Client Grievance Redressal Policy

Digamber Capfin Limited

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1. Introduction

We at Digamber Capfin Limited, believe in providing the highest quality of services to our clients. To accomplish this, we have started a dedicated client Grievance Cell to timely and efficiently address the grievances of its customers.

In this regard, we have established a Client Grievance Redresaal Mechanism Department (CRGM) to include Greivance Redressal Team (GRT), Grievance Redressl Officer (GRO) and appointed a designated Nodal Officer, who takes up client complaints by taking necessary steps and thereby complies to the regulatory requirement including as prescribed in the Fair Practice Code (FPC) of RBI.

2. Scope, Responsibility and Objective

The grievance redressal process has been defined to address the grievances of all our customers. Attending to the enquiries and requests of our customers are also included under the scope of Grievance Redressal Policy. Staff members at all levels and Grievance Redressal Team are duty bound to address the concerns of our customers.

The objective of the policy is to spell out the framework for Grievance Redressal in the company as outlined in the Fair Practice Code and other relevant circulars issued by Reserve Bank of India from time to time to ensure that:

a) All customers are treated fairly and in an unbiased manner at all times
b) All issues raised by customers are dealt with courtesy and resolved on time
c) Customers are made completely aware of avenues to escalate their grievance within the company and their rights to alternate remedies if they are not fully satisfied with the response or resolution to their grievance
d) The employees shall work in good faith and without prejudice towards the interest of the customer Through this policy, the company shall ensure that a suitable mechanism exists for receiving and addressing grievances from its customers

3. Governance of Customer Grievance/Complaint Redressal

i. Role of Board of Directors

The Board of Directors is overall reviewer of the Grievance Redressal process of the company. The Board of Directors every quarter reviews the action taken by the Client Grievance Redressal Committee duly constituted by the Board of Directors through the minutes and details of action taken by Client Grievance Redressal Committee.

ii. Client Grievance Redressal Committee (CGRC)

CGRC meets at least once in a quarter and reviews each and every complaint received and action taken by Grievance Redressal Team (GRT), Grievance Redressal Officer (GRO) and Principal Nodal officer on the same.

CGRC also notes the report on monthly meeting of top management personnels on client grievance redressal matters.

CGRC approves the amendments in Client Grievance Redressal Policy to ensure the correctness and adequacy of the matters written in the Policy. The CGRC also review the compliance of the Client Grievance Redressal Policy once in a year.

The CGRC also take note of Root Cause Analysis on all the complaints received and suggest for the corrective action for the same (if any).

The CGRC also reviews customer complaint monitoring mechanism as well to check the timely and effective redressal of each and every complaint.

Detailed minutes of Client Grievance Redressal Committee are being discussed and noted by the Board of Directors every quarter in its meeting.

iii. Senior Management

Senior Management persons including the Whole Time Director (WTD), Principal Nodal Officer and Grievance Redressal Officer meet every month to discuss the matters related to Client grievances received during the previous month. The meeting discusses the following aspects:

i. All grievances, requests and queries received during the month
ii. Correctness of classification of matters in Compliant, queries and request
iii. sufficiency of action taken for redressal of complaints
iv. Root Cause Analysis of all the complaints received and suggest the action to be taken to restrict the repetition of the same complaint.
v. Monitoring mechanism of complaint received

A report on above matter signed by PNO is being placed during the above monthly meeting.

The report of above monthly meeting is being reviewed, discussed and noted by the Client Grievance Redressal Committee once in a quarter

Following Senior Management persons are responsible under the Client grievance redressal and complaint monitoring mechanism:-

S. No.	Senior Management Person	Responsibilities
1	Whole Time Director (WTD)	Reviewing the client grievance redressal process and action taken on grievances received on monthly basis during the monthly meeting.
2	Head-HR	For training on dealing with the borrowers and for setting accountability of the employees based on the facts of the matter as per the Staff Accountability Policy
3	Chief Compliance Officer	For taking care of the compliance of applicable regulations on the client grievance redressal mechanism of the company
4	Chief Business Officer	Ensuring the Business Conduct as per fair practice code
5	Credit Department	Ensuring credit and ops Conduct as per fair practice code and set guidelines and policies
6	Internal Auditor	Checking the status of the client grievance redressal process and complaint monitoring mechanism adopted by the company and whether the same is as per the policy and SOP related to the matter

