Standard Operating Procedure for redressal of the Grievances.

"Customer Centricity" is the key focus area of our Company. To ensure quick and quality resolution of customer complaints and treat them fairly, Company has formulated and adopted various policies viz Grievance Redressal Mechanism, Fair Practise Code and Internal Ombudsman Policy. With an objective to implement these policies and ensure customer delight and also to be compliant with the directions of regulator, a Standard Operating Procedure (SOP) has been devised for the guidance/reference to staff members in Operation dealing with grievance redressal and customer service. The Salient feature of the SOP is as under:

Escalation to Company & Regulator:

If a customer is not satisfied with the services provided by the Company, the customer has every right to complain to the grievance Cell or Customer service Department of the Company. RBI's specific guidelines are, "for resolution of Customer's Complaint/Grievance, Customer should lodge complaint first with Company. If no resolution is received from Company in 30 days or if Customer is not satisfied with the Company's reply/resolution, Customer may file his/her Complaint with RBI Ombudsman on RBI's CMS Portal (cms.rbi.org.in) OR by post to CRPC (CRPC, Reserve Bank of India, Sector 17, Chandigarh -160017). RBI discourages customers from filing a complaint directly with RBI Ombudsman as it may lead to rejection.

As per RBI guidelines, every case of denial of customer's complaint is referred to Internal Ombudsman for his examination. The details guidelines, in this regard, has been mentioned under heading "Roles and Responsibilities of Internal Ombudsman & "Procedure in cases where IO upheld or overrules the decision of the Company."

Procedure for Filing a Complaint.

1) Customer can call on the toll-free number of the Company/Call Centre.
2) The complaint may also be submitted through electronic or physical mode at Company Address/Branch address. Complaint, if submitted in physical form, shall be duly signed by the complainant or by its authorised representative. The complaint shall be submitted in electronic or physical mode in such format and containing such information as may be specified by Company.

3) Acknowledgement to the complainant should be sent on the same day or next working day on which complaint is received by Company through electronic means. If the Company needs any clarification or additional details from complainant, it should be done within 5 days of receipt of complaint. If Company is of the view that response/reply from Company will take longer time due to justifiable reasons Company should inform to complainant in writing about this fact.

Escalation metrics:

A) First Level Escalation.

- Customers can lodge their complaints by calling 1800-26-88486, between 10:00 am - 6:30 pm (Except 2nd and 3rd Saturday, Sundays & public holidays).

Or

- Customers can also lodge their complaints by writing an email to **customercare@authum.com,** Please note; for effective and faster resolution do not forget to mention your Loan Account Number (LAN).

Or

- Walk in at Branch: All branches are maintaining Customer Complaint Registers. The customer may approach Branch Customer Service to register a complaint in the register. Also, written complaints may be handed over at the branch or sent by post / courier.

B) **Second Level Escalation**

If the customer is not satisfied with the solution provided at Level 1, he/she can lodge a complaint to the Nodal Officer of the Company. Please share the previous Service Request Number/ Complaint Number while accessing these channels

Below mentioned are the details of the Principal Nodal Officer:

Name: Mr. Prakash Shirke

E-mail: nodalofficer@authum.com

Address:

Principal Nodal Officer,

Authum Investment & Infrastructure Limited (AIIL).

Unit No. 304, Sunrise Business Park, Plot No. B-68,

Road No.16, Kisan Nagar, Wagle Estate, Thane 400604.

C) Third Level Escalation

If the customer feels that the provided response is not satisfactory at Level 2, he/she can approach the Head – Operations & Customer Service of the Company by writing an email at - escalations@authum.com

Below mentioned are the details of the Head – Operations & Customer Service:

Name: Mr. Savneet Chopra

E-mail: escalations@authum.com

Address:
Head – Operations & Customer Service.
Authum Investment & Infrastructure Limited (AIIL).

Unit No. 304, Sunrise Business Park, Plot No. B-68,

Road No.16, Kisan Nagar, Wagle Estate, Thane 400604.

D) Fourth Level Escalation

If customer is not satisfied with our reply/resolution, or If the concern/dispute is not redressed within a period of one month Customer may approach RBI Ombudsman, writing complete details of complaints at the following address:

Centralized Receipt and Processing Centre (CRPC)

Reserve Bank of India,Central Vista,Sector 17,

Chandigarh 160017

OR

Customer may approach RBI Ombudsman by filing complete details of the complaint at "Complaint Management System Portal" for online filing of complaints, address of which is as under:

https://cms.rbi.org.in.

