor king days

Loan	Disbursement	Loan agreement not given	Customer complains that she has not received the loan agreement	Medium	BH	2 Working days	AM	1 Working day	RH	1 Working days	4 Working days
Loan	Disbursement	Loan agreement does not include key details like interest rates, processing fee, insurance premium, loan amount, tenure, repayment frequency, CGRM etc	Customer complains that copy of her loan agreement does not include key details like interest rates, processing fee, insurance premium, loan amount, tenure, repayment frequency, CGRM etc	Medium	BH	2 Working days	AM	1 Working day	RH	1 Working days	4 Working days
Loan	Disbursement	Loan card not given	Customer complains that she has not received the loan card	Medium	BH	2 Working days	AM	1 Working day	RH	1 Working days	4 Working days
Loan	Disbursement	Loan card does not include key details	Customer complains that copy of her loan card does not include key details like interest rates, processing fee, insurance premium, loan amount, tenure, repayment frequency, CGRM etc	Medium	BH	2 Working days	AM	1 Working day	RH	1 Working days	4 Working days
Loan	Disbursement	Loan sanctioned without customer's consent	Customer complains that the loan has been disbursed to her without her informed consent	High	BH	3 Working days	AM	2 Working days	RH	2 Working days	7 Working days
Loan	Disbursement	Loan disbursed without customer's consent	Customer complains that the loan has been disbursed to her without her informed consent	High	BH	3 Working days	AM	2 Working days	RH	2 Working days	7 Working days
Loan	Disbursement	Loan converted without customer's consent	Customer complains that the loan has been converted to her without her informed consent	High	Branch	2 Working days	AM	2 Working days	RH	1 Working days	5 Working Days
Loan	Repayments	Repayments done not acknowledged/updated	Customer complains that repayments done by her are not updated in the loan card or system or she has not received the receipt	High	BH	3 Working days	AM	2 Working days	RH	2 Working days	7 Working days
Loan	Repayments	Penalty demanded/charged for delayed repayment	Customer complains that she/he is demanded/charge penalty amount for delayed repayment	High	BH	3 Working days	AM	2 Working days	RH	2 Working days	7 Working days
Loan	Repayments	Online repayment related issues	Online repayment related issues such as Customer made online payment, not reflecting in AROHAN book, Customer not able to make online payment with generic error	High	Digital Payment Coordinator	2 Working days	Head Product Management	1 Working day	Head of Central Operation	1 Working days	4 Working days
Loan	Repayments	Online repayment related issues for digital loan	Deducted double EMI of digital loan	High	Group Lead digital	2 Working days	Senior Manager digital lending	1 Working day	Head of Digital Growth	1 Working days	4 Working days
Loan	Re-	Repayment	Customer complains that	High	BH	2	AM	1	RH	1	4