Steps taken for improving the process of redressal of the Client Grievance/Complaints

The company has developed and implement following process for the grievance redressal and monitoring of complaints

1. The company has implemented grievance redressal tracking and monitoring system taken from Zoho named Zoho Desk which generates the tickets for the complaints. The system generates the reports and MIS which are being reviewed by the PNO as well as top management during the monthly meetings. The system is also having the maker-checker system.

The ticket generated from the above system are closed only after taking appropriate action on complaint.

The system is also having the feature for re-opening the complaint tickets in the cases where the client is not satisfied with the resolution of grievance provided by the company.

2. As the major matters were related to non-receipt of the No dues Certificates (NDCs) hence the company has activated the system of sending NDCs within 30 days of actual closer of the loan.

3. Branches with foot fall of retail customers has also the offline mode of compliant filing facility through Complaint Form and complaint box. These branches are now displaying the information related to customers rights, complaint process and other financial literacy related material.

4. Modes of receiving compliant and disposal process: -

A. Modes of compliant:

i. Through Calling at Toll Free Number – 18001806365. The records of each and every call is maintained by the Client Grievance redressal team which is being reported to Client Grievance Officer, PNO as well as to top management and Client Grievance redressal Committee.

ii. Through email – clientgrievance@digamberfinance.in

iii. Through web site of the company www.digamberfinance.com which has option of Hindi and English both languages

iv. By sending letter to the head office

v. By going to retail branch of the company (branches with foot fall of customers) and using compliant form and box.

B. The company has appointed Mr. Dharmendra Kumar Jangid, as Principal Nodal Officer who reviews the work of Grievance Redressal officer (GRO) and GRO is having Grievance redressal team under him. Mr. Dharmendra Kumar Jangid is no longer a Chief Credit Officer and is working as Vice President taking care of various operations of the company with no control over the Credit department.

The complaints received are disposed and closed as per following process and TAT:-

A. Within 7 days by the Grievance redressal Team
B. If compliant is not resolved and closed within 7 days of receipt by the Grievance Redressal Team then the complaint is escalated to Grievance Redressal Officer on 8th day of receiving compliant
C. If Grievance Redressal Office does not resolve the compliant within 15 days of receiving compliant by the company then on 16th days the compliant is escalated to Principal Nodal officer who shall resolve the compliant within 30 days of receipt of the complaint by the company.

C. Following is the process of redressal of complaints received at the retail branch of the company:-
i. Customer fills the compliant form and put it in the complaint box available in the branch. An acknowledgement is being given to the customer related to the same.
ii. The branch fills the details of compliant in the compliant register kept at the branch and sends the compliant at clientgrievance@digamberfinance.in on the day of receiving complaint.
iii. within 3 days of receiving the complaint a ticket is being generated and sent to the mobile number given in the compliant form
iv. the compliant is being resolved within the TAT as mentioned above

D. Process of closure of complaint

i. On receipt of the complaint the facts of compliant are being checked and necessary records are also being checked. The compliant is being registered under maker checker concept.
ii. If an investigation is required in the matter keeping in view of the nature of compliant, then the investigating officer (without any conflict of interest) is being appointed within 2 days of receiving the complaint who shall collect necessary evidences and discuss the matter with complainant (wherever required). TAT of submission of report by IO: within 3 days of being appointed as IO.

iii. On the basis of all the information and on the basis of the discussion with customer (wherever done), the compliant is being closed with the permission of Principal Nodal Officer. Written confirmation of closure is also been taken from the customer wherever required.

