



ORANGE RETAIL FINANCE INDIA PRIVATE LIMITED

POLICY ON GRIEVANCE REDRESSAL MECHANISM

APPROVAL AUTHORITY:

Document Classification	External
Created by	Compliance Department
Approved by	Board of Directors of the Company

POLICY ON GRIEVANCE REDRESSAL MECHANISM

I. Background

Orange Retail Finance India Private Limited ("**ORFIL**" or "**Company**") is a private limited company incorporated under the Indian Companies Act, 1956 and is registered with the Reserve Bank of India ("**RBI**") as a deposit taking non-banking finance company ("**NBFC**") falling under the Base layer as per RBI Scale Based Regulations.

This Policy on Grievance Redressal Mechanism ("Policy") has been formulated as per Master Direction – Reserve Bank of India (Non-Banking Financial Company Scale Based Regulation) Directions, 2023 dated October 19, 2023 erstwhile RBI/DNBR/2016- 17/45 Master Direction DNBR.PD.008/03.10.119/2016-17 dated September 1, 2016 and Reserve Bank - Integrated Ombudsman Scheme, 2021 dated November 12, 2021 and further modified as per RBI Master Direction - Reserve Bank of India (Internal Ombudsman for Regulated Entities) Directions, 2023 dated December 29, 2023 ("collectively known as Applicable Laws").

II. About the Policy

This Policy on the Grievance Redressal Mechanism ("Policy") of the Company is set out as a mechanism available within the organization for addressing and resolving customer(s) complaints/ grievances relating to the deficiency in services offered by the Company. It describes the various channels for lodging a complaint, obtaining solutions from the concerned department and responding to customers with a solution within the stipulated time period.

III. Objectives of the Policy

The Policy stipulates an effective and suitable mechanism for receiving and addressing complaints from customers with specific emphasis on resolving such complaints fairly and expeditiously regardless of the source of the complaint.

The objectives of the Policy are as follows:

- To treat all customers in a fair and unbiased manner including the customers with disabilities;
- To guide customers who wish to lodge a formal complaint and also provide alternate avenues of grievance escalation in case the customer is discontent/ unhappy with the response or resolution;
- To enlist various modes through which customers can register complaints;
- To create effective processes to respond to customer grievances/complaints;
- To define escalation levels in case customer's complaint is not addressed at all or is not addressed satisfactorily; and
- To define timelines for closure of complaints.

IV. Scope of the Policy

The processes contained in this Policy are applicable to all employees (permanent as well as contractual), branches, offices and locations of the Company across the country and to all activities where there is an interaction with prospective or existing customers.

A customer is a person or entity that has availed a loan, or obtained any other form of financing from the Company. This will also apply to customers who have opted for any third party products offered / distributed by the Company.

A complaint is an expression of dissatisfaction or resentment either in the form of a representation or an allegation made in writing or through an approved electronic channel containing a grievance alleging deficiency in the following areas:

- Services, products, policies and procedures of the Company;
- Services provided to customers by any outsourced agent or agency¹ of the Company;
- Employee behavior towards the customers of the Company; and
- Confidentiality and protection of the personal (including sensitive personal information) and financial information² of the Company's customers.

Requests that deal with data modification (e.g. request for address change, change of bank details/mandate etc.) or enquiries about loan products / schemes, interest rates or other such similar requests do not fall under the purview of this Policy.

Any complaint that discloses or demonstrates information that may evidence an unethical, illegal or improper activity or any other misconduct as defined under section "Scope" of the Company's "WHISTLEBLOWER POLICY" will be addressed by following the process/ procedures outlined in that policy.

¹ In terms of RBI Directions on Managing Risks and Code of Conduct in Outsourcing of Financial Services by NBFCs [DNBR.PD.CC.No.090/03.10.001/2017-18]

² In terms of Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011

V. Key Commitments

The Company is committed to ensure the highest level of customer satisfaction and has set out the following guidelines to be followed when dealing with existing and prospective customers.

1. Act fairly and reasonably in all dealings with its customers by ensuring that:
 - All products and services meet relevant laws and regulations, as applicable from time to time;
 - Customer dealings are honest and transparent; and
 - The process and procedures of the Company are in the best interest of its customers.
2. Assist customers in selecting financial products and services by:
 - Providing relevant information in English and/or a local language of choice;
 - Explaining the financial implications of any product and service; and
 - Allowing the customer to choose the one that meets his/her needs.
3. Make every attempt to ensure that the customers have a trouble-free experience in dealing with the Company and its employees. In case of errors of commissions and/or omissions, the Company will deal with the same on priority by:
 - Correcting mistakes;
 - Addressing customer complaints;
 - Guiding the customer on the escalation process in case of any dissatisfaction; and
 - Reversing any charges including interest applied to a customer's account due to an error or oversight by the Company.