	payments	demand/collected before due date	advance repayment (before the due date) is demanded or collected			Working days		Working day		Working days	Working days
Loan	Re-payments	Penalty charged for absence from centre meeting	Customer complains that she is demanded /charged penalty fee for absence from the centre meeting	High	BH	2 Working days	AM	1 Working day	RH	1 Working days	4 Working days
Loan	Re-payments	Pragati premium loan repayment update issue	Customer informed that there is a payment update issue in Pragati premium loan	High	Accounts Exec	2 Working days	Manager Credit Underwriting	2 Working days		1 Working days	5 working Days
Loan	Closure	Pre-closure not allowed	Customer complains that she/he is not permitted to pre-close the loan	Medium	BH	2 Working days	AM	1 Working day	RH	1 Working days	4 Working days
Loan	Closure	Penalty demanded/charged for pre-closure	Customer complains that she is demanded/charged penalty amount for pre-closure	Medium	BH	2 Working days	AM	1 Working day	RH	1 Working days	4 Working days
Loan	Closure	Forced for pre-closure	Customer complains that she is forced to pre-close the loan	Medium	BH	2 Working days	AM	1 Working day	RH	1 Working days	4 Working days
Loan	Closure	Final discharge/acknowledgement for closure	Customer complains that she is not given final discharge/acknowledgement for closure of loan	Medium	BH	2 Working days	AM	2 Working days	RH	1 Working days	5 working Days
Loan	Closure	Customer complains that NOC not received for Pragati premium loan	NOC not received for Pragati premium loan	Medium	HUB - Team	5 working Days					5 working Days
Loan	Closure	OTS/Sandhi account settled but FIS account is still open	Customer complains that OTS/Sandhi account settled but FIS account is still open	Medium	Coordinator - Recovery	2 working Days	Corporate Operation Manager	2 Working days	Head of Legal	1 working Days	5 working Days
Loan	Staff behaviour	Subjected to indecent/abusive behaviour	Customer complains that she is being subjected to indecent and abusive behaviour, sexual harassment or language	High	AM	2 Working days	RH	1 Working day	ZBH	1 Working days	4 Working days
Loan	Staff behaviour	Home visit in late hours	Customer home is visited in late hours for application/documents/repayment/attendance etc	High	AM	1 Working day	RH	1 Working day	ZBH	1 Working day	3 Working days
Loan	Staff behaviour	Staff not coming or coming late	Customer complains that staff does not come or comes late from agreed time given to her	Medium	AM	1 Working day	RH	1 Working day	ZBH	1 Working day	3 Working days
Loan	Excessive charges	Un-authorized collection of charges	Customer complains that she/he is charged un-authorized fee (other than processing fee, interest premium, scheduled repayment)	High	AM	3 Working days	RH	2 Working days	ZBH	2 Working days	7 Working days
Loan	CIC related	Dispute with Credit Information Report (CIR)	Loan closed but not updated in system	High	Rectification Officer	3 Working days	Senior Team Leader Central HUB	2 Working days	Head of Central Hub	2 Working days	7 working Days
Loan	CIC related	Dispute with Credit Information	Customer complains that her records in Credit Information Report (CIR)	Medium	Rectification Exe	3 Working	Rectification Officer	2 Working	Head of Centr	2 Working	7 Working

		Report (CIR)	is not correct			days		days	al Hub	days	days
Loan	Data Privacy	Breach of personal data	Customer complains that her data has been shared externally with third parties without her consent	High	BH	2 Working days	AM	1 Working day	RH	1 Working days	4 Working days
Loan	Data Privacy	Misuse of KYC	Customer complains that her KYC documents/IDs have been misused	High	AM	2 Working days	RH	1 Working day	ZBH	1 Working days	4 Working days
Loan	Policy related	Policy violation	Customer complaints repayment or disbursement is not done as per Policy	Medium	AM	2 Working days	RH	1 Working day	ZBH	1 Working days	4 Working days
Loan	Policy related	Subjected to discrimination	Customer complains that she is discriminated on account of her ethnicity, gender, age, disability, political affiliation, sexual orientation, caste, and religion	Medium	AM	2 Working days	RH	1 Working day	ZBH	1 Working days	4 Working days
Loan	Incomplete disclosure	Not informed of terms and condition	Customer complains that she is not informed about terms and condition associated with loan	Medium	BH	2 Working days	AM	1 Working day	RH	1 Working days	4 Working days
Loan	Policy related	Wrong mobile number complaints	Wrong mobile number update in System	Medium	BH	3 Working days	AM	2 Working days	RH	2 Working days	7 Working days
Loan	Policy related	Wrong mobile number complaints	Wrong mobile number not update in System but customer received the call as per system	Medium	Senior developer IT	3 Working days	Senior Business Analyst IT	2 Working days			5 Working days
Loan	Complaints support related	Complaint is not registered over Phone to Customer Care	Customer complains that her complaint is not registered or taken at customer care	High	Head Customer Insight	2 Working days	Head Product Management	1 Working day	Head of Central Operation	1 Working days	4 Working days
Loan	Complaints support related	Complaint is not registered at branch	Customer complains that her complaint is not registered or taken at branch	Medium	AM	2 Working days	RH	1 Working day	ZBH	1 Working days	4 Working days
Loan	Financial Misappropriation related	Complaints tending to financial misappropriation	Customer complains tending to financial misappropriation.	High	Fraud.info	25 Working days					25 Working days
Loan	Complaints support related	Complaint is not resolved	Customer complains that her complain is not getting resolved	Medium	Head Customer Insight	2 Working days	Head Product Management	1 Working day	Head of Central Operation	1 Working days	4 Working days
Loan	Digital loan related	Issue related to digital loan	Customer complaint any issue related to digital loan such as loan details, repayment details	Medium	Group Lead	2 Working days	Manager-Digital Lending Support Services	2 Working days	Head of Digital Growth	1 Working days	5 working Days
Loan	Claim related	Repayment collected after death has not been refunded	Customer complains that repayment collected after date of death has not been refunded	High	Accounts Exec	2 Working days	Accounts Team Lead	1 Working day	Accounts head	1 Working days	4 Working days