If the complaint is related to following matters, then the investigation office shall compulsorily be appointed:-

1. Complaint related to misbehavior with client
2. Complaint related to Fraud with client
3. Complaint related to corruption

4. Tenets of grievance redressal:

The company shall be guided by the following tenets in its approach to grievance redressal:

a) Customer Awareness: The company shall endeavor to make continuous efforts to educate its customers to enable them to make informed choices regarding the loan products as well as channels to approach for grievance redressal.

b) Fairness & transparency: The customer's grievance shall be examined in all fairness and the company shall take a balanced approach to resolve the same. company shall ensure customer grievances are resolved in a timely and efficient manner.

c) Training & Development: To enhance awareness about the Grievance Redressal process, the company provide training sessions through SOP & Module to its staff on the grievances procedures and resolution matrix at the time of Induction and also training session on sensitization and behavioral training for staff doing recovery. Also, Disciplinary action framework for misconduct is also being enforced by the company.

d) Escalation: Customer grievances process shall include an escalation matrix mentioning the details of the next level of grievance redressal for the customer.

e) Mystery Shopping: The Company shall conduct mystery shopping exercises, as and when required, to assess the effectiveness of the Client Grievance Redressal Mechanism and to identify any gaps or areas for improvement within the framework.

f) Review: The company shall have a regular process of internal review of customer grievances at multiple hierarchies to enhance quality and effectiveness of customer service.

5. Definition and types of Queries, Requests and Complaints: -

Complaints: It means as an expression of dissatisfaction made to a company related to its products, services or processes, where a response or resolution is explicitly or implicitly expected.

Query/Request: It refers to a request for information or clarification where the customer is not necessarily expressing dissatisfaction but seeking information or guidance.

Matters received from the customers shall be classified into the following category.-. The person authorised by the Nodal Officer under the Client Grievance Redresaal Mechanism (CGRM) shall decide to categories the matter in one of the following category:

S. No.	Matter	Classification & Criteria
A	**No Dues Certificate (NDC) Not Received**	
I	Loan closed but customer didn't get the NDC	Complaint if NDC is not received within 30 days of closure of the loan as per the policy of the company adopted as per the instructions of RBI.

S. No.	Matter	Classification & Criteria
ii	Loan not Closed but customer demanded for NDC	Query
B	**Staff Fraud**	
I	Collected installments from clients but not given acknowledgement to siphon funds into a personal account	Complaint
Ii	Diverted payment into a fake account	Complaint
Iii	Forged signatures or altered documents	Complaint
Iv	Fraud by Staff	Complaint
v	Accepted bribes or kickbacks from clients	Complaint
vi	Field Staff/Branch Manager demanded commission/money to provide NDC	Complaint
C	**Disbursement Details**	
i	Loan is not disbursed on time	Complaint
	Borrower, without verifying the bank statement, raised a complaint that the loan amount was not disbursed	Query
Ii	Disbursement amount is less than the sanctioned amount	Complaint
Iii	Extra Interest charged due to mismatch of date in MIS and actual Disbursement	Complaint
Iv	Asked commission for disbursement	Complaint
V	Amount disbursed but not credited to client's account	Complaint
D	**Staff behavior**	
I	Rude and unprofessional behavior towards borrower	Complaint
Ii	Refused to entertain borrower's queries	Complaint
Iii	Asked commission for getting loan /sanction loan	Complaint
Iv	Misguided clients for adopting unethical practice	Complaint
v	Mis-selling or forced selling of Third-Party products	Complaint
E	**Recovery Practices**	
i	Collection of installments without acknowledgement or sign of loan card, receipt, or SMS	Complaint
Ii	Visiting client's house during off hours for loan recovery	Complaint
Iii	Seized household items of clients for not paying loan installment/coercive recovery practice	Complaint

