



## SATIN Creditcare Network Limited

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Classification | INTERNAL



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## 1. Abbreviation Table

For the purpose of this Policy, the following abbreviations shall have the meanings assigned to them below. Unless the context otherwise requires, these abbreviations shall be read consistently across this document.

Abbreviation	Full Form / Description
BM	Branch Manager
CGRM	Customer Grievance Redressal Mechanism
CIC	Credit Information Company
CMS	Complaint Management System (RBI Portal)
CoC	Code of Conduct
CBO	Chief Business Officer
CRO	Chief Risk Officer
CSO	Customer Service Officer
CPP	Client Protection Pathway
GRO	Grievance Redressal Officer
HO	Head Office
IO	Internal Ombudsman
JLG	Joint Liability Group
LMS	Loan Management System
MFIN	Microfinance Institutions Network
NBFC	Non-Banking Financial Company
NBFC-MFI	Non-Banking Financial Company – Microfinance Institution
PNO	Principal Nodal Officer
RBI	Reserve Bank of India
RE	Regulated Entity
SCNL	Satin Creditcare Network Limited
SRO	Self-Regulatory Organization
SOP	Standard Operating Procedure
TAT	Turnaround Time

## 2. Introduction

Satin Creditcare Network Limited (“SCNL” or “the Company”), being a Non-Banking Financial Company - Microfinance Institution (NBFC-MFI), is committed to ensuring fair treatment of customers and maintaining high standards of transparency, accountability, and responsible lending practices.

This Policy on Customer Grievance Redressal Mechanism (“CGRM”) is framed in accordance with and pursuant to the applicable regulatory framework, including, inter alia:

- The Reserve Bank of India (Regulatory Framework for Microfinance Loans) Directions, 2022;
- The Reserve Bank of India (Fair Practices Code for NBFCs);
- The Reserve Bank of India Integrated Ombudsman Scheme, 2021, as amended from time to time;
- RBI circulars/guidelines on strengthening of internal grievance redressal mechanisms and appointment of Principal Nodal Officer/Internal Ombudsman;
- The Codes of Conduct prescribed by recognized Self-Regulatory Organizations (SROs), including the Microfinance Institutions Network (MFIN);
- The MFIN Guidance Note on Customer Grievance Redressal Mechanism; and
- The Client Protection Standards

In line with the above regulatory and industry standards, the Company shall establish a structured, transparent, and time-bound Customer Grievance Redressal Mechanism to ensure that customer complaints are handled efficiently, fairly, and consistently across all business operations.

This Policy sets out the framework for receiving, registering, investigating, resolving, monitoring, and reporting customer grievances, while ensuring appropriate internal oversight, regulatory compliance, and continuous improvement in service delivery.

## 3. Objective

The objectives of this Policy are to:

- Establish a structured, transparent, and well-defined CGRM across the organization.
- Ensure timely, fair, and impartial resolution of customer complaints in accordance with defined TAT.
- Provide accessible, free-of-cost, and multiple channels for customers to register and escalate grievances, including escalation to SROs and RBI as applicable.
- Define clear roles, responsibilities, and accountability of employees and third-party service providers in grievance handling.
- Ensure compliance with applicable RBI regulations, including the Regulatory Framework for Microfinance Loans and Integrated Ombudsman Scheme, as well as the MFIN Guidance Note and SRO Codes of Conduct.
- Promote continuous improvement through structured monitoring, reporting, audit review, and analysis of complaint trends.

## 4. Scope And Applicability

This Policy applies to:

- All products and services offered by SCNL under JLG, Individual Lending, SME, and any other lending segments.

- All offices, branches, departments, and business units of SCNL.
- All employees, outsourced agencies, recovery agents, and third-party service providers engaged in customer-facing functions.
- All customer complaints received through any channel.

## 5. Governance Framework

The Company has established a robust governance structure to ensure effective oversight, accountability, and regulatory compliance of the CGRM. The framework defines clear roles and responsibilities at various levels to ensure transparency, independence, and timely resolution of customer grievances.

### 5.1. Ownership

The Operational Excellence & Customer Service function shall be the custodian of this Policy and shall be responsible for its implementation, monitoring, and periodic review to ensure continued regulatory alignment.