Loan	Closure	All EMI paid but account not closed	As per payment details all emi paid & posted to system but loan account not closed due to reversal entry	Medium	BH	2 Working days	AM	2 Working days	RH	1 Working days	5 working Days
Loan related	Account closure related	Loan Account Closure after insurance claim settlement	As per CLI tracker Claim is settled but loan account is not closed	High	Accounts Exec	2 Working days	Accounts Team Lead	1 Working day	Accounts Head	1 Working days	4 Working days
Others	Environment & Social	Complaints related to Environment & Social	Customer complaints related to Environment & Social disbalance.	Medium	ESG officer	30 Working days					30 Working days
Insurance related	Process related	CLI- claim not tagged after submission of all documents	Complaint lodged by the customer when death tagging is not done by Branch end and all relevant documents have been submitted by the customer and shared with Branch through CC Team	High	BH/CRM	2 Working days	AM/DRM	2 Working days	RH/AGM - Debt Receivable	1 Working days	5 Working days
Insurance related	Process related	Repayment not stopped after death of insured person	Complaint lodged by the customer when repayment has not been stopped after death of insured member	High	BH	2 Working days	AM	1 Working day	RH	1 Working days	4 Working days
Insurance related	Process related	Product/Plan feature is not provided	Complaint lodged by the customer regarding unawareness of product features or the Insurance plan coverage	Medium	BH	2 Working days	AM	1 Working day	RH	1 Working days	4 Working days
Insurance related	Process related	Receipt of premium payment	Complaint lodged by customer for not receiving any premium payment receipt like loan card, loan agreement or other receipt	High	AM	2 Working days	RH	1 Working day	ZBH	1 Working days	4 Working days
Insurance related	Documents related	CLI- Claim Documents not getting collected by Field team	Complaint lodged by customer when customer is not getting support from branch , documents are not being collected by the field team	High	BH	2 Working days	AM	1 Working day	RH	1 Working days	4 Working days
Insurance related	Documents related	HI-Claim Documents not collected by field team	Complaint lodged by customer when customer is not getting support from branch , documents are not being collected by the field staff	High	BH	2 Working days	AM	1 Working day	RH	1 Working days	4 Working days
Insurance related	Documents related	CLI- claim not received after submission of the documents	Complaint lodged by the customer when as per the claim tracker, relevant documents have been submitted but only claim form missing from branch end.	High	BH/CRM	2 Working days	AM/DRM	2 Working days	RH/AGM-Debt Receivable	1 Working days	5 Working days
Insurance	Documents	HI- claim not	Complaint lodged by the	High	BH	2	AM	2	RH	1	5

