SWARA
FINCARE

Customer Grievance Redressal Mechanism Policy

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Name	Title	Signature	Date
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Introduction

Swara Fincare Limited (SFL) is dedicated to provide the highest quality of services to the customers. In the present scenario of competitive market, excellence in customer service is the most important tool for sustained business growth. Swara Fincare Limited believes in having a strong mechanism for recording and responding in a timely manner to queries and complaints of its clients. The company believes that providing prompt and efficient service is essential not only to attract new customers, but also to retain existing ones. For the purpose, Swara Fincare Limited maintain a strong Customer Grievance Redressal Mechanism (CGRM) policy for the timely and prompt grievance redressal of the customers.

Objective

We believe that customer service is an important imperative for sustained business growth, and we want to ensure that our customers receive exemplary service across different touch points of the company. The basic objective of the policy to provide prompt and hassle-free service to retaining existing relationships and customer satisfaction.

Customer query and complaints constitute an important voice of customer, under this policy details complaint handling through a structured grievance redressal framework. Complaint redressal is supported by a review mechanism, to minimize the recurrence of similar issues in future.

The Company's Grievance Redressal Mechanism Policy fulfils the following principles:

- To provide the best customer service support by adhering to laid down procedure.
- Complaints and queries raised by customers are dealt with courtesy and in a timely manner.
- Customers are Informed, the way to escalate their complaints within the organization, and their rights if they are not satisfied with the resolution of their complaints, they followed end to end resolution.
- Better Client Retention.
- Enhancement of brand loyalty.
- Compliance to regulation.

Definitions

A "Grievance/Complaint" Is an expression of dissatisfaction with a product or service, either orally or in writing, from a customer. A customer may have a genuine cause for complaint, although some complaints may be made as a result of a misunderstanding or an unreasonable expectation of a product or service.

Applicability of the Policy

This Policy is applicable to all customers of Swara Fincare Limited (SFL). For the queries, this policy is helpful to our prospective customers.

Display of Information

At the operational point of view, the company shall ensure to display the following information prominently at all business places where a customer can register his/her queries or complaints in such manner.

As per Para No. 16.5 of RBI Circular No. DBR No. Leg.BC.21/09.07.006/2015-16 dated 1st July 2015, following information will be displayed by Swara Fincare Limited.

Branch Display

- List of officials with name, address and contact details who can be addressed their complaints.
- Name, contact number and Email ID of the concerned Principal Nodal Officer (PNO) appointed by the company.
- Toll free Number and head office number of the company.
- Complaint registers at branch and regional offices.

Website Display

- Names and other details of the officials at the Head Office/Regional Offices/Zonal Offices who can be contacted for redressal of complaints including the names of the Nodal Officers/Principal Nodal Officers. The details of the Principal Nodal Officer will be prominently displayed in the portal of the Company website.

Reporting to Board of Directors

A summary of all the complaints along with actions initiated would be reported to the board during each quarterly board meeting. The report shall contain information like, the total number of complaints received, resolved and pending, with reasons thereof, so that the board can appraise and guide for best practices on grievance redressal to enable customer centric organization.

Customer Grievance Redressal Process

All queries/complaints arising out of the decisions of the Company's functionaries would be heard and disposed of at least at the next higher level after it is brought to their notice. Therefore, the following 'Grievances Redressal Mechanism' is put in place.

Step 1: Branch/Region where Business is transacted Level Review

A customer or his/her representative should either make a written complaint addressed to the relevant Relationship Manager or Branch Manager (contact details for the Company's branches/regions where business is transacted are on the Company's website), call the Company at [+91 – 9810970292], or email the Company at contact us at customercare@swarafincare.com with:

- Account number/Loan ID
- Brief summary of complaint
- Complete name/contact address/phone number of the complainant

The branch/region where business is transacted will strive to provide an initial response to the customers complaint within 7 days of the complaint being lodged.

Upon receipt of the complaint, the executive register the complaint and speaks to relevant stakeholders namely Relationship Manager/Regional Head to validate query/complaint raised by the complainant. If the complaint genuine and which needs immediate redressal at the next immediate level and ensure timely redressal of the complaint by taking help from the RM/BH. Depending on the

severity of the complaint, it is escalated to the next level, who then follow ups with the line departments to resolve the complaint.

The queries/complaints received are classified in the following categories.

Complaints	Pending insurance claims
	Legal Notice complaints
	Related to staff behaviour/performance
	Third party products complaints
	Loan Rejection
	Credit Bureau Issues
Query	New/Next cycle loan
	Contact information of field staff
	Information regarding death claim
	Loan product information
	Third party products queries
	Legal Notice queries

The HO team maintain a call log/control sheet of all the calls received on the toll free number in excel format, where all the details of the query/complaints with the subsequent escalation and action taken to resolve the grievance.

Further, complaints registered at the branch or region office are also shared by the field team with HO team to take the required follow up on these cases to resolve them. Status of all cases need to updated in the call log.