### 5.2. Role of the Board of Directors

The Board of Directors shall:

- Approve this Policy and any amendments thereto.
- Review the effectiveness of the CGRM framework at least annually.
- Review periodic reports on grievance trends, systemic issues, and corrective actions.
- Ensure continued compliance with applicable RBI regulations and SRO guidelines.

### 5.3. Role of Senior Management

Senior Management shall:

- Ensure effective implementation of this Policy across all business units and locations.
- Establish adequate systems, staffing, and controls for grievance handling.
- Monitor compliance with defined TAT standards.
- Initiate corrective and preventive measures based on complaint analysis and audit observations.

### 5.4. Appointment of Principal Nodal Officer (PNO)

In accordance with applicable RBI guidelines and the Integrated Ombudsman Scheme, the Company shall appoint a PNO at its Head Office, not below the rank prescribed by RBI. The PNO shall oversee the grievance redressal mechanism and coordinate with RBI, SROs, and other regulatory authorities in relation to customer complaints.

SCNL may also appoint additional Nodal Officers, as considered necessary, to support the PNO in the effective handling and timely resolution of customer grievances.

### 5.5. Internal Ombudsman (IO)

The Company shall appoint an IO/Dy. IO in accordance with RBI requirements to independently review complaints that are partially resolved or wholly rejected by the internal grievance redressal mechanism.

The functioning and independence of the IO shall be governed by applicable RBI directions and the Company's Internal Ombudsman Policy.

## 6. Customer Grievance Registration Channels

SCNL shall provide multiple, accessible, and free-of-cost channels to enable customers to register grievances conveniently. The Company shall ensure that these channels are widely communicated and operational across all locations.

All the grievance channels shall free of cost at all times. Where complaints are initially handled through automated systems, a live human interaction option shall be made available.

### 6.1. Center Meeting Register

Customers may raise grievances during scheduled center meetings. Such complaints shall be recorded in the Center Meeting Register and promptly forwarded to the concerned branch or centralized grievance team for necessary action and monitoring.

### 6.2. Branch Complaint Register

Each branch shall maintain a Complaint Register accessible to customers during working hours. Branch officials shall ensure that complaints recorded in the register are reviewed regularly and acted upon within the prescribed timelines.

### 6.3. Complaint Box at Branches

A complaint box shall be installed at all branches to allow customers to submit written grievances confidentially. The complaint box shall be opened at defined intervals, and all complaints received shall be registered in the centralized grievance system.

### 6.4. Toll-Free Customer Helpline

SCNL shall operate a dedicated toll-free helpline for customer grievances. Complaints received through the helpline shall be recorded, assigned a reference number, and acknowledged within the defined timeframe.

### 6.5. Official Grievance Email ID

Customers may submit complaints through the Company's designated grievance email ID. All email complaints shall be systematically recorded and responded to in a time-bound manner.

### 6.6. Written Complaints to Head Office

Customers may submit written complaints directly to the Company's Head Office. Such complaints shall be formally registered upon receipt and handled in accordance with the prescribed grievance redressal process.

### 6.7. Digital Channels

Where applicable, the Company may provide digital platforms such as mobile applications or website-based complaint forms. Digital complaints shall be integrated with the centralized grievance system to ensure uniform tracking and resolution.

## 7. Complaint Handling Process

The Company shall maintain a structured, transparent, and time-bound process for handling customer grievances to ensure fairness, consistency, and regulatory compliance.

### 7.1. Registration and Acknowledgement

All complaints received through any authorized channel shall be recorded in the centralized grievance redressal system.

An acknowledgement shall be provided to the customer within 48 hours of receipt of the complaint. The acknowledgement shall include:

- A unique complaint reference number through the SMS or email;
- The expected timeline for resolution; and
- Details of the escalation mechanism, including internal and external avenues.

### 7.2. Categorization

Complaints shall be categorized under defined heads to enable structured handling, monitoring, and analysis. Broad categories shall include, inter alia:

- Loan Application
- Disbursement
- Recovery Related
- Credit Bureau
- Related to Staff
- Insurance
- Third-Party Products
- Digital Transactions
- Others

Detailed sub-classification, if any, shall be maintained in the customer service SOP.

