



## SATIN Creditcare Network Limited

### Document Control

<b>Document Name</b>	<b>Policy on Client Grievance Redressal Mechanism</b>
<b>Document Reference Number</b>	5
<b>Version Number</b>	5.3
<b>Created by</b>	Pravupada Pandit, Saurabh Mishra
<b>Reviewed by</b>	Vikas Umrao
<b>Approved by</b>	Anil Kwatra, Dhiraj Jha, Gaurav Kumar Gupta
<b>Effective From</b>	01/04/2025

### Revision History

Date	Ver	Description (First Release/Revision)	Created by	Reviewed by	Approved by	Board Approval
17-11-2024	5.3	Policy on Client Grievance Redressal Mechanism	Pravupada, Saurabh	Vikas Umrao	Anil Kwatra, Dhiraj Jha, Gaurav Gupta	12/03/2025
11/01/2024	5.2	Policy on Client Grievance Redressal Mechanism	Pravupada, Saurabh	Vikas Umrao	Anil Kwatra, Dhiraj Jha	22/03/2024
16/10/2023	5.1	Policy on Client Grievance Redressal Mechanism	Pravupada, Binayak	Vikas Umrao	Anil Kwatra, Dhiraj Jha	
28/11/2022	5.0	Policy on Client Grievance Redressal Mechanism	Pravupada, Shalini	Vikas Umrao	Anil Kwatra, Dhiraj Jha	27/03/2023

### Statement of Confidentiality

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Classification | INTERNAL

### Introduction

Satin Creditcare Network Limited (SCNL) is committed to providing its borrowers with the highest level of service quality. SCNL places a strong mechanism on maintaining an efficient system for promptly recording and addressing borrower inquiries and complaints. To facilitate this, SCNL has established a dedicated system known as "SPARSH" designed for the effective and timely resolution of borrower's grievances.

### Objectives

The objectives of this policy are to establish a fair and transparent process for resolving borrower's grievances, ensuring that they are addressed in a timely and efficient manner. Additionally, the policy aims to identify and address the root causes of these grievances to prevent their recurrence, ultimately improving the quality of SCNL products and services.

### Scope

This policy covers all grievances from customers, including those about loan products, insurance products, third-party products, and customer services.

### Updation of Policy:

This policy may be updated by the Process & Policy Department based on business requirements, with approval from the designated Authority/Committee, and will be communicated to all stakeholders. The company board shall review this policy annually.

#### 1. Importance of Client Grievance Redressal Policy

This policy helps in better borrower retention and enhances brand loyalty by providing a one-stop shop for loyal borrowers. Additionally, it allows for improvements in products and processes based on borrower needs and ensures compliance with regulations.

#### 2. Process to Register Query/Complaints

SCNL has developed a robust redressal mechanism to prioritize and effectively address grievances from borrowers. Borrowers can reach out to SCNL through a variety of channels, ensuring their concerns are heard and resolved promptly.

##### a) Complaint Register

Borrowers can visit any SCNL branch office and register their complaints in the complaint register available at the branch. This register is regularly reviewed by the branch manager to ensure timely resolution of complaints.

##### b) Complaint Box

Each SCNL branch has a complaint box where borrowers can drop their written complaints. The complaint box is checked daily, and the complaints are registered by the branch staff.

##### c) Direct Letter to Head Office

Borrowers can send a direct letter detailing their complaint to the SCNL head office. This allows borrowers to escalate their concerns directly to the higher management for resolution.

##### d) Dedicated E-Mail Support for Borrowers

SCNL provides a dedicated email address for borrower support where borrowers can send their complaints. This channel ensures that borrowers can reach out conveniently and receive a prompt response.

(E-mail- [clientgrievance@satincreditcare.com](mailto:clientgrievance@satincreditcare.com))

**e) Toll-free Number**

Borrowers can call the SCNL toll-free number (18002123123) to register their complaints. This service is available from morning 08:00 am to evening 06:30 pm, Monday to Saturday to ensure that borrowers can easily communicate their grievances and receive assistance.

