



SATIN Creditcare Network Limited

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1. Abbreviation Table

The following abbreviations and terms are used throughout this Policy for ease of reference and consistency. All SCNL officials, employees, and representatives involved in loan origination, appraisal, approval, documentation, disbursement, servicing, monitoring, customer engagement, and grievance redressal are required to be familiar with these abbreviations.

Abbreviation	Full Form / Meaning
SCNL	Satin Creditcare Network Limited
RBI	Reserve Bank of India
NBFC	Non-Banking Financial Company
MFI	Microfinance Institution
SRO	Self-Regulatory Organization
FPC	Fair Practices Code
CGRM	Customer Grievance Redressal Mechanism
IO	Internal Ombudsman
PNO	Principal Nodal Officer
CSA App	Customer Service Application
KFS	Key Fact Statement
APR	Annual Percentage Rate
JLG	Joint Liability Group
CIC	Credit Information Company
LMS	Loan Management System

2. Introduction

Satin Creditcare Network Limited (“SCNL” or “the Company”) is committed to building long-term, transparent, fair, and respectful relationships with its customers. As a responsible NBFC-MFI, SCNL recognizes that customer relations extend beyond loan disbursement and repayment and cover every interaction between the Company and its customers throughout the customer lifecycle.

This Policy on Customer Relations (“Policy”) establishes a comprehensive framework governing SCNL’s approach to customer engagement, communication, service delivery, grievance redressal, information disclosure, and protection of customer rights. The Policy incorporates regulatory requirements issued by the RBI, *CEPD.CO.PRDI/ S1 127 /1 3-01-00912023-24*, dated 02 December 2024 on *Handling of Customer Complaints*, along with applicable industry codes.

The Policy aims to ensure that customers are treated with dignity, fairness, empathy, and transparency at all stages of engagement, while also protecting the Company’s interests through standardized, compliant, and accountable processes.

3. Objective

The primary objectives of this Policy are:

- Establish uniform standards for customer interactions.
- Ensure fair, transparent, and ethical treatment of customers.
- Promote informed decision-making through clear disclosures.
- Define customer rights and obligations.
- Strengthen accountability in service delivery and grievance handling.
- Enhance customer trust and long-term relationship with SCNL.

4. Scope & Applicability

This Policy applies to:

- All existing, prospective, and active customers of SCNL.
- All employees, field staff, branch officials, call-center personnel, and senior management.
- All outsourced agencies and service providers acting on behalf of SCNL.
- All customer interaction channels including branches, center meetings, field visits, digital platforms, and CSA App.

This Policy shall be read in conjunction with SCNL’s Credit Policy, Fair Practices Code, CGRM Policy, Internal Ombudsman Policy, and other customer-facing policies. In case of conflict, RBI regulations shall prevail.

5. Governance and Policy Review

This policy may be revised by the Operational Excellence & Process Re-Engineering Department in response to evolving business or regulatory requirements, subject to approval by the designated Authority or Committee. Any updates will be promptly communicated to all relevant stakeholders. The Company Board shall review this policy annually to ensure its continued relevance, regulatory compliance, and effectiveness.

6. Guiding Principles of Customer Relations

All customer interactions at SCNL shall be guided by clearly defined principles that ensure fairness, transparency, accountability, and customer protection across the entire loan lifecycle. These

principles apply uniformly to all employees, field staff, branches, digital platforms, call centers, and third-party representatives acting on behalf of the Company.

6.1. Fairness and Respect

SCNL shall treat all customers with dignity, respect, and professionalism at all times. No customer shall be subjected to discrimination, coercion, intimidation, harassment, or any form of inappropriate conduct, irrespective of socio-economic background, gender, religion, literacy level, or geographical location.

Employees and representatives of the Company are required to maintain courteous and ethical behaviour in all interactions. Special care and sensitivity shall be exercised while dealing with vulnerable customers, including first-time borrowers, elderly persons, or customers facing financial distress.

6.2. Transparency and Disclosure

SCNL shall ensure complete transparency in all dealings with customers. Customers shall be provided clear, accurate, and timely information regarding loan amount, interest rate and APR, tenure, repayment schedule, processing fees, insurance premiums (if applicable), penal charges, prepayment or closure conditions, and available grievance redressal channels.