### 7.3. Investigation and Resolution

All complaints shall be examined impartially and objectively by the concerned department or designated authority.

Necessary facts and records shall be reviewed before arriving at a reasoned decision. The resolution shall be communicated to the customer through appropriate channels, including call, SMS, email, or written communication, as applicable.

### 7.4. Internal Escalation Mechanism

The Company shall follow a structured, multi-level internal escalation framework for grievance redressal as detailed below:

#### 7.4.1. Level 1:

Customers may initiate the grievance redressal process by approaching their CSO or BM. Complaints may be registered by entering details in the Complaint Register available at branches or by dropping a written complaint in the complaint box.

#### 7.4.2. Level 2:

If the customer is dissatisfied with the response or does not receive a response within five (5) working days from Level 1, the complaint may be escalated to the Customer Grievance Redressal Department (SPARSH) through the Company's designated toll-free (18002123123) helpline, official grievance email ID ([clientgrievance@satincreditcare.com](mailto:clientgrievance@satincreditcare.com)), or by written communication to the Corporate Office.

### 7.4.3. Level 3:

If the complaint remains unresolved within fifteen (15) days from the previous level, the matter may be escalated to the PNO / GRO ([PNO@satincreditcare.com](mailto:PNO@satincreditcare.com)) at the Head Office for further review and appropriate action.

The Company shall ensure that each level of escalation is documented in the centralized grievance system and monitored for timely resolution.

## 7.5. External Escalation

If the complaint remains unresolved or the customer is not satisfied with the resolution provided at the internal levels:

### 7.5.1. Level 4 – Escalation to Self-Regulatory Organization (SRO):

The customer may escalate the complaint to the concerned SRO, including MFIN (Toll-Free – 18001021080) & Sa-Dhan (011-47174418), in accordance with applicable COC guidelines.

### 7.5.2. Level 5 – Escalation to Reserve Bank of India (RBI):

If the grievance remains unresolved within one month (30 Days) from the date of initial complaint, or if the customer is dissatisfied with the response, the customer may lodge a complaint under the RBI Integrated Ombudsman Scheme through the RBI CMS portal, <http://cms.rbi.org.in/>.

Details of SRO and RBI escalation mechanisms shall be prominently displayed at branches, printed in loan-related documents, and communicated in complaint acknowledgements.

## 7.6. Communication of Closure

Upon resolution of the complaint, the Company shall inform the customer of:

- The outcome of the complaint;
- The reasons for the decision, where applicable; and
- The right to further escalation, including approach to SRO or RBI, if dissatisfied.

Closure confirmation shall be provided to the customer through SMS/email/letter and all closures shall be properly recorded in the centralized grievance system.

## 7.7. Record Retention

All grievance records, including complaint details, investigation notes, correspondence, resolution communication, and escalation documentation, shall be preserved for a minimum period of five (5) years from the date of closure of the complaint, or such longer period as may be prescribed under applicable regulatory or statutory requirements.

## 8. Customer Awareness and Disclosure

The Company shall ensure that customers are adequately informed about the grievance redressal mechanism through clear, accessible, and multilingual communication at all customer touchpoints. Disclosure practices shall comply with applicable RBI regulations and SRO guidelines.

### 8.1. Disclosure at Loan Application and Disbursement

At the time of loan application and disbursement, customers shall be informed, verbally and/or in writing and such disclosure shall be made in a language understood by the customer, about:

- The toll-free grievance helpline number;
- The official grievance email ID and postal address;
- The internal escalation mechanism, including escalation to the PNO/GRO;
- The external escalation mechanism, including approach to the concerned SRO and RBI under the Integrated Ombudsman Scheme;
- The expected TAT for resolution of complaints.

## 8.2. Branch Display

All branches and business locations shall prominently display, in English, Hindi, and the relevant regional language:

- CGRM contact details;
- Stepwise escalation process (Level 1 to Level 5, as applicable);
- Expected TAT for grievance resolution;
- Name/designation and contact details of the PNO/GRO;
- Contact details of the concerned SRO; and
- Details of RBI's Integrated Ombudsman Scheme and CMS portal.