ce related	ts related	received after submission of the documents	customer when as per the claim tracker, relevant documents have been submitted but only claim form missing from branch end.			Working days		Working days		Working days	Working days
Insurance related	Document related	CLI- claim not received after submission of the documents under Digital lending loan	As per Claim Portal, All Documents submitted by Customer but pending from RM of Digital Lending Team for processing	High	arohanprivilege.gl@arohan.in	2 Working days	Manager-Digital Lending Support Services	2 Working days	Head of Digital Growth	1 Working days	5 Working days
Insurance related	Document related	HI--claim not received after submission of the documents under Digital lending loan	As per Claim Portal, All Documents submitted by Customer but pending from RM of Digital Lending Team for processing	High	arohanprivilege.gl@arohan.in	2 Working days	Manager-Digital Lending Support Services	2 Working days	Head of Digital Growth	1 Working days	5 Working days
Insurance related	Claim related	CLI-claim amount not received after submission of the documents	As per Claim portal All documents submitted by customers and sent to Insurer but pending from insurer end beyond 30/90 days for settlement **Claim processing TAT is 30 days for Digital Death Certificate submission ** Claim Processing TAT is 90 days for manual Death Certificate submission	High	Insurance claim team	2 Working days	Operations Manager Cross Sell	2 Working days	Head Cross Sell	1 Working days	5 Working days
Insurance related	Claim related	HI- claim amount not received after submission of the documents	Complaint lodged by the customer when as per HI claim tracker documents submitted and sent to Insurer but after 15 working days claim is not settled.	High	HI Claim Team	2 Working days	Operations Manager Cross Sell	2 Working days	Head Cross Sell	1 Working days	5 Working days
Insurance related	Claim related	CLI-claim not received after submission of the documents under Digital lending loan	As per Claim portal All documents submitted by customers and sent to Insurer but pending from insurer end beyond 30/90 days for settlement **Claim processing TAT is 30 days for Digital Death Certificate submission ** Claim Processing TAT is 90 days for manual Death Certificate submission	High	Insurance claim team	2 Working days	Operations Manager Cross Sell	2 Working days	Head Cross Sell	1 Working days	5 Working days
Insurance related	Claim related	HI- claim amount not received after submission of the documents	Complaint lodged by the customer when as per HI claim tracker documents submitted and sent to	HI Claim Team	2 Working days	Operations Manager	2 Working days	Head Cross Sell	1 Working days	5 Working days	HI Claim Team

		under Digital lending loan	Insurer but after 15 working days claim is not settled.			Cross Sell						
Insurance related	Claim related	HI- Claim amount received is less than the claimed amount	Complaint lodged by the customer for receiving amount lesser than claim Amount for HI	High	HI Claim Team	2 Working days	Operations Manager Cross Sell	1 Working day	Head Cross Sell	1 Working days	4 Working days	
Insurance related	Mis selling/Force selling	Customer is forced to buy CLI/HI product	Complaint lodged by the customer for mis selling or forced selling	High	AM	2 Working days	RH	1 Working day	ZBH	1 Working days	4 Working days	
Insurance related	Refund related	Refund/cancellation of CLI/HI premium	When customer asks for the cancellation of policy (CLI or HI) and requests for refunding of premium	High	BH	3 Working days	Operations Manager Cross Sell	2 Working days	Head Cross Sell	2 Working days	7 working Days	
Third-party products_Non-Financial	Mis selling/Force selling	Customer forced to buy third-party/cross-sell product	Customer complains that she is forced to buy a third-party/cross-sell product	High	AM	2 Working days	RH	1 Working day	ZBH	1 Working days	4 Working days	
Third-party products_Non-Financial	Incomplete disclosure	Customer not informed about charges of third-party/cross-sell product	Customer complains that she is not informed about the cost/charges of third-party/cross-sell product	High	BH	2 Working days	AM	1 Working day	RH	1 Working days	4 Working days	
Third-party products_Non-Financial	Incomplete disclosure	Customer not informed/mis-informed about product features	Customer complains that she is not informed or mis-informed about features of third-party/cross-sell product	High	BH	2 Working days	AM	1 Working day	RH	1 Working days	4 Working days	
Third-party products_Non-Financial	Process related	Receipts/documents not provided for purchased product	Customer complains that she is not given receipt/document for the purchased third-party/cross-sell product	High	Cross sell HO exec	2 Working days	Operations Manager Cross Sell	1 Working day	Head Cross Sell	1 Working days	4 Working days	
Third-party products_Non-Financial	Delivery related	Delay in delivery of product	customer complains that she has purchased/taken loan for the product but the product has not been delivered / service not rendered to her	High	Cross sell HO exec	2 Working days	Operations Manager Cross Sell	1 Working day	Head Cross Sell	1 Working days	4 Working days	
Third-party products_Non-Financial	Quality related	Product quality issues	Customer is not getting support for defects in third-party/cross-sell product	High	BH	2 Working days	AM	1 Working day	RH	1 Working days	4 Working days	
Third-party products_Non-Financial	Refund related	Refund/cancellation of cross sell product	Customer is asking for the refund /cancellation of cross sell product	High	BH	3 Working days	Operations Manager Cross Sell	2 Working days	Head Cross Sell	2 Working days	7 working Days	
Third-party products_Non-Financial	Closure	Cross sell product not received but loan account active in system	Scenario 1 :- Customer complains that cross sell products not received but loan account active in system. Scenario 2 :- Customer complains that cross sell products not received	High	HUB - Team Lead	3 Working days	Cross sell HO exec	2 Working days	Operations Manager Cross Sell	2 Working days	7 working Days	