All disclosures shall be made in a manner understandable to the customer and, wherever required, in the local or vernacular language. No charge or fee shall be levied unless it has been explicitly disclosed. Any change in loan terms or charges during the tenure shall be communicated in advance and shall be applied only prospectively in accordance with regulatory requirements.

6.3. Informed Consent

SCNL shall obtain free, voluntary, and informed consent from customers for all loan-related transactions and associated services. Consent shall be obtained only after providing a clear explanation of the nature, purpose, and implications of the transaction.

Consent shall be appropriately documented through signed forms, digital acknowledgements, OTP-based confirmations, or system records, as applicable. Customer consent shall be obtained for loan sanction and disbursement, deduction of fees or insurance premiums, enrollment under insurance products, sharing of data with CICs, digital access, and any other related services.

6.4. Accessibility and Responsiveness

SCNL shall ensure that customers have convenient and equitable access to service and grievance redressal channels. Customers may approach the Company through branch offices, center meetings, field interactions (for permitted purposes), toll-free call centers, official email IDs, the CSA App, complaint registers, and complaint boxes.

Digital channels are intended to enhance convenience; however, customers shall not be denied physical or assisted services on the ground that digital facilities are available. All customer queries, service requests, and complaints shall be addressed within defined turnaround timelines, and customers shall be kept informed of the status of their requests.

6.5. Privacy and Confidentiality

SCNL recognizes the importance of safeguarding customer information. Customer data shall be collected, processed, stored, and shared strictly for legitimate business or regulatory purposes and in accordance with applicable laws and internal data governance policies.

Access to customer information shall be restricted to authorized personnel. Data shall be shared with third parties only as permitted by law and with appropriate consent where required. Adequate physical, technical, and administrative safeguards shall be maintained to prevent unauthorized access or misuse. Any data breach or confidentiality lapse shall be escalated and addressed in line with internal policies and regulatory norms.

6.6. Accountability and Oversight

SCNL shall maintain accountability in all customer-facing activities. Customer interactions, transactions, service requests, and grievance records shall be properly documented and maintained in relevant systems to ensure traceability and auditability.

Supervisory checks, internal audits, and management reviews shall be conducted periodically to assess adherence to these principles. Complaint trends, service quality indicators, and customer-related compliance matters shall be reviewed by senior management and placed before the Board or its designated committee at regular intervals to ensure effective oversight.

7. Customer Lifecycle Approach

SCNL adopts a lifecycle-based approach to customer relations, covering:

- Customer awareness and onboarding
- Loan application and appraisal
- Sanction, documentation, and disbursement
- Loan servicing and communication
- Repayment, collections, and support
- Grievance handling and escalation
- Loan closure and post-closure services

8. Customer Onboarding and Communication Standards

Customer onboarding is a critical stage in establishing a transparent and responsible relationship between SCNL and its customers. The onboarding process shall be conducted in a structured, fair, and informative manner to ensure that customers clearly understand the nature of the financial obligation they are undertaking and their rights and responsibilities under the loan arrangement.

8.1. Structured Onboarding

SCNL shall ensure that onboarding is carried out in accordance with approved operational manual and internal policies. During this stage, customer eligibility criteria, the purpose of the loan, and, where applicable, the responsibilities under the JLG model shall be clearly explained. Customers shall be made aware of repayment discipline, group accountability, and the implications of default.

Compulsory onboarding activities such as CGT, GRT, and pre-disbursement meetings shall be conducted as prescribed under the Operations Manual. These steps shall not be bypassed except where specifically permitted under policy. Attendance records, acknowledgements, and related documentation shall be properly maintained to ensure transparency and auditability of the onboarding process.

8.2. Communication and Customer Awareness

All communication during onboarding shall be clear, accurate, and easy to understand. Customers shall be informed of key loan terms, including repayment obligations, instalment amounts, tenure,

applicable fees, and insurance coverage, where opted and or as applicable. They shall also be informed of available grievance redressal channels and their rights and obligations as borrowers.

Explanations shall be provided in a language understood by the customer, preferably the local or vernacular language where necessary. Adequate opportunity shall be given to customers to ask questions and seek clarification before proceeding with loan acceptance.

8.3. Ethical Conduct

SCNL shall ensure that the onboarding process is conducted in an ethical and transparent manner. Forced product bundling, misleading statements, false assurances, or pressure-based selling practices are strictly prohibited. Customers shall not be compelled to purchase insurance or any additional product as a precondition for availing the loan, unless such requirement is mandated by policy and clearly disclosed.