S. No.	Matter	Classification & Criteria
Iv	Other issues/harassment related to staff/recovery agents	Complaint
V	Fraud in digital transactions by staff/Recovery Agents	Complaint
Vi	Fraud conducted by external agencies with whom company is having any arrangement	Complaint
F.	**Insurance related matter**	
i	Lack of cooperation/support from Field Staff in collecting documents from clients or clients' families	Complaint
Ii	Field Staff asked commission for collecting documents	Complaint
Iii	Delay in sending the collected documents to Head Office for Processing	Complaint
Iv	Delay in processing from Head Office	Complaint
V	Lengthy processes/formalities of Insurance Agencies	Complaint
Vi	Death certificate issue (i.e., documents without a death certificate)	Request
Vii	Delay due to incomplete documents (i.e., blurry documents, inactive bank account, absence of nominee, etc.)	Query. If this is a lacuna from field staff then this will be classified as Complaint
Viii	Claim settled but nominee raised a complaint without verifying bank details	Query
G.	**Credit Bureau Report**	
I	Loan rejection has not been intimated to clients within the specified time	Complaint
Ii	Refused to give reasons for loan rejection	Complaint
Iii	Clients' last installment/EMI not updated to CICs	Complaint
iv	Field staff has given a loan amount to another client	Complaint
v	Wrong reporting in CIC	Complaint
H.	**Interest Rate**	
i	Rate of interest is not written/incomplete disclosure on KFS/Loan Card	Complaint
ii	Charged high interest rates/excessive interest rates	Complaint
iii	Wrong calculation of interest rate	Complaint
iv	Excessive Charges	Complaint
v	Any query or request on interest rate	Query or Request based on the matter
H.	**Others**	

S. No.	Matter	Classification & Criteria
I	Call to know the status of Insurance Settlement	Query
Ii	Enquiry about Digital Transactions	Query
Iii	Request for 2nd cycle loan/new loan not accepted	Query
Iv	Field staff has given her loan amount to another person	Complaint
V	Pending Loan Clarification	Complaint
Vi	Product Clarification/Loan Product Enquiry	Query
Vii	Moratorium Enquiry	Query
Viii	Loan Clearance	Query
Ix	Enquiry on delay regarding delivery of Third-party products	Query
X	Doubt about giving installment amount	Query
Xi	Request for additional loan	Request
Xii	Wrong mobile number updation	Complaint
xiii	Any other matter	Classification will depend on the nature of matter raised by the customer

While the appropriate action will be taken for redressal of all the client grievances but request and queries shall also be resolved and may be used for improving the quality of services of the company.

6. Guidelines for identification of Multiple/Duplicate Complaints;

To ensure efficient and transparent Client grievance resolution, the following guidelines shall be followed for identifying and addressing multiple or duplicate complaints submitted in the company;

- **Complaints shall be considered duplicate if:**
  - They are raised by the same client regarding the same issue or incident.
  - The subject matter, facts, and resolution sought are identical or substantially similar.
  - They are received through multiple channels (e.g., email, portal, phone) without new information or escalation.
- **Complaints shall be considered multiple if:**
  - They relate to the same underlying issue but provide additional or updated information.
  - They are submitted as follow-ups before closure of the original complaint.

In case where any ticket is closed and customer is not satisfied then same ticket shall be re-open

7. Procedure for raising and handling of grievance

7.1 Channels available for customers to contact Digamber Capfin Limited for complaints/ requests/queries

1. Through walk-in at the branch office of the company (the branch officials will immediately facilitated to intimate the Customer Grievance Team at Head Office regarding the grievance/compliant from the customers & accordingly complaints checked and resolved.
2. Call Toll free no. i.e., 1800-1806-365
3. Through Email: clientgrievance@digamberfinance.in
4. Write a letter to head office address mentioned in loan card
5. Through website of the company

Any of the customers having any grievance against our staff or our services can take up the same by calling our Toll-free Number 1800-1806-365 or write an email to clientgrievance@digamberfinance.in or address a letter to:

To,

The Principal Nodal officer,
Mr. Dharmendra Kumar Jangid (Vice President)
C/O Digamber Capfin Limited
J 54-55, Anand Moti, Himmat Nagar,
Gopalpura, Tonk Road, Jaipur - 302018, Rajasthan

Customer Awareness Measures: The toll-free number along with the communication address has been printed in the loan card issued to customers. Details of Grievance Redressal channels and Client Grievance Redressal Module are also published on the company's website as well as displayed on the notice boards at branches and Head Office. Additionally, information regarding the channels available for reporting grievances is communicated to all customers through Center Meeting or personal training session. If a customer wishes to withdraw his/her complaint, he/she must preferably communicate the same to the Company in writing—via letter, email, WhatsApp, or through the mode that maintains a record of the complaint trail.

