



Policy No	Title	Last Board Approved Date
19	Policy on Client Grievance Redressal Mechanism	
Circular No	Prepared By	Date Prepared
BE&I/19/04	Prashant Kumar, Shalini, Pravupada Pandit	28 th November, 2022
Version No	Reviewed By	Date Reviewed
5.0	Vikas Umrao	
Pre-Version No	Issuing Department	Last Issue Date
4.1	Process and Policy	15 th June, 2022
Effective Date	Approved By	Date Approved
	Thangaraju K, Anil Kwatra	

Statement of Confidentiality

This document is confidential in nature and contains information that is proprietary and confidential to Satin Creditcare Network Limited (SCNL) which shall not be disclosed outside SCNL, transmitted, or duplicated, used in whole or in part for any purpose other than its intended purpose. Any use or disclosure in whole or in part of this information without explicit written permission of Satin Creditcare Network Ltd is prohibited.

Client Grievance Redressal Mechanism

GRIEVANCE REDRESSAL PRINCIPLE

Satin Creditcare Network Limited (SCNL) is dedicated to provide the highest quality of services to its clients. SCNL believes in having a strong mechanism for recording and responding in a timely manner to queries and complaints of its clients. For the purpose, SCNL has a dedicated mechanism called “Sparsh” for timely and effective client grievance redressal. Recently, the entire process has been out-sourced to a centralized shared service provider (under CSS-IVR process) for better quality of service to our clients.

GRIEVANCE REDRESSAL PROCESS

SCNL has developed the redressal mechanism to solve its clients’ grievances on priority basis. There are different channels through which the clients can register their complaints with SCNL.

1. Toll-free Number- 1800-2-123-123
2. Complaint section in the centre meeting register
3. Complaint registers at branch and regional offices
4. Complaint boxes at branch and regional offices
5. Direct escalation to the head office through
 - a. Office landline number
 - b. Email ID- clientgrievance@satincreditcare.com
 - c. Surface mail to SCNL’s Grievance Redressal Officer (GRO) based at the head office

ELEMENTS OF GRIEVANCE REDRESSAL POLICY

Scope	To build a culture of developing satisfied and brand loyal customers that will improve client retention
Channels to register complaints	<ul style="list-style-type: none"> ▪ Toll-free number (Timing:- Morning 08:00 AM to Evening 06:30 PM, Monday to Saturday) ▪ During centre meetings in Centre meeting register ▪ Walk-ins in Branch office recorded in Complaint/Suggestion register ▪ Complaint boxes at branch and regional offices ▪ Letters/E-Mail/Phone call to Head office and Regional office
Inform clients about their rights	<ul style="list-style-type: none"> ▪ Training of clients – CGT & GRT ▪ Toll free number mentioned on loan cards ▪ SPARSH Poster at branches and regional offices ▪ Reminder training by staff in center meetings ▪ In Center leader workshops
Resolution in timely manner	<ul style="list-style-type: none"> ▪ Categorizing the complaints based on severity and criticality and defining TATs ▪ Escalation matrix: flow chart for complaint closure
Reporting and review mechanism	<ul style="list-style-type: none"> ▪ Data Analysis: (Trend, comparison, key matrices)
Staff roles and training	<ul style="list-style-type: none"> ▪ Defined KRA’s of Sparsh staff ▪ Mandatory training for complaint handling and monitoring
Monitoring clients grievance redressal	<ul style="list-style-type: none"> ▪ Proper log maintained. A daily and monthly report shared with regional and head office level operations team. ▪ Internal Audit check: client verification to measure client satisfaction ▪ Regulatory Compliance

Process to Register Complaints:

- 1. Through Toll-free Number:-** SCNL has a dedicated Toll Free Number **1800 2 123 123** and a dedicated team who compiles, addresses, escalates and resolves clients' queries/complaints. Contact Timing is Morning 08:00 AM to Evening 06:30 PM Monday to Saturday. The necessary steps to assure client grievance redressal are as following.

The client or his/her representative shall report to the Sparsh executive in case she has any query or complaint. She has to disclose the following things to the executive.