**f) Principal Nodal Officer:**

In case the borrower's issue remains unresolved after fifteen days of contacting the SPARSH team, they can reach out to:

**Mr. Anil Kwatra**, Principal Nodal Officer & Grievance Redressal Officer

Contact: **0124-4715400**

E-mail: [anil.kwatra@satincreditcare.com](mailto:anil.kwatra@satincreditcare.com) / [pno@satincreditcare.com](mailto:pno@satincreditcare.com)

Address: Satin CreditCare Network Limited, Plot No: 492, 4th floor, Udyog Vihar Phase III, Sector-20, Gurugram, Haryana

**g) Through MFIN/Sa-Dhan**

If the borrower is not satisfied with the resolution provided by SPARSH or in case the borrower does not get any resolution within 30 working days, the borrower can call MFIN's (toll-free number – 18001021080) or Sa-Dhan (Contact No: 011-47174418/E-mail: [nandi@sa-dhan.org](mailto:nandi@sa-dhan.org)) to escalate the complaint.

**h) Through the Reserve Bank of India**

If the complaint/dispute is not redressed within one month, the borrower may contact the RBI at the below-mentioned contact details;

**Centralized Receipt and Processing Centre (CRPC)**

Reserve Bank of India

Central Vista, Sector-17

Chandigarh- 160017

E-Mail: [crpc@rbi.gov.in](mailto:crpc@rbi.gov.in)

**3. Process for Handling Complaints from Borrowers**

- i. Receiving Complaints:** When a complaint is received from a borrower, the HO SPARSH team escalates it to the relevant stakeholders (Field/Head- Office) for investigation.
- ii. Investigation and Resolution:** Based on the investigation, the SPARSH team communicates the resolution to the borrower and updates the case status in the LMS (Closed, Open, Request).
- iii. Daily and Monthly Reporting:**
  - **Daily:** The SPARSH team updates a control sheet and shares it with the senior operations team.
  - **Monthly:** A report analyzing calls/complaints is prepared and shared with the senior and middle-level operations team.
  - **Quarterly Board Review:** A summary of all complaints is presented at the board meeting quarterly for review and guidance on best practices.
- iv. Regular Audits:** SCNL conducts half-yearly audits to ensure the effectiveness of the Customer Grievance Redressal Mechanism (CGRM). The audit checks compliance, employee awareness, borrower orientation, and complaint processing.
- v. Audit Reporting:** The CGRM audit report is reviewed by the board/senior management every six months.

#### 4. 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 actions is taken by the concerned Circle Head in consultation with PNO/GRO:

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

#### 5. Compliance with Reserve Bank of India Guidelines

SCNL ensures its client grievance redressal mechanism adheres to the guidelines issued by the Reserve Bank of India (RBI) through the following measures:

**Grievance Redressal Mechanism:** Established and approved by the Board of Directors.

**Complaint Handling:** Ensures all disputes are heard, escalated, and resolved.

**Board Reviews:** Periodically reviews compliance with the Fair Practices Code (FPC) and the functioning of the grievance redressal mechanism.

**Reporting:** Consolidated review reports are submitted to the board regularly.

**Borrower Information:** Displayed prominently at branches, including channels for registering complaints.

#### 6. Appointment of Nodal Officers

In compliance with the RBI's Integrated Ombudsman Scheme for Non-Banking Financial Companies 2021, SCNL shall appoint a Principal Nodal Officer at their head office who shall be of a rank not less than a General Manager or an officer of equivalent rank. This officer will be responsible for representing SCNL and providing information regarding complaints filed against the organization. Additionally, SCNL may appoint other Nodal Officers to assist the Principal Nodal Officer as deemed necessary to ensure operational efficiency.