Turn Around Time (TAT)

The Maximum Response Time till Second Level escalation should not be more than 5 Days & 90% of the Complaints should be resolved with in TAT at second level escalation.

Whereas cases which need Inter-departmental advice or legal help or require details of the previous responses from various platforms or required retrieval of originals, the resolution TAT should further extend to 5 days including at third level of Escalation.

But the overall resolution turnaround time should be maximum 15 working days from the date of receipt of complaint at Company.

Initial Scrutiny of Complaints

1) Complaints which are offering suggestions or seeking guidance or explanation shall not be treated as valid complaints under the Scheme and shall be closed accordingly with a suitable communication to the complainant.
2) The remaining complaints shall be assigned to the Customer Service Department of the Company for further examination under intimation to the complainant. A copy of the complaint shall also be forwarded to the Nodal Officer of the Company.
3) The Company shall internally escalate partly and wholly rejected complaints to Internal Ombudsman within two weeks of receipt of complaint, before conveying the final decision to the complainant within overall period of 30 days, from the receipt of complaint.
4) In the event of failure of a Nodal officer to comply with the requisition without sufficient cause, the Internal Ombudsman may draw an inference that the Company has no information to furnish.
5) Complaints that are outside the purview of IO scheme shall be immediately referred to the Company.
6) This SOP should be for internal circulation among Company's staff & Executives.

Role & Responsibilities of Internal Ombudsman

1) The Internal Ombudsman shall not handle complaints received directly from the complainants or members of the public but deal with the complaints that have already been examined by the Company but have been partly or wholly rejected by the Company.

2) The following types of complaints shall be outside the purview of the Internal Ombudsman Scheme and shall not be handled by the Internal Ombudsman:

   (a) Complaints related to corporate fraud, misappropriation etc., except those resulting from deficiency in service, if any, on the part of the Company

   (b) References, suggestions and commercial decisions of the Company. However, service deficiencies in cases falling under 'commercial decisions' will be valid complaints for the Internal Ombudsman

   (c) Complaints / references relating to

      (i) Internal administration,
      (ii) Human resources, or
      (iii) Pay and emoluments of staff in the Company.

   (d) Complaints which have been decided by or are already pending in other fora such as the Consumer Disputes Redressal Commission, courts, etc.

   (e) Disputes for which remedy has been provided under Section 18 of the Credit Information Companies (Regulation) Act, 2005.

The Company shall forward all rejected / partially rejected complaints under the categories (a) and (b) above to the Internal Ombudsman. The Internal Ombudsman shall look for inherent deficiency in service in such cases and take a view whether any of these complaints can be exempted under (a) and / or (b) above as decided by the Company.

3) Complaints that are outside the purview of this scheme shall be immediately referred to the Company by the Internal Ombudsman.

4) The Internal Ombudsman shall analyse the pattern of complaints such as product / category wise, consumer group wise, geographical location wise, etc., and suggest means for taking actions to address the root cause of complaints of similar / repeat nature and those that require policy level changes in the Company.

5) The Internal Ombudsman shall examine the complaints based on records available with the Company, including any documents submitted by the complainant and comments or clarifications furnished by the Company to the specific queries of the Internal Ombudsman.

6) The Internal Ombudsman may seek additional information and documents from the complainant, through the Company. The Internal Ombudsman must record a "reasoned decision" in each case.

7) The Internal Ombudsman may hold meetings with the concerned functionaries of the Company and seek any record / document available with the Company that are necessary for examining the complaint and reviewing the decision. The Company shall furnish all records and documents sought by the Internal Ombudsman to enable expeditious resolution of the complaints without any undue delay.

8) The Internal Ombudsman shall, on a quarterly basis, analyse the pattern of all complaints received against the Company, such as product-wise, category-wise, consumer group-wise, geographical location-wise etc., and may provide inputs to the Company for policy intervention, if so warranted.

9) The Internal Ombudsman shall not represent the Company in legal cases before any court or fora or authority.