			but loan account created & closed in FIS by posting EMI deducted main loan EMI.								
Third-party products_Non-Financial	Process related	Customer loan application cancelled & cross sell amount deducted	Customer complains that his/ her loan is cancelled but cross sell amount deducted not refunded yet	High	Hub cross sell TL	2 Working days	Operations Manager Cross Sell	2 Working days	Head Cross Sell	1 Working days	5 Working days

5. Outbound Calls to 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:

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

Arohan will commission monthly Loan Verification, Customer Satisfaction, Dropout, Overdue Cross Sell and other Need based surveys by their Customer Insights team. All these surveys will consist of a brief survey questionnaire around feedback on products, processes, service quality, and staff behavior.

6. Customer Grievances Committee

There is a specific Customer Grievance Committee, the Committee has been formed with the participation of each concerned department, such as Human Resource, Risk, Credit, Audit, Compliance & Legal, Business and Central Operations, chaired by Head of Central Operations. The committee also include an Internal Ombudsman (IO). 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. Mandatory display at the offices

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

- a) Call centre number and the details of escalation matrix displayed (in the vernacular language) for the benefit of customers. 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.
- b) Name and contact details (Telephone / Mobile number / email address) of the Grievance Redressal Officer who can be approached by the customer for resolution of complaints against Arohan.
- c) MFIN Toll Free Number at its offices/branches.
- d) Salient features of The Reserve Bank- Integrated Ombudsman Scheme, 2021.
- e) For Insurance, separate escalation matrix displayed for the benefits of customers.

8. Reporting to Board of Directors

Summary of the customer grievance reports along with actions initiated would be reported to the Board during each quarterly meeting. The report shall contain information like, the total number of complaints received, resolved and pending, with reasons thereof, which will be placed before the Board for information / guidance.

9. 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.

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	Turn Around Time (TAT)	Contact person’s Name/Designation	Contact Details

Level	Turn Around Time (TAT)	Contact person's Name/Designation	Contact Details
1	3 working days	Customer Service Representative/ Branch Head	<ol style="list-style-type: none"> Center Attendance Register Loan Card At branch premises in the complaint register
2	As per TAT	Customer Care Help Desk	Tollfree: 1800-103-2375 Email: customercare@arohan.in WhatsApp: 7605027711 Address: PTI Building, 4 th Floor, DP-9, DP Block, Sector-5, Salt Lake, Kolkata-700091
3	10 working days	Grievance Redressal Officer (GRO) Mr. Bikash Kumar Gupta. Arohan Financial Services Limited	Tel :033-40427726, 9903019085 Email: gro@arohan.in Address: PTI Building, 4 th Floor, DP-9, DP Block, Sector-5, Salt Lake, Kolkata-700091
4	5 working days	Principal Nodal Officer (PNO) Mr. Arijit Roy Arohan Financial Services Limited	Tel: 033 4015-6040 Email: arijit.roy@arohan.in with a copy to compliance@arohan.in Address: PTI Building, 4 th Floor, DP-9, DP Block, Sector-5, Salt Lake, Kolkata-700091
5	15 days	MFIN Toll Free Number	MFIN Toll free: 1800-102-1080
6	30 days	Reserve Bank of India (RBI) Officer-in-Charge, Regional Office, Department of Non- Banking Supervision	RBI Contact Center–14448 Login at: https://cms.rbi.org.in/ Phone No–033-2230 7850/ 8331 Email: crpc@rbi.org.in Department of Non-Banking supervision 4th Floor, Sector 17, Chandigarh-160017

Annexure – B

SALIENT FEATURES OF THE RESERVE BANK - INTEGRATED OMBUDSMAN SCHEME, 2021

RBI has integrated 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; into one “The Reserve Bank- Integrated Ombudsman Scheme, 2021” (the “**Scheme**”). The Scheme adopts ‘One Nation One Ombudsman’ approach by making the RBI Ombudsman mechanism jurisdiction neutral. Any customer aggrieved by deficiency in service (a shortcoming or an inadequacy in any financial service or such other services related thereto, which the Company 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.