Displays shall be placed in customer-accessible areas and maintained in updated conditions at all times.

## 8.3. Website Disclosure

The Company's official website shall prominently and transparently display:

- All grievance registration channels;
- The internal escalation matrix;
- Expected TAT for resolution;
- Contact details of the PNO / GRO;
- Contact details of the concerned SRO; and
- Information regarding escalation to RBI under the Integrated Ombudsman Scheme, including CMS portal details.

The website shall be reviewed periodically to ensure accuracy and regulatory compliance.

## 9. Employee Training and Accountability

The Company recognizes that an effective grievance redressal mechanism depends on employee awareness, accountability, and adherence to customer protection principles. Accordingly, structured training and performance oversight mechanisms shall be implemented across the organization.

### 9.1. Induction Training

The CGRM shall form a mandatory component of the induction training program for all new employees, including customer-facing staff, branch personnel, recovery agents, call centre staff, and third-party service providers engaged in customer interaction.

The induction program shall cover grievance registration procedures, escalation mechanisms, defined TAT standards, customer protection principles, and regulatory obligations.

## 9.2. Refresher Training

Periodic refresher training on CGRM shall be conducted at least annually for all relevant employees.

Refresher sessions shall reinforce regulatory requirements, escalation protocols, complaint categorization standards, and ethical conduct expectations. Training records should be maintained and monitored by the concerned department.

## 9.3. Knowledge Assessment

The Company shall conduct periodic assessments to evaluate employee understanding of CGRM processes and regulatory requirements.

Such assessments may include internal evaluations, audits, field reviews, or structured testing mechanisms. Employees identified with knowledge gaps shall undergo re-training.

## 9.4. Performance Appraisal

Adherence to CGRM standards shall form part of the performance evaluation framework for relevant employees. Key parameters may include timely complaint registration, compliance with TAT standards, quality of resolution, and adherence to customer conduct norms. Persistent non-compliance may impact performance ratings, incentives, or career progression.

## 9.5. Disciplinary Action

Any misconduct, negligence, coercive behaviour, regulatory violation, or unethical practice leading to customer grievances shall invite appropriate disciplinary action in accordance with the Company's HR policies and Code of Conduct.

Depending on the severity, frequency, and nature of the misconduct, disciplinary measures may include, but shall not be limited to:

- **Issuance of Warning Letter** - A formal written warning may be issued to the concerned staff member, clearly specifying the nature of the misconduct and consequences in case of recurrence.
- **Transfer** - The staff member may be transferred to another location or role as a corrective or preventive measure.
- **Impact on Promotion or Benefits** - The misconduct may render the staff member ineligible for promotion, incentive payout, or other employment benefits for a defined period.
- **Termination of Employment** - In cases of serious misconduct, regulatory breach, fraud, coercive recovery practices, or repeated violations, the Company reserves the right to terminate the services of the staff member in accordance with applicable laws and internal policies.

All disciplinary actions shall be documented appropriately to ensure accountability and regulatory compliance.

## 10. Customer Satisfaction and Feedback

The Company shall establish a structured mechanism to assess customer satisfaction with respect to the handling and resolution of grievances, with the objective of strengthening service quality and customer protection standards.

Post-resolution feedback may be collected through outbound calls, SMS-based surveys, digital channels, or other appropriate modes, as determined by the Company from time to time.

Customer satisfaction metrics shall be monitored periodically and may include, inter alia:

- Timeliness of resolution;
- Clarity of communication;
- Fairness of outcome;
- Overall customer experience during grievance handling.

The findings from customer feedback shall be analyzed and placed before Senior Management periodically. Where systemic gaps or recurring dissatisfaction trends are identified, corrective and preventive actions shall be initiated.

The feedback mechanism shall form part of the Company's continuous improvement and shall be aligned with applicable SRO and Client Protection Standards.

## **11. Monitoring and Reporting**

The Company shall maintain a structured monitoring and reporting framework to ensure effective oversight of the CGRM and to identify systemic issues requiring corrective action.

### **11.1. Centralized Consolidation**

All complaints received through any channel shall be recorded and consolidated in a centralized grievance management system. The centralized system shall enable tracking of complaint status, escalation levels, resolution timelines, and closure details to ensure transparency and regulatory compliance.