Any insurance or supplementary product shall be offered only with the customer's voluntary and informed consent. All consents and acknowledgements obtained during onboarding shall be properly documented and retained as part of the official record.

9. Loan Documentation and Disclosure

SCNL is committed to ensuring that all loan-related documentation and disclosures provided to customers are clear, complete, and transparent. Proper documentation and timely disclosure form the foundation of an informed and fair lending relationship. All employees involved in loan sanctioning, documentation, and disbursement shall adhere strictly to the standards prescribed under this Policy.

9.1. Standardized Documentation

SCNL shall issue standardized loan documents to every customer at the time of disbursement or as otherwise prescribed. Customers shall receive copies of the Loan Agreement, Sanction Letter-cum-Promissory Note, KFS, and Loan Card. These documents shall clearly capture the terms and conditions governing the loan relationship, including repayment obligations and applicable charges.

Before obtaining customer acknowledgement or signatures, the contents of the documents shall be explained in a language understood by the customer, preferably the local or vernacular language where required. Customers shall be informed of their right to retain copies of these documents for their records and future reference.

9.2. Key Fact Statement (KFS)

The Key Fact Statement (KFS) shall be provided to every customer prior to loan disbursement in the format prescribed by the RBI. The KFS shall serve as the primary disclosure document and shall clearly specify, at a minimum, the sanctioned loan amount, interest rate and APR, tenure, instalment amount and repayment schedule, processing fees, insurance premium (if applicable), and details of the grievance redressal mechanism.

The KFS shall be explained to the customer to ensure understanding, and acknowledgement of receipt shall be obtained through appropriate documentation or system records. No fee, charge, or financial obligation shall be imposed on the customer unless it has been explicitly disclosed in the KFS and related loan documentation.

9.3. Communication During Loan Tenure

SCNL shall maintain transparency throughout the loan tenure. Any change in interest rate, charges, repayment schedule, or other material loan terms shall be communicated to the customer in advance and in a clear and understandable manner. Such changes shall be applied only prospectively and strictly in accordance with applicable regulatory guidelines and approved internal policies.

Customers shall not be subjected to retrospective charges or undisclosed modifications to loan terms at any stage of the loan lifecycle.

10. Customer Service Channels

SCNL provides multiple customer service channels to ensure that customers can conveniently access assistance, raise queries, submit service requests, and register complaints. These channels are designed to promote accessibility, inclusivity, and timely resolution of issues across all stages of the customer lifecycle. All service channels shall function in coordination with defined service standards and turnaround timelines.

10.1. Branch and Field-Level Services

Branch offices shall serve as the primary point of contact for customers. Branch staff shall be responsible for addressing customer queries, processing service requests, and providing assistance related to loan accounts, repayments, documentation, prepayment or pre-closure, and insurance matters where applicable.

Branches shall maintain complaint registers and complaint boxes as prescribed under regulatory and internal policies. Details of the grievance redressal mechanism, including escalation contacts, shall be prominently displayed at all branch locations. Customers visiting branches shall be attended to in a prompt, polite, and professional manner.

Field staff interactions with customers shall be conducted strictly for permitted operational purposes such as center meetings, servicing, and collections in accordance with approved policies. All such interactions shall be professional, respectful, and free from coercion or inappropriate conduct.

10.2. Call Center and Centralized Support

SCNL shall operate centralized customer support through designated toll-free numbers and official communication channels. Customers may use these channels to seek information, raise service requests, or register complaints without visiting a branch.

All complaints and service requests received through call center or centralized support channels shall be logged in the complaint management system and assigned a unique reference number for tracking purposes. Customers shall be informed of the reference number and the expected resolution timeline. An appropriate escalation mechanism shall be available in cases where complaints remain unresolved or where customers are dissatisfied with the response.

10.3. Digital Channels and CSA App

SCNL provides digital access to customers through the CSA App and other authorized platforms. Through these digital channels, customers may view loan details, track repayment schedules, check outstanding balances, register grievances, and access mandatory disclosures and relevant information.

Digital services are intended to enhance customer convenience and transparency. However, the availability of digital channels shall not replace or restrict access to physical branch services or assisted support, particularly for customers who are not digitally enabled.

11. Customer Rights and Obligations

SCNL believes that a fair lending relationship is based on mutual trust and responsibility. While the Company is committed to protecting customer interests, customers are also expected to fulfil certain obligations to ensure smooth loan servicing.