#### 7. Appointment of Internal Ombudsman Officers

SCNL will appoint an Internal Ombudsman who is a retired or serving officer equivalent to a General Manager, with at least seven years of relevant experience. The Internal Ombudsman must not have been previously employed by SCNL or its related parties and must be under 70 years of age at the end of their tenure.

SCNL may also appoint Deputy Internal Ombudsmen to assist the Internal Ombudsman. These officers must be retired or serving officers not below the rank of Deputy General Manager, with at least five years of relevant experience, and must be under 70 years of age. They will report to the Internal Ombudsman and may act in their absence for up to 15 working days.

The tenure for both Internal and Deputy Internal Ombudsmen is three to five years, without reappointment or extension. They cannot be removed before the end of their term without RBI approval. SCNL must ensure the position is never vacant and plan appointments to allow for a one-month overlap between outgoing and incoming officers.



## 8. Display Requirements

SCNL must ensure strict compliance with the scheme's requirements to facilitate its smooth conduct. Non-compliance may result in action by the Reserve Bank.

- a. **Display of Contact Information:** SCNL must prominently display the name and contact details (phone number and email) of the Principal Nodal Officer at all branches and business locations, along with the Reserve Bank of India Ombudsman complaint portal details (<https://cms.rbi.org.in>).
- b. **Language and Accessibility:** The salient features of the scheme must be displayed in English, Hindi, and the regional language at all offices and branches to ensure visitors have adequate information.
- c. **Availability of Scheme Copy:** A copy of the Scheme must be available at all branches for borrower reference upon request.
- d. **Website Information:** The salient features of the Scheme, along with the Scheme copy and the Principal Nodal Officer's contact details, must be displayed and regularly updated on the Regulated Entity's website.

## 9. Compliance with Industry Code of Conduct (MFIN And Sa-Dhan)

SCNL's grievance redressal policy adheres to the Industry Code of Conduct prescribed by MFIN and Sa-Dhan. This includes the following requirements:

- a. **Dedicated Complaint Mechanism:** Establish a system to handle and receive complaints quickly and efficiently.
- b. **Client Education:** Inform borrowers about the existence, purpose, and process of the grievance redressal mechanism.
- c. **Designated Staff:** Assign staff to handle complaints and ensure their contact information is easily accessible to borrowers.
- d. **Client Rights:** Inform borrowers about their right to refer unresolved matters to the RBI and the grievance redressal mechanisms established by industry associations like Sa-Dhan and MFIN.

## 10. Framework for Compensation to Customers for Delayed Updation/Rectification of Credit Information

- a. **Compensation for Delay:** As per RBI circular RBI/2023-24/72, complainants are entitled to a compensation of Rs.100 per day if their complaint regarding credit information updation/rectification is not resolved within 30 days.
- b. **Request and Update Process:** Borrowers can request SCNL or a Credit Information Company (CIC) to update their credit information. SCNL must forward corrected information to the CIC within 21 days of receiving the complaint. Failure to do so results in a compensation of Rs.100 per day.
- c. **Approval and Payment:** The CGRM team will share complaint details and reasons for delay with the Principal Nodal Officer. Upon approval, the compensation amount will be credited to the complainant's bank account within five working days.
- d. **Rejection of Complaint:** If SCNL rejects the complaint, the borrower will be informed along with the reason for rejection. Borrowers can approach the RBI Ombudsman for wrongful denial of compensation.

- e. **Alerts and Communication:** SCNL will send SMS/email alerts to borrowers about defaults/Days Past Due (DPD) in existing credit facilities. SCNL will also inform CICs and complainants about delays and compensation after resolution.
- f. **Nodal Point for CICs:** SCNL has a dedicated contact point for CICs to address borrowers grievances. Changes in nodal points will be communicated to CICs within five days.
- g. **Root Cause Analysis (RCA):** SCNL will conduct RCA of borrower grievances at least half-yearly, using data from CICs and Data Quality Index (DQI) for analysis. SCNL will inform borrowers of the reasons for rejecting their data correction requests to help them understand the issues.