VI. **Level 1: Procedure for Raising a Complaint with the Customer Care Team**

A. Customers can raise their complaints through the following means:

- By physically visiting the premises of the Company's branches or head office between 10:00 a.m. and 6:30 p.m., from Monday to Friday and between 10.00 a.m. to 3.30 p.m. on Saturday (except on public holidays) and raising a complaint through designated official;
- By sending a letter by way of post to the address of respective branch offices or the head office;
- By writing an email addressed to customercare@orangeretailfinance.com;
- By placing a call on the helpline number 95858 90000 between 10:00 a.m. and 6:30 p.m., from Monday to Friday and between 10.00 a.m. to 3.30 p.m. on Saturday (except on public holidays); or

All the Complaints raised through above means will be forwarded to the Customer Care Team for resolution at First level.

Each customer should provide the following information while raising a complaint through any of the appropriate channels:

- Customer's full name as per the records submitted to the Company;
- Customer's complete correspondence address;
- Loan number in case of a borrower and account number in case of a depositor (wherever applicable);
- Registered mobile number / phone number; and
- Email ID (if available) Bank details of the Customer if the Complaint is with respect to updation or rectification of Credit Information.
- Bank details of the Customer if the Complaint is with respect to updation or rectification of Credit Information.

After the complaint is registered with the Company, the complainant will receive a message mentioning the complaint ticket number on the mobile number/email ID provided by him/her at the time of lodging the complaint.

B.Procedure for Addressing a Complaint by the Customer Care Team

The customer care team will follow the procedure outlined below to address and resolve complaints received from all the accepted channels under this Policy.

- First call resolution: For all complaints which can be resolved immediately when raised, the response should be provided as soon as possible, preferably in the same form and on the same channel through which the complaint was received.
- Resolution post-verification: For the complaints which must be verified and may need further investigation and / or support from other departments and hence cannot be resolved immediately, the customer should be informed about the expected timelines of closure. For these complaints, tickets should be raised and assigned to the concerned departments on priority.
- During the time it takes to reach a resolution, the relevant department of the Company will be in contact with the complainant at defined intervals / milestones to communicate the progress on resolving the complaint. In case of any delay envisaged in arriving at a resolution, the customer will be duly informed outlining reasons for the delay.
- Once a resolution has been reached, the customer will be provided with all the information pertaining to the resolution of his complaint including all the supporting documents, preferably in the same form and on the same channel through which the complaint was received.

C. Timeframe for Addressing and Resolving Complaints

The turn-around time for addressing and resolving a complaint will depend upon the type and complexity of the grievance. The timelines for different complaints under this Policy is provided as follows:

- Normal cases (other than the one mentioned below): 7 days of receipt of complaint. Customer complaints relating to interest, EMIs, repossession, penalty and other charges, non-receipt of deposit certificate etc. are some of the types of complaints which will be categorized under this.
- Fraud cases, legal cases and cases which require retrieval of old records and documents: 30 days of receipt of complaint.
- CIBIL-related cases: 30 days of receipt of complaint.

In case after the receipt of complaint from the customer, the Company seeks certain additional information from the customer for proper redressal of the complaint and the customer does not reply within 7 days from the receipt of communication seeking such information by the Company, the Company will treat the complaint as "Closed" and the customer will have to re-open the ticket for seeking resolution of his/her complaint.

If any complaint needs additional time to reach a resolution, the Company will inform the complainant of the requirement of additional time and the expected timeline for the resolution of the issue.

VII. Escalation Process

If the Customer is not satisfied with the resolution or has not received any resolution within a period of 30 days from lodging the complaint, he or she can appeal to the RBI Ombudsman, as per the 'Reserve Bank-Integrated Ombudsman Scheme 2021' ("**Scheme**"), a copy of which has been uploaded on the Company's website.

The Board of Directors shall nominate a Grievance Redressal Officer and Principal Nodal Officer under the Scheme who shall be responsible for ensuring due compliance of this Policy. The information about Grievance Redressal Officer shall be displayed prominently, for the benefit of the customers, at the offices and branches of the Company.

If the customer wants to resolve the matter through internal channels, he or she can raise his or her concerns by following the escalation procedure outlined below. In order to escalate a complaint to the next level, the customer should share the ticket/ complaint number. It is important to note that the turnaround time mentioned against each escalation level is applicable only when the aforementioned escalation matrix is followed.