11.1. Customer Rights

Customers are entitled to fair treatment, transparency, and access to grievance redressal throughout the loan lifecycle. SCNL shall ensure that these rights are protected across all service channels.

Customers have the right to:

- Receive transparent and complete information regarding loan terms, charges, and obligations
- Be treated with dignity, fairness, and respect at all times
- Obtain copies of loan-related documents, including Loan Agreement and KFS
- Register complaints through available channels without fear of retaliation
- Escalate grievances to higher authorities, including PNO, SROs and RBI, as applicable
- Prepay or foreclose the loan in accordance with approved policy and regulatory guidelines

11.2. Customer Obligations

Customers are expected to act responsibly and cooperate with SCNL throughout the loan tenure. Fulfilment of these obligations ensures a disciplined and transparent lending relationship.

Customers are expected to:

- Provide accurate and truthful information during application and onboarding
- Repay instalments on time as per the agreed schedule
- Utilize the loan amount for the stated purpose
- Participate in center meetings, where applicable under the JLG model
- Cooperate during servicing, verification, and recovery activities conducted as per policy

12. Customer Grievance Redressal Framework

SCNL has established a structured and transparent CGRM to ensure timely and fair resolution of customer complaints. The framework is designed to provide easy access, defined timelines, and a clear escalation pathway.

12.1. Complaint Registration

Customers may register complaints through multiple accessible channels to ensure convenience and inclusivity. Complaints may be registered through:

- Branch offices
- Center meetings
- Toll-free customer care number
- Official email ID, and CSA App

12.2. Resolution, and Escalation

SCNL shall endeavor to resolve complaints promptly and within the timelines defined under applicable policies and regulatory guidelines.

- Complaints shall be resolved within prescribed turnaround times
- Escalation to the PNO shall be available where required
- Complaints eligible under RBI guidelines shall be reviewed by the IO
- Root cause analysis shall be conducted for recurring or systemic issues, and corrective actions shall be implemented

13. Role of Principal Nodal Officer (PNO)

The PNO shall be the designated senior official responsible for overseeing the effective implementation of SCNL's CGRM. The PNO shall ensure fairness, timeliness, and regulatory compliance in grievance handling. The PNO shall:

- Oversee the functioning of the grievance redressal framework
- Act as the escalation authority for unresolved or dissatisfied complaints
- Ensure compliance with applicable RBI directions and internal policies
- Coordinate with RBI and other regulatory authorities, where required

The contact details of the PNO shall be prominently displayed at branches, offices, and on the Company's official website.

14. Role of Internal Ombudsman (IO)

In accordance with RBI directions, SCNL has appointed an IO to independently review eligible customer complaints. The IO mechanism strengthens impartiality and transparency in grievance handling.

- Complaints partly resolved or wholly rejected by the Company shall be reviewed by the IO, as applicable
- The IO shall function independently of operational management
- Decisions and recommendations shall be reasoned and properly documented
- IO recommendations shall not be rejected without appropriate authority, justification, and recorded reasons

15. Ethical Collections and Customer Protection

SCNL is committed to ensuring that all recovery and collection activities are conducted in a fair, lawful, and respectful manner. Customer dignity and protection shall remain paramount during all servicing and recovery interactions.

- No coercive, abusive, or aggressive recovery practices shall be permitted
- No public humiliation, intimidation, or harassment of customers shall be allowed
- Collections shall be conducted only at permitted locations and during approved timings as per policy and regulatory guidelines
- Special sensitivity shall be exercised in cases involving death, illness, natural calamities, or financial distress

16. Data Privacy and Credit Information

SCNL shall safeguard customer data and ensure responsible handling of credit information in accordance with applicable laws and RBI guidelines. Confidentiality and accuracy shall be maintained at all times.

- Customer consent shall be obtained wherever required for data usage and sharing
- Credit information shall be reported to CICs accurately and in a timely manner
- Customers may request correction of credit records through prescribed procedures
- Appropriate technical and administrative security safeguards shall be maintained to protect customer information

17. Policy Approval, Review, and Sign-Off Matrix

Author	Designation	Date	Signature
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Approving Authority	Designation	Date	Signature
Anil Kwatra	Chief Business Officer	30.03.26	A. Kwatra
Vikas Wadhera	Chief Risk Officer	30.03.2026	V. Wadhera

End***