- I. Client and Husband's Name
- II. Location
- III. Member Id as written on the loan card
- IV. Loan Id as written on the loan card.
- V. Center number as written on the loan card.
- VI. Satin's Branch to which she is associated.
- VII. Name of the Community Service Officer (CSO) who handles her center.
- VIII. Name of the center leader.

Upon receipt of the complaint, the executive registers the complaint and speaks to all relevant stake holders namely, CSO/Branch Manager (BM)/Territory Manager (TM)/Deputy Regional Manager (DRM)/Regional Manager (RM) to validate the query/complaint raised by the complainant. If he/she finds the complaint genuine and which needs immediate redressal at the next immediate level, the executive mobilizes immediate support and ensures timely redressal of the complaint by taking help from the BM, TM, DRM, RM locally. Depending on the severity of the complaint, it is then escalated to the Sparsh SPOC at SCNL head office, who then follows up with the line departments to resolve the complaint.

Grievance redressal team maintains a call log/ control sheet of all the calls received on the toll free number in MS excel, where all the details of the query/ complaint are fed along with the subsequent escalation and action taken to resolve the grievance. In addition, complaints registered at the branch or regional office are also shared by the field team with the Sparsh SPOC who then takes the required follow-up on these cases to resolve them. Status of all the cases is also updated in the Sparsh log as

1. Closed
2. Open

Closed cases are all those cases which are resolved by the grievance redressal team either by sharing relevant information with the client or by immediate intervention of regional operations team at the branch or regional level, to the satisfaction of client. All those cases which are open and could not be resolved are flagged up to the line department's supervisor at the head office by describing the nature of the complaint. They then suggest appropriate action for all such cases and resolve the complaint to the satisfaction of client and in adherence to the FPC norm. The maximum time to resolve open cases is usually 1-2 weeks depending on the nature of complaint.

A summary of the control sheet duly updated by the GRM team is shared with the senior operations team (Principal Nodal Officer, Chief Operating Officer, and Deputy COOs/Circle Heads) on a daily basis. The team also prepares a monthly report at the end of each month with analysis of number, origin, type of calls/complaints and details of open cases, which is shared with the senior and middle level operations team.

A summary of all the complaints is presented in the board meeting, on quarterly basis, so that the board can appraise and guide the management on best practices on grievance redressal to enable SCNL to be a customer centric organization.

STANDARDS OF CARE

Standard	Indicator
Awareness among clients to submit complaints	<ul style="list-style-type: none"> Client knows about their right to complaint Clients know how to complain
Staff is trained to handle complaints	<ul style="list-style-type: none"> Dedicated staff training on complaint resolution Defined process of handling complaints aptly
Complaint resolution system is active and effective	<ul style="list-style-type: none"> Complaint policy on how to handle complaints and inform clients Effective system to resolve in timely way Assigned staff/dedicated team Clear reporting system Actively used by clients Client receive timely response Monitoring/Auditing to measure client satisfaction
Client feedback is utilized to improve the product/service	<ul style="list-style-type: none"> Improve product/process/operation/communication

- 2. Through Center Meeting Register (CMR) during center meeting:-** Client can register her complaint/s through CMR. It's the responsibility of CSO/Field staff to address the complaint/s and provide end to end solution to the concerned client. CSO/Field staff shall collate the registered complaints and submit them to the concerned BM along with the status (Open/closed) of the complaint/s.
- 3. Through walk-ins in Branch office recorded in Complaint/ Suggestion register:-** BM shall update all the complaints in the SPARSH register in the branch. TM/DRM/ RM shall verify, the complaints registered in the complaint register and check the status of the resolutions, during their visits to the respective branches.
- 4. Through Complaint boxes at branch and regional offices:-** : It is the responsibility of Branch Manager to check the status of the complaints in the complaint box on everyday basis and provide resolution to the complaints as per the priority. BM will be the primary key holder for the complaint box. If BM is on leave or has absconded, BM will hand-over the key to one of the CSOs. Received complaint/s shall require to be filed in a separate file naming "**Customer Grievance Redressal File**". TM/DRM/ RM shall verify, the CGR file during their visits. Further BM shall have to share the details via mail with concerned RC/RM on same day in which complaint/s has been registered. For RO, RC will be the primary key holder and RM will be the secondary key holder for the complaint box. It is the responsibility of RC & RM to check the status of the complaints in the complaint box on everyday basis and provide resolution to the complaints as per the priority. Received complaint/s shall require to be filed in a separate file naming "**Customer Grievance Redressal File**" in RO and share the details via mail on same day.
- 5. Through Letters/E-Mail/Phone call to Head office and Regional office:-** If complaints are registered through Letters/E-Mail/Phone call to HO then it is the responsibility of HO-CGR team to address and keep them recorded. Whereas If complaints are registered through Letters/E-Mail/Phone call to RO then it is the responsibility of RC/RM to address and get them resolved. On the other hand RC/RM is required to keep them recorded and share the details via mail.
- 6. Through MFIN:-** If the customer is not satisfied with the resolution provided by SPARSH or in case the customer does not get any resolution within 10 working days, the customer can call MFIN's toll free number – **1800 102 1080** to escalate the complaint.
- 7. Through Reserve Bank of India :-** If the complaint/dispute is not redressed within one month, the customer may contact the RBI at the below mentioned contact details,