Following are the list of documents to increase Customer Awareness:

a. Loan Card
b. Company's official website
c. Display Notice board at H.O. & Branch Offices
d. Center Meeting

The company will prominently display the name and contact details (Telephone/mobile number and E-mail ID) of the Principal Nodal Officer along with the details of the complaint lodging portal of the Ombudsman (https://cms.rbi.org.in) at the website and branches/places where the business is transacted, for the benefit of the customers.

Maximum Turn Around Time for redressal of grievances/complaints of the customer: All Grievances that are escalated to or directly reported to Grievance Redressal team at Head Office or otherwise shall be resolved within a TAT of 30 days of receiving the complaint. In case the facts of complaints are receive in parts then 30 days shall be counted from the date of receipt of last information or fact.

7.2 Process to be followed for Client Grievance: -

To enhance borrower resolution and streamline the grievance redressal process, a centralized Complaint Management System (CMS) has been implemented to digitally capture, track, categorize, and provide resolution of complaints to complainant through Email and maintained the acknowledgement of the same .

In addition, the Company has established a Client Grievance Redressal Mechanism (CGRM) Department, wherein the Grievance Redressal Team (GRT) acting as the first level of the Client Grievance Redressal framework.
The Client Grievance Redressal Mechanism (CGRM) department is responsible to adhere the standard operating procedure (SOP) to ensure timely resolution of all complaints including issuance of NDC within 30 days from the closure of loan, Interest Rate issue, Loan information and other complaints received by company.
The Client Grievance Redressal Mechanism (CGRM) Department follows a defined process to resolve complaints, starting from the receipt of the grievance through to its final resolution.

1 Step by step process to be adopted for Redressal of complaint (SOP);

Grievance redressal team (GRT) checks the category of grievance received from the channels of complaints and update the same in CMS portal to generate the ticket.

GRT provide the acknowledgment of receiving grievance to the borrower through ticket generation. (only in case of complaints receive from email)

GRT address and resolve the query or request, communicate the resolution to the borrower, maintained documents and subsequently close the query or request.

In case of any compliant the following process is undertaken-

1. In case customer wish to close the complaint by verbal communication then center team shall call and keep the information regarding such confirmation in register.
2. GRT will receive the complaint from the channels of complaints and acknowledge the same to the customer within 24 hours of receiving the compliant.
3. GRT will ensure that recording of call received from the complaint is stored under the system if recording function is activated.
4. GRT will verify the complaint under the system and check whether it is multiple or duplicate complainant filed as per the guidelines mention under point no. 5 above and intimate the resolution to borrower within 24 hours of receiving the compliant.
5. GRT will check the details of the customer in the system and verify their loan documents and other details.
6. GRT will try to resolve the matter to the best of their ability as per the process.
7. If GRT is unable to resolve the complaint within TAT period of 7 Days, escalate to Grievance Redressal officer for further processing.
8. For severe matters like fraud/Demand of commission or misbehavior the same will be informed to the Grievance Redressal Officer and Principal Nodal Officer and on the basis of that Grievance Redressal Officer (GRO) will take appropriate action on it and report to PNO on regularly basis. Such severe matters can be closed by PNO only after ensuring necessary action regarding closure. If required, an Investigating officer will be designated to investigate the matter by GRO.

   If GRO is unable to close the complaint with the TAT period, then complaint shall be escalated to the PNO and PNO will take appropriate action on this.

Based on the report the action will be taken and the same will be notified to the customer and accordingly MIS and Grievance Fact sheet shall be prepared and maintained for the purpose.

The maximum time to resolve complaint is 30 days.

Matrix for Redressal of Complaint:

The Company has implemented a Centralized Compliant Management System to digitally capture, track, categorize, and sent the resolution of the compliant through automated route to borrower. The system is also generating MIS and providing a consolidated view of complaints. The CMS software sent an alert notification to Client Grievance Redresaal Mechanism Department (CRGM) whenever an email is receive at clientgrievance@digamberfinance.in.

