Client Grievance Redressal Policy

Digamber Capfin Limited

Document Control Page

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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 appointed a designated Nodal Officer, who takes up client complaints by taking necessary steps and thereby complies to the regulatory requirement and 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 as well as the general public. 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. 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) Escalation: All responses to customer grievances will provide an escalation matrix mentioning the details of the next level of grievance redressal for the customer.

d) 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

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

Matters received from the customers shall be classified into the following category.-. The person authorised by the Nodal Officer shall decide to categorise the **matter** in one of the following category:-

1. **Query** – is defined as any communication from the customers for the primary purpose of requesting information about Digamber Capfin Limited and/or its services. Examples:
   Clarification on
   - Interest rate offered,
   - Repayment amount,
   - Eligibility for loan etc.

2. **Request –** A "Request" is defined as any communication from a customer/person to Digamber Capfin Limited soliciting a request. Examples:

- Mobile No. updation
- Any other update in the record .

3. **Grievance/Complaint:** A "Grievance/Complaint" is defined as any communication from our customer to Digamber Capfin Limited that expresses dissatisfaction about an action or lack of action, about the standard of service/deficiency of service of Digamber Capfin Limited and/or any intermediary or asks for remedial action. Examples:

- Non receipt of No Dues Certificate even after completion of loan and giving request.
- inappropriate behaviour by any Digamber Capfin Limited staff
- Harassment of customer regarding repayment

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.

5. Procedure for raising and handling of grievance

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

1. At the location of the company (the branch officials will immediately intimate the Customer Grievance Team at Head Office regarding the grievance/compliant from the customers)
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 or any other person 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 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.

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 other wise shall be resolved within a TAT of 30 days of receiving the complaint.

5.2 Process to be followed for Client Grievance: -

1 Step by step process to be adopted for Redressal of complaint

All complaints shall be received by the Grievance redressal team (GRT) who will maintain a register of all the matters received and will classify the matters in query, request and compliant category.

The GRT will resolve the query/request of the client and mention the same in the register maintained for the purpose

In case of any compliant the GRT will undertake the following process:-

1. Checking the details of the customer in the system

2. Try to resolve the matter to the best of their ability as per the process

3. If the compliant is related to fraud/commission or misbehaviour then the same will be informed to the Principal Nodal Officer and if required Investigating officer will be designated to investigate the matter.

4. Based on the report the action will be taken and the same will be notified to the customer and accordingly register maintained for the purpose will be updated.

The maximum time to resolve cases is 30 days.

A copy of the register duly updated by the Nodal Officer goes to the top management as scheduled. The look at each and every complaint and appraise the Nodal officer time to time.

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.

Escalation of grievances: The company has a three-tier escalation mechanism for customer grievances, as given below:
i. 1stLevel: Grievance Redressal Team (GRT)
ii. 2ndLevel: Principal Nodal Officer (PNO)

6. Review & Oversight of monitoring customer grievances:

The company shall constituted a client grievance redressal committee who will review and oversight the customer grievance mechanism and system in the company and shall note all the grievances received at least once in a quarter. The minutes of the committee shall be placed before the meeting of the Board of Directors of the company.

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 on a quarterly 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 / procedural change.

b) The analysis shall also include review of closure of case (adequacy of closure as well as timeliness). Key aspects of the analysis shall be highlighted to the senior management. 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 of the company shall be responsible to drive process improvement in coordination with other functions of the Company.

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

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

8. 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.