

NAVACHETANA

Grievance Redressal Policy

SHAISHAVI PROJECT
CONSULTANTS

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GRIEVANCE REDRESSAL POLICY

1. INTRODUCTION

A Grievance Redressal Cell (GRC) has been set up at the Head Office, which is responsible for ensuring that all customers' grievances are addressed. While the onus of addressing any customer queries and complaints lies with all employees of Navachetana, GRC shall be responsible for monitoring, tracking & reporting of all grievances received from customers. GRC team constitutes of vernacular team which attends to customer grievances and tracks the cases till closure. GRC Team will also have regional representatives nominated who attend to the customer grievance calls arriving to the Toll Free from the respective regions. This enables vernacular interaction support to the customers.

2. SCOPE & APPLICABILITY

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 GRC. Staff members at all levels and Grievance Redressal Cell (GRC) are duty bound to address the concerns of our customers.

3. PROCEDURE

Channels available for customers to contact Navachetana for complaints/requests/queries

- Contact branch staff directly for resolution
- Drop complaint in suggestion/complaint box placed in branches
- Call Toll free number 1800-425-2579
- Send an Email – hr.manager@navachetanagroup.com
- Write a letter to head office address mentioned in loan pass books

Any of our customers or any other person having any grievance against our staff or our services can take up the same with Center and/or Branch manager by raising the grievance during Center meetings, calling the branch manager, meeting branch manager at the branch or writing a complaint and dropping the same in the complaint/suggestion box kept in each branch. Any Grievance Received from the complainant shall be addressed by the branch within 5 working days.

If the aggrieved person is not satisfied with Center/Branch Manager's response or if the matter is of sensitive nature, she/he can call our Toll-free Number 1800-425-2579 or write an email to malatesh.cj@navachetanagroup.com or address a mail to:

Shri Malatesh C J

Grievances Redressal Officer (Principal Nodal Officer)

Navachetana Microfinance Services Pvt Ltd.,

Navachetana Heights, 1st Cross Ashwini Nagar Haveri 581 110

Grievances that are escalated to or directly reported to Grievance Redressal team at Head Office shall be resolved within a TAT of 30 working days (which includes 5 working days allowed for the branch).

The toll-free number along with the communication address has been printed in the loan pass book 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. It is also printed in the Center meeting minutes book which is used to document the minutes of the Center meeting. Also, information regarding the channels available for reporting grievances is communicated to all customers through Center meetings.

4. GRIEVANCE REDRESSAL PROCESS @ BRANCH

All field staff including the Branch Managers should adhere to the following process:

- When any of our customer contacts the branch directly with any “case”, the branch manager should make a note of the issue in a register maintained for this purpose. Simultaneously, the branch manager updates the details of the case to GRC which will generate a complaint number.
- The issue can be addressed at branch level directly or raised to the concerned department for resolution. Tickets registered will be followed up by the central team for resolution and necessary support will be provided.
- In case any issue cannot be resolved at branch level for whatsoever reason with in the stipulated time, it can be escalated to grievance redressal cell with all the details and Branch Manager's comments regarding the member's issue.

All issues (queries, requests and complaints) raised by customers are to be shared by the branch to the respective Area Manager & Regional Manager on a weekly basis on every Monday.

5. PROCESS @ GRC

- The toll-free number are accessible during the working hours for grievance redressal and any queries, requests or complaints raised by customers will be documented to provide appropriate resolution.
- When a customer calls the toll-free number, GRC shall collect the caller's details and the concerned member details when the caller is not our member. A ticket is registered to capture the grievance on immediate basis.
- Post the registration of ticket, additional information about the member/s are obtained by the GRC from the system, branch as well as the concerned department. The case is then diagnosed to determine the root cause of the grievance and further classification/determination of TAT. The turnaround time (TAT) for resolution of customer issues shall depend on the nature of the issue raised.
- When an issue is received by concerned department from GRC, they need to respond within 3 working days with the resolution TAT based on the nature of the grievance. If there is no response within 3 working days, GRC team will follow the response TAT escalation matrix to escalate the matter to the next levels.
- The TAT provided by the concerned department will be reviewed by the GRC and then communicated to the customer/complainant.

Note: In case of insurance claim related issues where documents are pending from the claimant/Nominee, the TAT will be considered from the date of receipt of all the relevant documents from the Nominee.

- GRC will follow up with the concerned departments for resolution of the grievance within the committed TAT. If any case is not resolved within the above specified TAT, GRC team will follow the response TAT escalation matrix to escalate the matter to the next levels.
- Once the case is resolved, the concerned department will interact with the complainant and confirm the resolution based on the consent of the customer. Further, they communicate regarding the closure to the GRC team. GRC team will update the closure status.
- If the resolution is not fully/ partially in favour of the customer/complainant, the case has to be referred to the Internal Ombudsman (as per the RBI IO scheme guidelines).
 - All such complaints will be examined by the Internal Ombudsman based on records available with Navachetana including any documents submitted by the complainant, resolution remarks and related documents furnished by the concerned department.
 - The Internal Ombudsman may interact with the concerned functionaries/departments and seek any additional record/document available with them in connection with the complaint.
 - The Internal Ombudsman may also seek additional information from the customer/complainant through the company.
 - In case the Internal Ombudsman disagrees with the resolution provided by the

concerned department, he will recommend the revised resolution as per his findings and analysis.