**“Office In charge: Department of Non- Banking Supervision, 6, Sansad Marg, New Delhi – 110001, India
PH: (011) 2371 4456, 2373 9328, 23719466, FAX: (011) 2371 3672, 2375 2188,
Email: dnbsnewdelhi@rbi.org.in”**

DISCIPLINARY ACTION AGAINST STAFF

Based on the frequency and severity of a complaint, four (4) types of actions can be taken against the staff if he is found guilty. Post investigation by the supervisors, if the staff is found guilty then either of the following action is taken by the Chief Operating Officer:

1. Warning letter
2. Transfer
3. Can affect promotion
4. Termination

IMPORTANCE OF CLIENT GRIEVANCE REDRESSAL POLICY

- Better Customer Retention
- Enhance Brand Loyalty
- One Stop shop for loyal customers
- Improves product and process based on customer’s need
- Strengthen Customer service culture
- Compliance to regulation

COMPLIANCE WITH RESERVE BANK OF INDIA GUIDELINES

Reserve Bank of India (RBI) in August 2012, issued a directive on grievance redressal to NBFC-MFIs. Since then, RBI has been regularly issuing guidelines in their Fair practices Code (FPC) circulars on grievance redressal. SCNL has ensured that its client grievance redressal mechanism adheres to the guidelines issued by RBI through following measures:-

- SCNL has an appropriate grievance redressal mechanism within the organization, laid down and approved by the Board of Directors (BoD).
- Complaint mechanism ensures that all disputes arising are heard, escalated and resolved.
- Board reviews periodically the compliance of FPC and functioning of grievance redressal mechanism at various levels of management.
- Consolidated report of reviews is submitted to board at regular intervals.
- For the benefit of its clients, SCNL has displayed the following information prominently at their branches where business is transacted
 - Various channels through which client can register her complaint with SCNL.
 - The Sparsh Toll Free Number, name and contact details (Telephone/Mobile nos. and email address) of the Grievance Redressal Officer (GRO) who can be approached by the clients for resolution of complaints/queries.
 - Toll free Number of MFIN for grievance redressal (1800-102-1080).
 - Contact details of the Officer-in-Charge of the Regional Office of DNBS of RBI so that if the complaint / dispute is not redressed within a period of one month, the client may appeal to the local office of RBI.
 - A snapshot of RBI NBFC Integrated Ombudsman Scheme to give information about the scheme to the customers.

APPOINTMENT OF NODAL OFFICERS

In compliance with the RBI’s Integrated Ombudsman Scheme for Non-Banking Financial Companies 2021, Nodal Officers (“NO”) appointed at head/registered/regional/zonal offices, shall be responsible for representing the company and furnishing information to the Ombudsman in respect of complaints filed against the Company.

- **Principal Nodal officer (PNO) at Head office-** Head- Operational Excellence & Innovation who is also the designated GRO for SCNL.
- **NO at Circle level** – Business Head/Deputy COO/AVP Ops
- **NO at Zonal level** - Zonal Manager
- **NO at Regional level** - Regional Manager

The name and details of the PNO/NO at the Head Office, circle, zone and regional level have been forwarded to the Chief General Manager, Consumer Education and Protection Department, RBI and RBI Ombudsman of the concerned zones through email.