In addition, the Company has adopted an Escalation Mechanism Matrix for effective and structured resolution of complaints, as outlined below:

Escalation of grievances: The company has a three-tier escalation mechanism for customer grievances, as given below:

(i) 1st Level: Grievance Redressal Team (GRT)
(ii) 2nd Level: Grievance Redressal Officer (GRO)
(iii) 3rd Level: Principal Nodal Officer (PNO)

1st Level: Grievance Redressal Team (GRT)- Within 24 hours of receiving of complaint GRT sent acknowledgement of receiving of complaint (in case it is through email) to customer and within a period of Seven (7) days from the date of receiving a complaint, initiate the process to identify, analyze, and provide an appropriate resolution in accordance with the established procedures.

2nd Level: Grievance Redressal Officer (GRO): If GRT is unable to resolve the complaint within the prescribed TAT, the Grievance Redressal Officer (GRO) is allocated a Turnaround Time (TAT) from 8 to 15 days after receiving the complaint to address and resolve the complaint in a timely manner, in accordance with the defined process. The GRO is also responsible for updating the Principal Nodal Officer (PNO) on the status of the complaint.

3rd Level: Principal Nodal Officer (PNO): The Principal Nodal Officer (PNO) will review the current status of the complaint and ensure its closure within 30 days. The Principal Nodal Officer (PNO) will also take appropriate action on complaints received from the GRO, as well as in severe matters like fraud/demand of commission or misbehaviour and severe matters can be closed by PNO only. The unresolved complaints shall be escalated to the PNO on 16th Day.

GRT, GRO shall be required
After the completion of the process or Investigation, the closure remarks have been mentioned in CMS software to provide timely response to the complainant. (in case of Complaint receive through email only)

GRT will prepare a MIS on daily basis and Grievance Fact Sheet on quarterly basis to summarizing the key details complaint on the basis of CMS software records and the register maintained by it and resolution provided to the borrower. Grievance fact sheet will be reviewed and signed off by the Grievance Redressal Officer (GRO) and the Principal Nodal Officer (PNO) to formally record the status of the grievance. (Performa of Grievance fact sheet is annexed as annexure-1). The frequency of Grievance fact sheet shall be quarterly & the same shall be submitted to CGRC.

Mode of response: Company shall ensure that the mode of response is as per the mode of customer intimation received e.g., cases received through e-mail shall be responded though e-mail and if received through telephonic call then response will also be given through telephonic call. However proper records in register shall be maintained for this.

Recording, Reconciliation and Reporting of Complaints Received Through External Channels

All customer complaints received through Credit Information Companies (CICs), the Office of the Ombudsman and other applicable external channels shall be recorded in the Company's centralised Complaint Management System (CMS), irrespective of the channel through which they are received.

The Client Grievance Redressal Department shall periodically reconcile complaints received through these channels with CMS records to ensure completeness, accurate classification and timely resolution.
Before finalisation of regulatory returns and Annual Report disclosures, the complaint statistics shall be reconciled with the records of all applicable grievance channels. The consolidated complaint position, including CIC and Ombudsman complaints, shall be reviewed by the Client Grievance Redressal Committee.

8. Monitoring the quality of the process adopted for Closure of grievances & their categorization

According to RBI Circular RBI/2025-2026/ CO.CEPD.PRS.NO./S226/13-01-008/2025-2026 dated June 03, 2025, Company is require to conduct a monthly review meeting on or before 14th day of succeeding month under the chairmanship of Whole-time Director along with the Principal Nodal Officer and other respective person to examine and oversight the quality of resolution process adopted to close customer complaints. The objective of this exercise is to identify areas for improvement and to formulate appropriate plans or policies aimed at strengthening the Customer Grievance Redressal Framework, with a focus on enhancing efficiency, accountability, and overall customer satisfaction.

In compliance with the said guidelines, the members of the meeting shall review and analyze the summary of customer grievances received during the respective period. The discussion will focus on identifying key factors contributing to the grievances, the processes adopted for their resolution, timelines involved and escalation rate impacting the status of complaints.