### 11. Complaint Categorization

Categories		
Category	Complaints	Application Stage Related
		Credit Bureau Related
		Disbursement Related
		Recovery Stage Related
		Related to Digital Transaction
		Related to Third-Party Product/Service
		Staff related
		Related to Insurance/Hospicash
		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

*\*Please refer to the **Annexure 1** of the policy for detailed categories of customer complaints*

**Here is the complaint categorization;**

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

## 12. Escalation Matrix

TYPE 1	TAT	TYPE 2	TAT
HO	T+3	HO Concerned Dept. (MIS, Insurance, Etc.)	T+4 days
TM/DRM/RM	4 <sup>th</sup> – 5 <sup>th</sup> day	Team Lead	5-7 <sup>th</sup> day
ZM	6 <sup>th</sup> -7 <sup>th</sup> day	Head of Dept.	8-9 <sup>th</sup> day
Circle Head	8 <sup>th</sup> - 9 <sup>th</sup> day	PNO	10 <sup>th</sup> day
PNO	10 <sup>th</sup> day		

## Annexure 1

Category	Sub-Category
<b>Application Stage Related</b>	Field Officer Not Taking Application
	Loan Rejection/ Refused to Give Reasons for Loan Rejection/ Loan Rejection Has Not Intimated Within Specified Time
	Unauthorised Use of KYC Documents of Client/Co-Insurer
	Product details not informed
	Fee demanded/charged for loan application
	Acknowledgement not given for loan application submitted
	Status of loan application not informed
	Delay in processing/sanctioning of loan
<b>Credit Bureau Related</b>	Loan Closed but Didn't Get The NOC
	Client Payment Record Not Updated to CICs
	The Appearance of Client's Name as A Write-Off in The CB Report
	CB Report Shows an Active Loan When A Client Has No Loan/Pre-closed/Closed the Loan
	Double Entry of The Same Loan in The CB Report
<b>Disbursement Related</b>	Dispute Related to Disbursement Amount
	Did Not opt For Loan but Received SMS Of Loan Sanction/Disbursement in Client's Name.
	CSO Not Providing/Updating Loan Card
	Loan Sanctioned but Amount Not Transferred/Disbursed
	Terms & Conditions Not Disclosed to Customers
	Loan Is Not Disbursed on Time
	Disbursement Amount Is Less/more Than Sanctioned Amount
	Loan agreement not given
	Loan agreement does not include key details
	Loan card does not include key details
<b>Recovery Stage Related</b>	Collection of Installment Without Acknowledgement or Without Sign of Loan Card
	Visited To Client House During Odd Hour For Loan Recovery


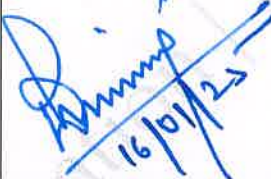



	Seized Household Items of Clients for Not Paying Loan Installment/Coercive Recovery Practice.
	EMI/Payment Not Updated In LMS
	Other Issues/Harassment Related to Staff/Recovery Agents.
	Out Sourcing Recovery Related Complaints
	Repayments done not acknowledged/updated
	Penalty demanded/charged for delayed repayment
	Repayment demanded/collected before due date
	Penalty charged for absence from center meeting
	Pre-closure not allowed
	Penalty demanded/charged for pre-closure
	Forced for Pre-closure
	Final discharge/acknowledgement for closure not given
<b>Related to Digital Transaction</b>	Client Has Paid the Instalment Digitally but EMI Is Not Settled/Updated
	Paid More Amount Than the EMI Amount
	Transaction Failed but Money Is Deducted
	QR Code Not Working
	Client Paid to Staff Digitally & Installment Is Not Updated
	Unable to Pay Through Website
	Unable to Login/Pay Via CSA App
	Demand Is More Than Monthly Instalment
	Delay in Instalment Reversal
<b>Related to Third Party Product/Service</b>	EMI was mistakenly transferred to wrong account/other member's loan account
	Forced Cross Selling
	Receipts/documents not provided for purchased product
	Customer not informed about charges of third-party/cross-sell product
	Customer not informed/misinformed about product features
	Product Not Delivered/Delayed Product Delivery
	Faulty/Not Working Products Delivered & Client Wants to Return/Wants to Avail Guarantee/Warranty
<b>Related to Insurance/Hospital Cash</b>	Lack of Cooperation/Support from Field Staff in Collecting Documents from Clients or Clients' Families/To Inform About Death
	Details of insurance coverage not provided
	Receipt of premium amount not given
	Repayment not stopped after death of insured person
	Insurance claim not received after submission of the documents
	Insurance claim received is less/more than her principal loan amount outstanding at date of death.

