Grievance Redressal Mechanism

of

Techfino Capital Pvt. Ltd.

Grievance Redressal Mechanism

1. Description of the policy framework

   The policy framework lays down requirements related to grievance assessment, registration of complaints, escalation of complaints, redressal, resolution of complaints and periodic review of records.

2. Objective of the Code

   The purpose of the current policy is to ensure that:

   a. All customers are always treated fairly and without bias.
   b. All issues raised by the customers are dealt promptly with courtesy and resolved on time.
   c. Customers are made completely aware of their rights so that they can opt for alternative remedies if they are not fully satisfied with the response or resolution to the compliant.

3. Principles of Grievance Redressal

   a. Customers will be provided with information on how to raise their grievances on phone, on website or through any other means.
   b. The process to raise a complaint/escalation/grievance would involve only relavant investigative questions without any kind of hassle to the customer.
   c. Resolutions would follow the simple principle of ensuring an effective resolution. The responses would be consistent with the RBI guidelines at all times as applicable to mitigate impact on customer on account of the grievance.
   d. The company is committed to remain quick and consistent at all times in providing necessary information or process requested by the customer.

   e. Customers will be provided with information

4. Responsibilities of the Board

   a. To lay down the appropriate grievance redressal mechanism with the organization which ensures that all disputes arising out of the decisions of Company functionaries are heard and disposed of at least at the next higher level.

   b. Periodically review the functioning of the grievance redressal mechanism at the various levels of management.

   c. Review of consolidated report of such reviews as shall be submitted to the Board at regular intervals, as may be prescribed by it and calibration of this Policy.

5. Registration of Complaints

   There is a three level Grievance Redressal Mechanism (including the escalation matrix) to resolve any of the customer grievances with regard to ‘deficiency in service‘ on the part of Techfino Capital Private Limited (the “Company” or “Credit Institution”). Other queries and service requests from customers will not be treated as customer complaints but will be attended to and answered appropriately.

Level 1: Braja Kishore Sahu – Operations Manager

Level 2: Co-Founders
/
Level 3: Ombudsman under RBI Internal Ombudsman Scheme 2021

Details of each of the three levels of Grievance Redressal Mechanism and conditions to be fulfilled before lodging complaints are furnished below:

A) INTERNAL

Level 1: Braja Kishore Sahu – Nodal Officer

The customer may register his/her query/ complaint to the Company which shall be addressed to the Grievance Redressal Officer in connection with any matter pertaining to business practices, lending decisions, credit management, recovery and complaints relating to updation/alteration of credit information.

The details of the Nodal Officer are given as follows:

- Name of the Nodal Officer: Braja Kishore Sahu, – Operations Manager
- Address: DSR Techno Cube BBMN Katha no.639/645/1, Survey No.68, Village, Varthur Road, Next to SKR Kalyan Mantapa, Thubarahalli, Kundalahalli, Bangalore, Bangalore North, Karnataka, India, 560037
- Contact Details (Telephone/Email): +91-9090505696 /customersupport@techfino.in

The Nodal officer may formally delegate the task of redressal of a specific complaint to a team member as suitable, with due information to the customer.

Resolution Deadline: 15 Days

Level 2:
Co - Founders (Customers should not write complaints directly to Co - Founders)

In case, the decisions of the Internal Ombudsman who had examined the complaints which were partly or wholly rejected by Internal Grievance Redressal Officer are not agreeable to the company, such cases will be escalated to the Co - Founders to approve the proposals for rejection of the Internal Ombudsman's decisions.

Contact Details (Email): jayaprakash.patra@techfino.in

Resolution Deadline: 15 Days

B) **EXTERNAL**

Level 3: Ombudsman under RBI Integrated Ombudsman Scheme. The modes of lodging complaints under this scheme other conditions are as under

a) If the customer is not satisfied with the resolution received or if the customer does not hear from us in 30 days, then he/she may lodge their complaint on RBI CMS portal - https://cms.rbi.org.in or reach them on the dedicated e-mail id - crpc@rbi.org.in Or send your complaint form (format available on the website under Ombudsman scheme 2021) to send their complaint in email/physical form to Centralized Receipt and Processing Centre (CRPC) has been set up at RBI, Chandigarh for receiving complaints through physical mode (letter/post). The CRPC undertakes initial scrutiny and processing of these complaints, uploads them on CMS, which are then assigned to Offices of RBI Ombudsmen (ORBIOs) or CEPCs for redressal.

b) For redress of his grievance, the complainant must first approach us If we do not respond within a period of 30 days after lodgment of the complaint or reject the complaint wholly/partly or if the complainant is not satisfied with the response/resolution given by us, the complainant can lodge his complaint under the RB-IOS, 2021.

c) Approaching the RBI Ombudsman without first lodging a complaint with us or doing so before 30 days after lodging the complaint, if there is no response from the RE, would make the complaint non-maintainable under RB-IOS, 2021.

d) It may be noted that the complaint should be made to the RBI Ombudsman not later than one year after receiving the reply of the RE or, in cases where no reply is received, not later than one year and 30 days after the date of the representation to the RE.