As part of the monitoring process, the members of the meeting ensure that an Internal review monitoring on grievances by the GRT & GRO is being done on daily basic and report of the same to the PNO. A report on the Internal review of Daily monitoring require to submitted in Monthly review meeting for the discussion.

The member of the meeting review the customer grievance summary, report of the daily internal review monitoring and provide necessary directives to the Client Grievance Redressal department.

A detailed report outlining the discussions held during the said meeting shall be prepared and submitted to the Client Grievance Redressal Committee on a quarterly basis for their review.

The Internal Audit Department is responsible for monitoring the Client Grievance Redressal Framework and assessing its effectiveness. It shall conduct a bi-annual audit covering complaint classification, root cause analysis, and the adequacy of complaint closures. Additionally, the Internal Audit Department will review the Client Grievance Redressal Policy on an annual basis.

The audit findings and analysis shall be presented to the Client Grievance Redressal Committee for their review and consideration.

8.1 Review & Oversight of monitoring customer grievances:

The Company shall constitute a Client Grievance Redressal Committee responsible for reviewing and overseeing the detailed reports of the Monthly Review Meetings, the Internal Audit Department's report on the grievance redressal mechanism, and the overall Customer Grievance Redressal Framework including Grievance fact sheet of the Company. The Term of reference (TOR) to constitute members of the committee, quorum, meeting frequency and other details of Client Grievance Redressal Committee is annexed as annexure-2. The Committee shall also review and take note of all grievances received at least once in a quarter.

The minutes of the Client Grievance Redressal Committee will be placed before the meeting of the Board of Directors of the company once in a quarter along with the quarterly MIS report on the client grievance redressal.

The client grievance redressal committee, as a part of its monitoring, shall perform the following activities: -

a) Analyze/conduct a root-cause analysis of the complaints logged in the company on a half yearly basis. The analysis shall be carried out basis the nature and type of complaint with a view to identify areas of complaints which are endemic in nature and require process review , resolution provided, multiple/ duplicate complaints, resolution period and other related factors.

b) The analysis shall also include review of detailed report of the discussion held during the monthly review meeting to monitoring the quality of closure of complaints (adequacy of closure as well as timeliness), Internal Audit findings, and on Mystery shopping exercise conducted (if any). Key aspects of the analysis shall be duly highlighted and recorded in the minutes of the Client Grievance Redressal Committee meeting and will be placed in board meeting on annual basis.

c) Summary of the complaints received and closed shall be reported as part of calendar of reviews.

Role of Compliance Department

Pro-active monitoring by the Compliance Department shall be carried out at a monthly frequency on sample basis for frequent areas of complaints to raise issues to the concerned units including for cases not resolved or inadequately resolved or incorrectly logged.

Compliance department to ensure that a monthly report of closed complaints shall be placed before the meeting held under the chairmanship of Whole-Time Director (WTD) to review and analysis the quality of closed complaints.

9. Framework for resolution of complaints and compensation in case of delayed updation/rectification of Credit Information of customers

1. According to RBI Circular RBI/2023-24/72 DoR.FIN.REC.48/20.16.003/2023-24 dated October 26, 2023, any complainant, whose complaint is regarding updation/rectification of credit information, is entitled to a compensation of Rs. 100 per calendar day in case their complaint is not resolved within a period of 30 calendar days from the date of initial filing of complaint.

2. A complainant may request a Credit Information Company (CIC) or Digamber Capfin Limited (the Company) to update the credit information by making an appropriate correction, addition or otherwise and on such request the company or CIC shall take steps to update the credit information within 30 days after being requested to do so.

3. The company may receive any complaint from the complainant directly or forwarded by Credit Information Company (CIC) by way of mail or CIC portal.

4. After receiving the complaint regarding the inaccuracy in the credit information, company shall resolve the same and shall forward the correct particulars to the concerned CIC within a period of 21 days from the date of receipt. Failing to do so, company is liable to pay a compensation of Rs.100 per calendar day.

5. The credit team will share the details of the complaint along with reason for delay in resolution to the principal Nodal Officer. Post his approval the compensation amount will be credited to the complainant bank account within 5 working days of the resolution of complaint.