VIII. Level 2: Grievance Redressal Officer/Principal Nodal Officer

If a customer is not satisfied with the resolution provided by the Customer Care team, the customer may escalate the matter by writing an email or sending a hard copy of the complaint to the Grievance Redressal Officer/Principal Nodal Officer appointed by the Company.

Designation: Grievance Redressal Officer

Address: No.4/363, 2nd Floor, Kandhanchavadi, Old Mahabalipuram Road, Chennai 600096.

E-mail ID: compliance.rbi@orangeretailfinance.com

The contact details of the Grievance Redressal Officer will be displayed on the Company's website and at all branch offices.

The Grievance Redressal Officer will provide the resolution within 7 days of receipt of the escalation.

IX. Level 3: Appeal to the RBI Ombudsman

Under the Scheme, any customer aggrieved by an act or omission of the Company resulting in deficiency in service may file a complaint, personally or through an authorized representative. The following are the conditions under which a customer can file the complaint under the Scheme:

1. The complainant had, before making a complaint under the Scheme, made a written complaint to the Company concerned and:
 - a. The complaint was rejected wholly or partly by the Company, and the complainant is not satisfied with the reply or the complainant had not received any reply within 30 days after the Company received the complaint; and
 - b. The complaint is made to the Ombudsman within one year after the complainant has received the reply from the Company to the complaint or, where no reply is received, within one year and 30 days from the date of the complaint.
2. The complaint is not in respect of the same cause of action which is already:
 - a. 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;
 - b. 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.
3. The complaint is not abusive or frivolous or vexatious in nature.
4. The complaint to the Company was made before the expiry of the period of limitation prescribed under the Limitation Act, 1963, for such claims.
5. The complainant provides complete information as specified in Clause 11 of the Scheme.
6. The complaint is lodged by the complainant personally or through an authorized representative other than an advocate unless the advocate is the aggrieved person.
7. No complaint for deficiency in service shall lie under the Scheme in matters involving:
 - a. Commercial judgment/commercial decision of the Company;
 - b. A dispute between a vendor and the Company relating to an outsourcing contract;
 - c. A grievance not addressed to the Ombudsman directly;
 - d. General grievances against management or executives of the Company;
 - e. A dispute in which action is initiated by the Company in compliance with

- the orders of a statutory or law enforcing authority;
- f. A service not within the regulatory purview of the RBI;
- g. A dispute between the Company and any other Regulated Entity(ies) (as defined under the Scheme); and
- h. A dispute involving the employee-employer relationship of the Company.

The customer can use the following ways to file a complaint under the Scheme.

1. The complaint may be lodged online through the portal designed for the purpose (<https://cms.rbi.org.in>).
2. The complaint may also be submitted through electronic or physical mode to the Centralized Receipt and Processing Centre as notified by the Reserve Bank of India. The complaint, if submitted in physical form (in prescribed format as per the Scheme), shall be duly signed by the complainant or by the authorized representative. The complaint shall be submitted in electronic or physical mode in such format and containing such information as may be specified by RBI.

The Principal Nodal Officer of the Company will be responsible for representation before and furnishing information to RBI Ombudsman with respect to complaints filed against the Company. The resolution of complaints made to the Ombudsman will be as per the guidelines mentioned in the Scheme.

The salient features of the Scheme and details of the Principal Nodal Officer along with details of the complaint lodging portal of the Ombudsman (<https://cms.rbi.org.in>) shall be displayed across all branches and offices of the Company in English as well as the vernacular language of the state in which the office of the Company is situated.

X. Compensation:

The Compensation for

- a. delay in resolution for updation/ rectification of credit information;
- b. delay in release of movable/immovable property documents;

shall be computed and paid to the customer according to the RBI framework for compensation to customers for delay as enforced from time to time.

XI. Sensitizing Operating Staff for Improvement in Service & Handling Complaints

The Company understands the importance of creating awareness amongst the staff to handle customer complaints / grievances with courtesy, empathy and promptness. Training programmes / conferences to raise awareness about the pattern of complaints including the root causes, remedial measures, etc., among the frontline staff, in order to evolve consistency in handling of complaints shall be conducted at regular intervals.

XII. Reporting

- All complaints received by the Company will be tracked, consolidated and recorded for end-to-end resolution.
- All complaints will be reported to the concerned authorities in the prescribed format as per the applicable laws/ guidelines/ directives, including modification(s) thereof, from time to time.
- The complaint MIS shall be presented to the Customer Service Committee of the Company for review on a quarterly basis.

XIII. Review of the Policy

The Customer Service Committee shall review the complaints received on a quarterly basis and the suggestions of the Internal Ombudsman and make necessary changes as required in the Policy for making the process more effective.

The board of directors of the Company shall annually review the functioning of the grievance redressal mechanism.