Grievance Redressal Mechanism for Co Lending Transactions

The Reserve Bank of India (RBI) issued guidelines on co-lending by banks and Non-Banking Financial Companies (NBFCs) to the priority sector through Circular FIDD.CO.Plan.BC.No.8/04.09.01/2020-21 dated November 15, 2020. These guidelines aim to enhance the flow of credit to underserved and unserved segments of the economy by leveraging the lower cost of funds available to banks and the wider outreach of NBFCs. The framework, referred to as the "Co-Lending Model" (CLM), allows banks to collaborate with all RBI-registered NBFCs, including Housing Finance Companies (HFCs), based on a prior agreement.

The Company shall be the single point of contact for the customers in regards to the co lending transactions. Failure on part of the company to resolve any complaint registered by the borrower within 30 days will provide the option of escalation to the Banking Ombudsman/Ombudsman for NBFCs or the Customer Education and Protection Cell (CEPC) in RBI.

The levels of grievance redressal as specified earlier shall also be applicable to co lending transactions.

Grievance Redressal Mechanism for delayed updation/rectification of credit information

The RBI has implemented a comprehensive compensation framework to address complaints regarding credit information discrepancies vide notification RBI/2023-24/72 DoR.FIN.REC.48/20.16.003/2023-24 dated October 26, 2023. The framework has established a compensation mechanism for delayed updation/rectification of credit information.

With Credit Institution (CI):

- The customer can raise a complaint directly with the CI regarding incorrect or outdated credit information.
- CI shall acknowledge the complaint and update the credit information with the Credit Information Companies CIC(s) within 21 calendar days from the date of being informed.
- The failure on part of the CI to to send updated credit information to the CICs by making an appropriate correction or addition or otherwise within twenty-one (21) calendar days of being informed by the complainant or a CIC will entitle the customer to receive compensation as provided in the "Framework for compensation to customers for delayed updation/ rectification of credit information" as notified by the RBI on October 26th, 2023.
- The details of the grievance redressal officer with whom the customers can raise complaints in relation to updation/rectification of the credit information are as follows:

- Name of the Grievance Redressal Officer: Braja Kishore Sahu, – Operations Manager
- Address: DSR Techno Cube BBMN Katha no.639/645/1, Survey No.68, Village, Varthur Road, Next to SKR Kalyan Mantapa, Thubarahalli, Kundalahalli, Bangalore, Bangalore North, Karnataka, India, 560037

- Contact Details (Telephone/Email): +91-9090505696 kishore@techfino.in

With Credit Information Company (CIC):

- The customer also has an option of raising a complaint directly with the CIC.
- CIC shall coordinate with all concerned CI(s) and ensure resolution within **30 calendar days** from the date of receipt of the complaint.
- The failure on part of the CIC to resolve the complaint within thirty (30) calendar days of being informed by the complainant or a CI, despite the CI having furnished the updated credit information to the CIC within twenty-one (21) calendar days of being informed by the complainant or the CIC will entitle the customer to receive compensation as provided in the "Framework for compensation to customers for delayed updation/ rectification of credit information" as notified by the RBI on October 26th, 2023.

Escalation of Co Lending and Credit Information Complaints

If the customer is not satisfied with the resolution received or if the customer does not hear from us in 30 days in regards to Co lending transactions or Credit Information complaints , then he/she may lodge their complaint on RBI CMS portal - https://cms.rbi.org.in or reach them on the dedicated e-mail id - crpc@rbi.org.in Or send your complaint form (format available on the website under Ombudsman scheme 2021) to send their complaint in email/physical form to Centralized Receipt and Processing Centre (CRPC) has been set up at RBI, Chandigarh for receiving complaints through physical mode (letter/post). The CRPC undertakes initial scrutiny and processing of these complaints, uploads them on CMS, which are then assigned to Offices of RBI Ombudsmen (ORBIOs) or CEPCs for redressal.

Privacy and Confidentiality

All grievances and related information submitted by complainants shall be treated as strictly confidential. Any personal data, documents, or details shared during the grievance process shall be collected, used, and retained solely for the purpose of resolving the grievance in accordance with applicable data protection and privacy laws. Such information shall not be disclosed to any third party without the complainant's consent, except where required by law or regulatory authority.