### **11.2. Complaint Analysis**

Complaints shall be analyzed periodically to identify trends, recurring issues, and areas requiring process improvement. The analysis shall include, inter alia:

- Location-wise distribution of complaints;
- Category-wise classification;
- Compliance with defined TAT standards;
- Resolution status (open, closed, escalated);
- Recurrence trends and repeat complaints; and
- Identification of systemic or operational gaps.

The outcome of such analysis shall be used for strengthening internal controls and service delivery standards.

### **11.3. Management and Board Reporting**

Structured reports on grievance statistics and analysis shall be prepared and shared as follows:

- Monthly reporting to Senior Management for operational oversight and corrective action;
- Quarterly reporting to the Board of Directors or a Board-designated Committee, covering complaint trends, severe complaints, TAT compliance, systemic observations, and remedial measures undertaken.

## 12. Internal Audit and Compliance Review

The Internal Audit function shall periodically review the effectiveness and adherence to the CGRM. The audit scope shall include, inter alia:

- Accuracy and consistency in categorization of complaints;
- Compliance with the defined internal escalation mechanism;
- Adherence to TAT standards;
- Compliance with branch display and disclosure requirements;
- Adequacy of employee training records;
- Validation of customer awareness regarding grievance channels.

Audit observations and recommendations shall be documented and placed before Senior Management. Significant findings, systemic issues, or regulatory concerns shall also be reported to the Board or the relevant Board-designated Committee. Corrective and preventive actions arising out of audit findings shall be tracked to closure.

## 13. Continuous Improvement

The Company shall adopt a structured and proactive approach toward continuous improvement of its CGRM. Periodic reviews of complaint trends, root cause analysis, audit findings, customer feedback, and regulatory observations shall be undertaken to identify systemic gaps and areas requiring enhancement.

Based on such reviews, the Company shall initiate appropriate corrective and preventive actions, which may include, inter alia:

- Process enhancements to strengthen internal controls and reduce recurrence of complaints;
- Product modifications or feature refinements to address recurring customer concerns;
- Improvements in communication materials, customer disclosures, and awareness initiatives;
- Strengthening of training programs and operational oversight mechanisms.

The effectiveness of such corrective measures shall be monitored periodically by Senior Management and reported, where appropriate, to the Board of Directors.

## 14. Dedicated Recovery-Related Grievance Mechanism

In accordance with the *Reserve Bank of India (Regulatory Framework for Microfinance Loans) Directions, 2022*, the Company shall maintain a dedicated and clearly identifiable mechanism for handling recovery-related grievances. Recovery-related grievances may include complaints pertaining to, inter alia:

- Coercive or inappropriate recovery practices;
- Harassment or intimidation by staff or agents;
- Unauthorized collection of charges;
- Non-issuance of receipts or improper acknowledgment of payments;
- Violation of approved recovery timelines or conduct standards.

Such complaints shall be treated with priority and escalated through the defined internal escalation mechanism, including review by the PNO, where required.

The details of the recovery grievance mechanism, including contact channels and escalation options, shall be:

- Communicated to borrowers at the time of loan disbursement;
- Printed in the Loan Card and relevant loan documents; and
- Displayed prominently at branch locations and on the Company's website.

The Complaints relating to outsourced agencies and recovery agents shall be treated as complaints against the Company. The Company shall ensure that recovery-related complaints are monitored closely, and any misconduct identified shall invite appropriate disciplinary action in accordance with internal policies and regulatory requirements.

*Any deviation from the provisions of this Policy shall be exceptional in nature, properly documented with detailed justification, and reported to Senior Management for review and oversight. Such deviations, if material, shall also be placed before the Board or the relevant Board-designated Committee, as deemed appropriate.*

### 15. Policy Approval, Review, and Sign-Off Matrix

Author	Designation	Date	Signature
<b>Pravupada Pandit</b>	Sr. Associate - Operational Excellence & Customer Services		
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Reviewer	Designation	Date	Signature
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Approving Authority	Designation	Date	Signature
<b>Anil Kwatra</b>	Chief Business Officer		
<b>Vikas Wadhera</b>	Chief Risk Officer		

End\*\*\*