Step 2: Grievance Redressal Officer (GRO) Review

In case the customer is not satisfied with the response received at Step 1, i.e., the branch or redressal team, he/she can escalate the complaint to Swara's Grievance Redressal Officer (GRO), whom the Company has appointed for the implementation of customer service and complaint handling. The Grievance Redressal Officer's complete contact details are given on the following page:

Mr. Mukund Madhav
Address (office): 3rd Floor, Plot No - 4112, Ashoka Marg, Sector - 27, Gurgaon, Haryana, India, Pin Code - 122009
Email id: mukund@swarafincare.com
Landline No: 0124 - 4238016

The Grievance Redressal Officer can be contacted during office hours (9:30 a.m. to 5:30 p.m.) on any of the working days of the Company.

Once the complaint is escalated, the complaint will receive a response within 7 working days of it reaching the Grievance Redressal Officer.

Step 3: Chief Executive Officer (CEO) Review

In case the customer is still not satisfied with the response or has not received a response from the Company within 21 days from the date of his/her initiated complaint, he/she may contact the Company's Chief Executive Officer at the email id dev.verma@swarafincare.com or 0124 – 4238016.

Categorisation of time frame

To register complaints, customers should follow the steps mentioned above. Once the complaint has been received in writing, the company will send an initial response within 7 days. After the matter is reviewed a final response will be sent to the customer within a period of two (2) weeks and within a maximum period of four (4) weeks of receipt of such compliant/grievance. If more information is required by the Company to resolve the complaint, the Company will appropriately inform the complainant. Once the additional information is received, the final response will be issued within 7 days of such receipt.

If the complainant is not happy with the resolution of the complaint, the complainant can escalate the matter to the Grievance Redressal Officer at the coordinates given in section 3 above. The Grievance Redressal Officer will seek to respond to the complaint within 7 days of the complaint being escalated to him/her.

Escalation of Complaint to Reserve Bank of India

In case the complainant does not receive a response from the Company within a reasonable time of one month or if a customer is dissatisfied with the response received at all levels, the complainant may approach the Reserve Bank of India at the following address:

The General Manager,
Reserve Bank of India,
DNBS, Mumbai Regional Office, RBI Building, 3rd Floor, Opp. Mumbai Central Railway Station,
Mumbai-400008. Tel: - 022 23084121, E-mail- helpdnbs@rbi.org.in

The Complaint can also be e-mailed to helpdnbs@rbi.org.in with a copy to Swara's Chief Executive Officer

Awareness of the Grievance Redressal mechanism

At Swara, Customer Delight is our priority, and we are committed to provide our customers best in class experience. If customers are happy with our services, we would love to hear from them. Similarly, customer feedback helps us strengthen things that we are doing well and at the same time improve on areas where we need to do better.

The customer can record their grievances / provide their feedback in writing or verbally. The customer can approach our branch office to register a complaint through any of our service touch points given hereunder and expect a response within 10 days of complaint registration.

Tracking and Reporting

- All complaints will be registered in a central complaints management system of the Company. Complaints will be assigned a unique reference number which will be communicated to the complainant along with an appropriate turnaround time. In case the resolution needs additional time, an interim response shall be sent to the complainant.

- All complaints shall be monitored at appropriate levels and marked as closed only after resolution of the customer grievance and due communication to customer.

- The complaints database, along with the acknowledgement letter and other correspondence will be preserved at least for 10 years for future reference.

Training on handling complaint

Swara Fincare Limited shall impart training on an ongoing basis to all employees on handling complaints/ redressal of grievances/ customer counselling.

Review of Policy

A consolidated report of periodical review of compliance of fair practice code and functioning of the grievance's redressal mechanism at various levels of management shall be submitted to the Board / Committee of Directors at annual intervals. The reviews shall consider the following:

a) Internal factors such as changes in organisational structure or products or services offered.
b) External factors such as changes in legislation or technological innovation.
c) The overall performance of the complaint management system, and
d) The results of audit, if any conducted during the year by internal / external auditors.

Document Control

Operation department will be the custodian of this policy.

The contents of this Policy are confidential and are intended for internal use by Swara Fincare only. This Policy should always be kept in a safe place and must not be copied or revealed to third parties (i.e., persons not employed by Swara Fincare) without the express written permission from Compliance Department.

Distribution of this Policy, in whole or in part, should come through an official request to the Head of Operation department

Annexure – A

Customer Escalation Matrix

The queries/complaints related matter can be escalated as per the matrix shown below:

Escalation Level	TAT	Contact Person's Name & Designation	Contact Details
1	3 days	Relationship Manager / Branch Head	Displayed at branch office
2	7 days	Customer Care Help Desk	Customer Care Executive - +91 – 9810970292
3	15 days	Mr. Mukund Madhav, Grievance Redressal Officer (GRO)	Address (office): 3rd Floor, Plot No - 4112, Ashoka Marg, Sector - 27, Gurgaon, Haryana, India, Pin Code - 122009 Email id: mukund@swarafincare.com Landline No: 0124 - 4238016

4	21 days	Mr. Dev Verma, Chief Executive Officer (CEO)	dev.verma@swarafincare.com or 0124 – 4238016
5	30 days	Reserve Bank of India (RBI)	The General Manager, Reserve Bank of India, DNBS, Mumbai Regional Office, RBI Building, 3rd Floor, Opp. Mumbai Central Railway Station, Mumbai-400008. Tel: - 022 23084121, E-mail- helpdnbs@rbi.org.in