- The concerned department will either implement the recommended resolution or in exceptional cases where the recommendations cannot be complied with, will take approval from the MD&CEO and go ahead with the planned resolution. The concerned department will then interact with the complainant and confirm the resolution and based on the consent of the customer, communicate regarding the closure to the GRC team. GRC team will update the closure.
- Based on the above process, one of the below communications will be made during the closure interaction with the customer.
 - The case has been examined and upheld by IO.
 - The case has been examined by IO, however the company is upholding its original resolution overruling the IO's recommendation.
- The entire process has to be completed within 10 days from the point of escalation to IO and within 30 days from the receipt of the complaint.
- All the closed cases will be verified by the GRC team again by directly interacting with the complainant and taking a confirmation of the closure and marked as verified.

Escalation Channel

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:

RBI - Ombudsman

The Ombudsman

Smt. Jayasree Gopalan, C/o Reserve Bank of India, 10/3/8, Nrupathunga Road, Bengaluru -560 001

STD Code: 080

Tel. No. 22277660/22180221

Web: <https://cms.rbi.org.in>

Anonymous Calls

For anonymous calls received at the toll-free number, the nature of the call is to be determined first. In case the call was wrongly addressed to Navachetana, the case shall get noted as a query received incorrectly and closed upfront.

In case the call is of a serious nature where the complainant wishes to remain anonymous and raises a serious complaint either regarding a Navachetana employee or regarding a service provided by Navachetana, the nature of the case is recorded in the Grievance Redressal System along with the location of caller, branch (if available) and employee name/nature of service keeping the caller's name anonymous.

An investigation needs to be carried out regarding the call by the grievance cell. If the matter is extremely sensitive & personal in nature, then a field visit by the grievance cell officer or a senior officer from head office or regional office needs to be arranged to determine the facts of the case first hand. The concerned branch must not be involved in the investigation process.

On completion of the field visit, a report is submitted to the grievance redressal officer as well as MD&CEO regarding the facts of the case and recommended steps to resolve the issue. The grievance redressal officer with the approval of MD&CEO shall take action based on the report.

6. REPORTING

GRC shall submit the following periodical reports:

1. Weekly/Monthly Reports on the status on number of grievances received, resolved and pending to Senior Management and MD & CEO.
2. Quarterly reports with a detailed analysis of grievances received, resolved and pending to the GRC Committee.
3. All complaints pending beyond 3 months shall be highlighted to the SRC committee in the quarterly report.
4. Internal Ombudsman will submit reports on cases referred to him/her and his/her analysis on the overall complaints received by the company to the board on quarterly basis as per the formats prescribed by the board.
5. Internal Ombudsman will also submit reports to the RBI as per the prescribed formats in the intervals defined by the RBI.

ANNEXURES

Annexure I- Case Type & Category

Case Type to be recorded for tracking purposes can be one of the following three:

1. **Query** – is defined as any communication from the customers for the primary purpose of requesting information about Navachetana 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 to Navachetana soliciting a service such as a change or modification in the policy.

Examples:

- Request for moratorium on her existing loan
- Fresh emergency loan,
- Higher loan amount,
- Personal Loan,
- Insurance claim request, etc.

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

Examples:

- Customer raising an issue regarding a request not addressed on time.
- inappropriate behaviour by any Navachetana staff
- Harassment of customer regarding repayment
- Non-disbursal of an emergency loan on time, etc.

Annexure II- Escalation Process

Table A: Escalation process (in case of no response from concerned department/staff)

Responsible	Timeline (Working Days)
Customer contacts Navachetana with Grievance	Day 0
Branch Manager / Grievance Executive	Day 0
Resolving Unit Team Manager (Area Manager or equivalent)	Day 0 to Day 3
Reporting Manager (Regional Manager or equivalent)	Day 4
General Manager / State Head / Head of the department	Day 5
CEO / MD	Day 7

Table B: Escalation process (in case the case is not resolved within TAT)

Responsible	Timeline (Working Days)
Customer contacts Navachetana with Grievance	Day 0
Branch Manager / Grievance Executive	Day 0
Resolving Unit Team Manager (Area Manager or equivalent)	1 Day beyond Specified TAT* for the case
Reporting Manager (Regional Manager or equivalent)	3 Day beyond TAT
General Manager / State Head / Head of the department with copy to Grievance Redressal Officer	7 days beyond TAT
CEO / MD	10 days beyond TAT

* TAT is the turnaround time for any case, which needs to be provided by the concerned department or team member on receiving the case. In case the department does not respond, default TAT will be assigned by the GRC Team which is less than or equal to 7 days.