The Integrated Ombudsman Scheme, 2021 is effective from November 12, 2021.

Some of the salient features of the Scheme are:

1. It will no longer be necessary for a complainant to identify under which scheme he/she should file complaint with the Ombudsman.
2. 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".
3. The Scheme has done away with the jurisdiction of each ombudsman office.
4. A Centralised Receipt and Processing Centre has been set up at RBI, Chandigarh for receipt and initial processing of physical and email complaints in any language.
5. The responsibility of representing the Arohan ("**Regulated Entity**") and furnishing information in respect of complaints filed by customers against the Regulated Entity would be that of the Principal Nodal Officer in the rank of a General Manager in a Public Sector Bank or equivalent.
6. The Regulated Entity will not have the right to appeal in cases where an Award is issued by the ombudsman against it for not furnishing satisfactory and timely information/documents.
7. A copy of the Scheme is available on the RBI website and on the CMS portal (<https://cms.rbi.org.in>).
8. Procedure for filing complaint: -
 - i. The Complaints may be lodged online through the RBI portal (<https://cms.rbi.org.in>).
 - ii. The complainants may also submit their complaints through the dedicated e-mail at CRPC@rbi.org.in or sent in physical mode to the 'Centralised Receipt and Processing Centre' set up at Reserve Bank of India, 4th Floor, Sector 17, Chandigarh – 160017 in the attached format (**Annexure A**).
 - iii. 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.
 - iv. The Principal Nodal officer appointed by the Regulated Entity shall be responsible for representing the Regulated Entity and furnishing information on behalf of the Regulated Entity in respect of complaints filed. Please visit

our website for contact details of the Principal Nodal Officer of the Company.

- v. Regulated Entity on receipt of the Complaint, should furnish written response along with all the relevant documents to the Ombudsman within 15 days of receipt of the complaint. Provided that the Ombudsman may, at the request of the Regulated Entity in writing to the satisfaction of the Ombudsman, grant such further time as may be deemed fit to file its written version and documents.
- vi. The Ombudsman/Deputy Ombudsman may reject a complaint at any stage if the same is not maintainable under the Scheme.
- vii. The complainant aggrieved by an Award may within 30 days of the date of receipt of the Award or rejection of the complaint, prefer an appeal before the Appellate Authority. The Executive Director-in charge of Consumer Education and Protection Department of RBI would be the Appellate Authority under the Scheme. Provided that the Appellate Authority may, if he 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.

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 the Company 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 authorized representative other than an advocate unless the advocate is the aggrieved person.

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

FORM OF COMPLAINT (TO BE LODGED) WITH THE OMBUDSMAN

[Clause 11(2) of the Scheme]

(TO BE FILLED UP BY THE COMPLAINANT)

All the fields are mandatory except wherever indicated otherwise

To

The Ombudsman

Madam/Sir,

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

..... (n

ame

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 Number.....

E-mail (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 ^{1*1} ?	Yes	No
(ii)	is made through an advocate, except when the advocate is the aggrieved party?	Yes	No
(iii)	has already been dealt with or is under process on the same ground with the Ombudsman?	Yes	No
(iv)	is in the nature of general complaint/s against Management or Executives of a Regulated Entity?	Yes	No
(v)	is on account of a dispute between Regulated Entities?	Yes	No
(vi)	involves employer-employee relationship?	Yes	No

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)

^{1*1} **Complaint is sub-judice/under arbitration** if the complaint in respect of the same cause of action is already pending/dealt with on merits by any Court, Tribunal or Arbitrator or any other Authority, whether individually or jointly.

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)