10) In cases of conciliation, where the decision of the Internal Ombudsman is accepted by the complainant, a statement showing the terms of agreement duly signed by the complainant, shall be kept on record.

11) In case the complaint is not resolved through facilitation, such action as may be considered appropriate, including a meeting of the complainant with the officials of Company, for resolution of the complaint by conciliation or mediation may be initiated.

12) The parties to the complaint shall cooperate in good faith with the Internal Ombudsman in resolution of the dispute and comply with the direction for production of any evidence and other related documents within the stipulated time.

13) If any amicable settlement of the complaint is arrived at between the parties, the same shall be recorded and signed by both the parties and thereafter, the fact of settlement may be recorded, annexing thereto the terms of settlement, directing the parties to comply with the terms within the stipulated time.

14) The complaint would be deemed to be resolved when:

(a) it has been settled by the Company with the complainant upon the intervention of the Internal Ombudsman through respective Department; or
(b) the complainant has agreed in writing or otherwise (which may be recorded) that the manner and the extent of resolution of the grievance is satisfactory; or
(c) The complainant has withdrawn the complaint voluntarily or not responded to Company's reply within 30 days from the receipt of communication.

Reporting and Governance:

1) Customer Service is responsible for quality resolution of complaints/grievances within 15 working days from the date of receipt of complaint.

2) A report on the complaints received by the Company will be furnished to Customer Service Committee of Board along with the root cause analysis and highlights of stance changed cases at every Meeting.

3) Responsibility on adherence to IO process lies with each of the service channels. The Risk and Customer Head will check adherence to the IO grievance handling process as part of the quarterly Meeting arranged by Customer Service Committee of Board with CEO.

4) Contact details of the IO need not be provided in public domain, as IO shall not entertain any complaint directly from customer/member of public.

5) The company shall use the analysis of complaints handled by the IO in their training program to raise awareness among the frontline staff, if need be. The IO may also be associated with such trainings, wherever necessary.

The comments and decision of the IO shall mandatorily be included in the information submitted by the Company to the office of the RBI Ombudsman while replying to/furnishing documents to the office of the RBI Ombudsman.

6) In cases where the complainant has approached the RBI Ombudsman before the IO has examined the complaint, the Company shall obtain the views of the IO and include the IO's views in the submission to the RBI.

Procedure in cases where IO upheld or overrules the decision of the Company.

(a) When Internal Ombudsman upholds the decision of the Company to reject or partly reject the Complaint, then reply to complainant should invariably mention following:

- Complaint has been examined by our Internal Ombudsman and for the reasons as stated in our above-mentioned reply, our decision has been upheld by the Internal Ombudsman

(b) When the Internal Ombudsman overrules the decision of the Company to reject or partly reject the complaint and Company has disagreed with the decision of Internal Ombudsman and obtained approval of its Competent Authority (CEO) to disagree, then reply to complainant should mention following:

- Complaint was examined by our Internal Ombudsman and the decision of the Company was overruled by the Internal Ombudsman in your favor, however, we, with the approval of our Competent Authority, has disagreed with the decision of the Internal Ombudsman".

C) Further, the following should also be part of the reply to customer at the end, for fully or partly rejected complaint, even after examination by the Internal Ombudsman.

- If you are not satisfied with our reply/resolution, you may approach RBI Ombudsman, writing complete details of complaints at the following address:

Centralized Receipt and Processing Centre (CRPC)

Reserve Bank of India, Central Vista, Sector 17,

Chandigarh 160017

OR

You may approach RBI Ombudsman by filing complete details of the complaint at "Complaint Management System Portal" for online filing of complaints, address of which is as under:

https://cms.rbi.org.in.

MIS/Reporting

- **Bi-Monthly MIS** on the process will be published by the Customer Service / Nodal Officer consisting of all the Relevant Information mentioned at Grievance Redressal Policy of the Company to IO.
- **IO Monthly Report**: A monthly report (both Quantitative and Qualitative) will be prepared and shared by Centralized service team with the IO by 15th of subsequent month.
- **The IO shall furnish periodic reports to the Board** of the Company on Quarterly Basis.

A report on the complaints received by IO office will be presented before the Board along with the root cause analysis and highlights of stance changed cases.