6. The concerned CIC and company collectively has time limit to resolve or dispose off the complaint within 30 days of receiving the complaint (i.e. CIC shall get remainder of 9 days for complete resolution of compliant).

7. The complainant will be informed of the action taken on the complaint in all cases, including the cases where the complaint has been rejected along with the reasons for rejection, if any.

8. Where the complaint has been received and registered by the company and there has been a delay in the resolution of the complaint, the company shall inform the concerned CIC and the complainant after final resolution, regarding total delay (in calendar days) and the amount of compensation to be paid by the company and/or CIC(s).

9. The company will send alerts through SMS/ email to customers while submitting information to concerned CIC regarding default/ Days Past Due (DPD) in existing credit facilities, wherever the mobile number/email ID details are available.

10. The date of resolution of the grievance shall be the date when the rectified Credit Information Report (CIR) has been sent by the company or CIC to the postal address or Email ID of the complainant.
11. At the time of registering the complaint, the following details along with basic details of the complainant such as
    - contact number,
    - email ID,
    - bank account details or Unified Payment Interface (UPI) ID

    shall be mentioned for crediting the compensation amount, if any. The onus of providing the accurate details will lie with the complainant and company shall not be held responsible for any incorrect information provided to it.

12. The complainant can approach RBI Ombudsman, under the Reserve Bank -Integrated Ombudsman Scheme, 2021, in case of wrongful denial of compensation by the company or CIC.

13. In case of wrongful denial of compensation by company the complainant can approach Consumer Education and Protection Cell (CEPC) functioning from Regional Offices (ROs) of Reserve Bank of India.

14. The company shall undertake Root Cause Analysis(RCA) of customer Grievances at least on half yearly basis. The top management of the company shall review the analysis of RCA at least on annual basis.

Nodal Point of Contact for CICs

The company have a dedicated nodal point of contact for CICs for redressal of customer grievances related to credit information. The details of the nodal point are as follows: -

Name: Mr. Dharmendra Kumar Jangid
Designation: Vice President
Email ID: bureau@digamberfinance.in
Contact No.: +91-9773325238

The aforesaid information is furnished to the CICs and any change therein shall be intimated to the CICs within 5 calendar days of such change.

Grounds for Non-maintainability of Compensation Framework

The compensation framework shall not be applicable in the following cases:

(i) Disputes for which remedy has been provided under Section 18 of CICRA, 2005. The Section 18 of CICRA, 2005 provides that for disputes arising amongst, CICs, company, borrowers, and clients on matters relating to the business of credit information and for which no remedy has been provided under CICRA, 2005, such disputes shall be settled by conciliation or arbitration as provided in the Arbitration and Conciliation Act, 1996.
(ii) complaints/ references relating to
    (a) internal administration,
    (b) human resources,
    (c) pay and emoluments of staff, and
    (d) references in the nature of suggestions and commercial decisions of the CIC/CI.
(iii) complaints pertaining to disputes/ grievances regarding the computation of the credit score/ credit score model.
(iv) complaints that have been decided by or are already pending in other for a such as Consumer Disputes Redressal Commission, Courts, Tribunals, etc
(v) Any other reasons

10. Things to be done when complaint is not resolved within 30 days: -

Escalation channel & Matrix

If the resolution is not provided within 30 days from raising the grievance or if the complainant is not satisfied with the resolution provided to him/her, then he/she can escalate the same to:

1. Sa-dhan Grievance Redressal Cell Mr Ardhendu Nandi
Grievance Redressal Officer (GRO)
Website- sro@sa-dhan.org
Office : A1 - 226, 1st Floor Safdarjung Enclave, New Delhi

2. **RBI - Ombudsman**
The Ombudsman
Centralized Receipt and Processing Centre (CRPC)
Reserve Bank of India,
Central Vista, Sector 17,
Chandigarh – 160 017
Email – crpc@rbi.org.in
Web: https://cms.rbi.org.in

Digamber Capfin Limited

Address: J 54-55, Anand Moti, Himmat Nagar, Gopalpura, Tonk Road, Jaipur-302018, Rajasthan.