ROLE OF NODAL OFFICERS

- PNO/NOs are responsible, inter alia, for representing SCNL before the Ombudsman and the Appellate Authority under the Scheme.
- The PNO is responsible for coordinating and liaising with the Customer Education and Protection Department (CEPD), RBI, Central Office.
- PNO is also responsible for representing the company and furnishing information to the Ombudsman in respect of complaints filed against the Company.

APPOINTMENT OF INTERNAL OMBUDSMAN

- In terms of RBI directive dt. 15/11/2021, an Internal Ombudsman (IO) has been appointed w.e.f 13/05/2022 and any complaint rejected wholly or partly by GRM has to be escalated to him for final decision. As per SOP, IO has been given access to LMS and similarly given read only access to CMS of RBI.
- IO reports to the CMD administratively and to the Board functionally. IO is required to submit a report (quarterly & annually) to RBI, regarding the total no. of complaints and no. of wholly/partly rejected complaints referred to him. IO is also required to report to the Board at least bi-annually.

DISPLAY REQUIREMENTS

At all branches/offices where business is transacted, information about different ways in which a client can register his/her complaint with SCNL is displayed. Along with SCNL's toll free number, MFIN toll-free number and contact details of Regional RBI branch are also displayed. In compliance with RBI's Integrated Ombudsman Scheme 2021, a snapshot of RBI NBFC Integrated Ombudsman scheme including the name and contact details of the Ombudsman, who can be approached by the customer has been also displayed at SCNL's branches/offices.

COMPLAINT WITH INDUSTRY CODE OF CONDUCT (MFIN AND SA-DHAN)

SCNL's grievance redressal policy adheres to all the stipulations as per the Industry code of conduct prescribed by MFIN and Sa-dhan, which requires MFIs to

- Establish dedicated mechanism to handle/ receive complaints speedily and efficiently.
- Educate clients about the existence, purpose and process of mechanism.
- Designate staff to handle complaints and make his/ her contact numbers easily available to the clients.
- Inform clients about their right to refer unresolved matters to RBI and the grievance redressal mechanism established by industry associations like Sa-dhan and MFIN.

Annexure 1

COMPLAINT CATEGORISATION

Categories		
Ticket Category	Complaints	Application Stage Related
		Credit Bureau Related
		Disbursement Related
		Recovery Stage Related
		Related to Digital Transaction
		Related to Third Party Product/Service
		Staff Behavior
		Related to Insurance/Hospicash
		Related to Digital Lending
		Miscellaneous
	Queries	Application Stage Related
		Credit Bureau Related
		Disbursement Related
		Recovery Stage Related
		Related to Digital Transaction
		Related to Third Party Product/Service
		Related to Insurance/Hospicash
		Related to Digital Lending
		Miscellaneous

Type 1	Application Stage Related
	Loan Rejection
Type 2	Disbursement Related
	Related to third party product/service
	Staff behavior
	Miscellaneous
	Related to Digital Lending
Type 3	Credit Bureau Related
	Recovery Stage Related
	Related to Digital Transaction
	Related to Insurance/Hospicash

ESCALATION MATRIX

TYPE 1	TAT
BM/TM/DRM/RM	T+3 days
ZM	4-5 th day
BH/Dy.COO/Circle Head/COO	6 th day
PNO	7 th day

TYPE 2	TAT
BM/TM/DRM/RM	T+4 days
ZM	5-7 th day
BH/Dy.COO/Circle Head/COO	8-9 th day
PNO	10 th day

TYPE 3	TAT
BM/TM/DRM/RM	T+5 days
ZM	6-9 th day
BH/Dy.COO/Circle Head/COO	10-12 th day
PNO	13-15 th day

* For all the complaints related to Suspected Fraud/Fraud/Fraud by client, the escalation matrix is mentioned below,

Fraud/Suspected Fraud/Fraud by Client	TAT
TM/DRM/RM/ZM	T+14 WD
Dy.COO/Circle Head/COO	15-19 th day
PNO	20-21 st day

Any exception requires written approval of COO & Head- Operational Excellence & Innovation.

Any lapse in the above mentioned process will lead to the serious disciplinary action against concerned staff.

COO

Head- Operational Excellence & Innovation