- **Head Customer Service Reporting to Company's Board:** All such cases where the Company disagrees with the decision of the IO with the approval of the CEO, shall be subsequently presented by the Head Customer Service for review to the Board of the Company on a quarterly basis.

The Head **Customer Service** shall put in place a system of quarterly reporting to Authority in a prescribed format:

a) **On a quarterly basis within 10 days from the end of the quarter**:

Table I: The total number of complaints received, the number of partly or wholly rejected complaints, the number of complaints escalated to the IO.
Table II: Information pertaining to Alternate Grievance Redressal (ADR).
Table III: Subjective assessment. Or
Details / Tables As per mentioned at GRM of the Company, the responsibility of format, Process & Reporting will be on Head Customer service.

b) **On an annual basis by April 10**:
Table I: Number of complaints referred to IO, number of cases where decision of Company was not upheld by IO, number of cases where the decision of IO has been rejected (with the approval of Competent Authority), number of IO decisions implemented/ not implemented.
Table II: Number of eligible complaints not referred to IO, number of complaints not responded within one month
Or
Details / Tables As per mentioned at GRM of the Company. the responsibility of format, Process & Reporting will be on Head Customer service.

Customer Service Committee/Consumer Protection Committee of Board:

The Company shall constitute a Customer Service Committee / Consumer Protection Committee Comprising of the Whole-Time Director as the Chairman of the Committee and Head – Operations & Customer Service, Nodal Officer and Chief Compliance Officer as the members of the Committee. Further The Internal Ombudsman shall be a permanent invitee to the meetings of the Committee. The Committee shall meet on a quarterly basis and review the customer complaints received. The Committee shall be responsible for customer service and protection. Further the Committee shall determine the structure of emoluments, facilities and benefits accorded to the Internal Ombudsman / Deputy Internal Ombudsman, which should be appropriate keeping in view the stature and position of the Internal Ombudsman / Deputy Internal Ombudsman being at the apex of the grievance redress mechanism of the regulated entity as also the need to attract experienced persons with requisite expertise.

The key roles & responsibilities of the Customer Service Committee are provided below:

1) The Customer Service Committee evaluate the efficacy, adequacy and quality of customer service in Company vis-à-vis the existing RBI guidelines on customer service and identify gaps, if any.

2) Suggest measures for enhancing customer service efficiencies, upgrading internal grievance redress mechanism in the Company and strengthening the overall consumer protection framework as per guidelines of RBI.

3) Customer Service Committee may put in place a suitable structure of incentives to encourage frontline Customer Service Executives, and respective departments to take proactive steps towards enterprise-wide improvements in customer service & minimise a regulatory cost and stops the Losses or frauds for Companies.

4) To update the periodically Updation of KYC Customer Service Committee should be actively involved and should have taken prompt steps to facilitate the smooth Updation of KYC, and while adoption a nuanced approach for risk categorization of the customers.

5) Customer Service Committee has the responsibility for obtaining and renewing the insurance of the primary asset (Cash, Fixed Interest, Property or Security & Shares) may be an unequivocal responsibility of one of the parties to the agreement, viz., the borrower or the

Company, and clearly indicated in the Key Facts Statement / Most Important Terms and Conditions document.

6) The Customer Service Committee Also Monitor the stipulating a time limit given by RBI for the Company to return the property documents to the borrower from the date of closure of the loan account, failing which a penalty / compensation linked to the extent of delay should automatically be paid by the Company to the borrower.

7) The Customer Service Committee also responsible in case of loss of property documents, the Company should not only be obligated to assist in obtaining certified registered copies of documents at their cost but also compensate the customer adequately, keeping in view the time taken to arrange the alternate copies of the documents.

8) The Customer Service Committee Responsible for the Customer-facing staff and officers should undergo mandatory training in soft skills to reduce instances of misbehaviour by the errant staff / officers. Adequate knowledge and in-depth understanding of the internal guidelines and the regulatory instructions.

9) The Customer Service Committee encourages & make available the facility for Keeping the security documents by the Company s in digi-lockers as this will facilitate easy retrieval in case the physical documents are misplaced.

10) Customer Service Committee Also Monitor that the need for effective financial customer protection, including data protection, measures to ensure safety of digital transactions and privacy of digital customer.

This SOP is subject to review from time to time as per the directions of the Board of the Company and/or RBI.

End of the Document