	Repayment collected after death has not been refunded
	Insurance amount is withheld by the MFI
	Issues with claim cheque
	Client stated that she had submitted the documents but the claim is still pending
	Lengthy processes/formalities of insurance
	Client Had Many Loans from Satin Company but After Self/Husband Death, Nominee Received Only One Claim
	Client Complained That Insurance Claim Cheque Bounced When Submitted in Bank.
	Client Complained That Name Mismatch in Insurance Claim Cheque and Bank Account
	Client Complaint Regarding Expiry of Insurance Claim Cheque
	Death Certificate Issue (I.E. Documents Without Death Certificate)
	Hospicash Related Claims
<b>Staff Related</b>	Late Coming of Staff in Center Meeting
	Rude Or Unprofessional Behaviour Towards Borrowers
	Field Staff/Branch Manager Demanded Commission/Money to Provide NOC
	Field Officer Demands Money for Next Cycle Loan/ For Deleting Name from Credit Bureau List/For Collecting Insurance Documents
	BM Is Not Disbursing the Loan
	Fraud Conducted By Staff
	Suspected Fraud by The Staff
	Refused to Entertain Borrowers' Queries
	CSO Is Charging Fine from Clients for Coming Late to The Center Meeting
	Asked Commission For Getting Loan/Sanction Loan
	Client Complained That CSO Forced Her to Settle Her Loan.
	Client Complained That CSO Collected Instalments After Death of Client/ Husband.
	Every Time New CSO Is Coming to Collect Installment So Client Is Not Confident Of Handing Over Her Payment
	Client Wants to Pay Installment Via Cheque & CSO Refused to Receive Cheque.
	Misguided Clients for Adopting Unethical Practice
<b>Others</b>	Unbecoming Behaviour Of CSO/ BM Asking for Non-Monetary Favours
	Staff Asked Client to Send Instalment Amount to His/her Account
	Client Has Already Repaid Her Loan but Still Received Legal Notice
	Client Complaint That at The Time of Lockdown Your Staff Did Not Come for Centre Meetings and She Did Not Take Any Moratorium Then Why Should She Pay Additional Interest

Moratorium Client Paid All Her Due Amount During Lock- Down Before 31st Aug But Still Extra Interest Has Been Applied On her Active Loan
Client Complained That Centre Leader Took/Demand Extra Money From Her
Client Complained That Centre Leader Behaviour Was Not Good
Fraud Conducted by Center Leader/Group Member/Others
Suspected Fraud of Center Leader/Group Member/Others
Data Privacy, Advertising, Cyber Security

Any exception requires prior approval of the Chief Business Officer and any lapse in the above-mentioned policy will lead to serious disciplinary action against concerned staff.

Approval Authorities Details & Signature		
Anil Kwatra	Dhiraj Jha	Gaurav Gupta
Chief Business Officer	Chief Risk Officer	Head- Process & Policy
 16/01/25	 16/01/25	 16/01/25

End\*\*\*\*