# <u>GRIEVANCE REDRESSAL POLICY</u> <u>NSMK INVESTMENTS PRIVATE LIMITED</u>

NSMK Investment Pvt. Ltd.	Approval Date: XX	Monitored by -
Grievance Redressal Policy	Version: 1.0 of 2023	

Author	
Reviewer	
Approver	

#### **INTRODUCTION**

NSMK Investment Pvt. Ltd. is registered with Reserve Bank of India and holds a Non-Banking Financial Company license and incorporated under the provision of the Companies Act, 1956 and is in the business of lending and lending through its branches and partners. The Master Directions mandate the Company to formulate and disclose a Board approved "Grievance Redressal Policy" to protect the rights of the Customers. Additionally, the Master Directions require the Company to appoint a Nodal Grievance Redressal Officer and institute a mechanism in place for a Customers concerns.

NSMK Investment Pvt. Ltd. is fully committed to delivering consistent and exemplary service to all Customers, fostering our continued growth. Our grievance redressal policy is meticulously designed to effectively address any issues that may arise on our platform. The primary objective of minimizing the likelihood of recurrence and establish a well-structured framework for addressing grievances at every level. This policy ensures fair and just treatment of all feedback, request, queries, complaints, or grievances in strict accordance with our established rules and regulations. Our paramount goal is to provide a secure and transparent platform for all customers, and we spare no effort to attain this objective. We place immense value on our relationships with customers, irrespective of their tenure, size, volume or any other parameter and uphold the utmost significance of maintaining these relationships. We acknowledge that certain issues may necessitate escalation beyond the initial level, which is precisely why this policy encompasses a comprehensive redressal mechanism that caters to concerns at all levels.

# **BASIS**

The Grievance Redressal Mechanism Policy has been established in accordance with Clause 13 of the Master Directions - Non-Banking Financial Company - Lending Platform (Reserve Bank) Directions, 2017 ("Master Directions"), as issued by the Reserve Bank of India (RBI) and approved by the Board of the company.

### **OBJECTIVE**

The objective of this policy is to outline the policies and procedures governing the receipt, handling, and response to grievances raised by Customers. The following principles apply to the handling of grievances:

- > All Customers are treated fairly and equitably and without prejudice at all times.
- All Complaints raised by Customers shall be dealt with courtesy and resolved in a timely manner.
- All Customers shall be informed of avenues to escalate their complaints within the organization, and their rights if they are not satisfied with the resolution of their complaints.
- Compliance with the regulatory guidelines as required for this function.

### **KEY DEFINITIONS**

- "Customers " person who has entered into a lending arrangement with NSMK Investment Pvt. Ltd.
- "Nodal Officer" refers to the Officer appointed by the NSMK Investment Pvt. Ltd. to manage Customers Grievances/Complaints and ensure their redressal in accordance with the prescribed process, Turn-Around-Time (TAT) and the escalation matrix.
- "Grievance" or "Complaints" or "Query" refers to any representation or allegation made in writing or through electronic means, containing a grievance alleging deficiency in service. Additionally, Grievance or Complaints or Query can be lodged against inappropriate conduct, acts of omission or commission, however, any feedbacks/explanations or Requests will not be considered as Grievances or Complaints;

# **GRIEVANCE REDRESSAL POLICY**

**NSMK Investment Pvt. Ltd.** is committed to addressing any grievances by its customers with the utmost attention and support. We are committed to diligently explore effective solutions through various communication channels, including in-person, written, or verbal means. To facilitate a quicker and fair resolution process, customers are required to include their application number, sanction number, or loan account number in all correspondences related to their complaint or request along with the registered mobile number.

It is important to note that anonymous complaints will not be considered under the provisions of this Grievance Redressal Mechanism. Complaints received from the registered mobile number or email or a written letter with the proof of complaint that he is a customer will only be considered.

# **GRIEVANCE MECHANISM SYSTEM & PROCESS**

**NSMK Investment Pvt. Ltd.** strives to maintain a consistent and high-quality service to our valued Customers while diligently striving to minimize the incidence of grievances. However, it explicitly informs the Customers on the Platform, clearly indicate that they can raise and record any grievances in relation to the Platform and the service provided by **NSMK Investment Pvt. Ltd.** 

**NSMK Investment Pvt. Ltd.** has designed the mechanism to ensure that its Customers can seamlessly register their complaints via a multi-channel set-up. Additionally, the mechanism has a 3-step escalation matrix to ensure that a Customer is provided with adequate appeals. We have also instituted Turn Around Time (TATs) within the mechanism at different stages to ensure time-bound redressal of complaints.

To register a complaint or grievance, the Customers can avail of any of the following options:

# A. Phone

Customers can call the Company's dedicated helpline number \_\_\_\_\_\_between 10:00 a.m. to 7:00 p.m. from Monday to Saturday , except public holiday.

# B. Email

Customers can write to the **NSMK Investment Pvt. Ltd.** at this email Id \_\_\_\_\_\_with the subject line "**Complaint & Grievance Register with Loan ID**"

# C. Letter

Customers can write to the NSMK Investment Pvt. Ltd. at -

# NSMK Investment Pvt. Ltd.

Office No.1, Ground Floor, NSG Crown, SR, No 52/1/13 Narhe, road, Wadgaon Budruk, Narhe, Pune, Maharashtra, India-411041

# **REDSESSAL PROCEDURE**

# Level -1:

**NSMK Investment Pvt. Ltd.** operates as an online peer-to-peer platform, All complaints received through the channels will be tracked in our register and solution will be provided within the TAT.

To file a grievance, Customers must provide the following registered account information: Loan ID, Name and Registered Mobile number. Grievances should be submitted from the registered email address associated with the account. Or a written letter with the proof that the complaint is from the customer or from the registered mobile number.

Upon receipt, **NSMK Investment Pvt. Ltd.** will diligently examine the matter and accordingly communicate in writing/email/phone, its response on the same to the customers within a maximum period **5 (Five) Business working days**, from the date of receipt of the formal grievance correspondence. If the resolution requires more time, suitable justification shall be provided and customer will be informed on the additional timelines required.

# Level -2:

If the Complaint is unresolved post the 5 (Five) working days timeline in Level – 1, then it will be automatically escalated to Level – 2. Additionally, if the customer is not satisfied with the resolution provided by the representative or if the customer does not get a response from the representatives within the defined timeline, then the customer can escalate his/her Grievance to the Level - 2. The Customers must submit grievances or complaints formally via email to

Upon receipt, Representative will then endeavor to resolve the grievance within 10 (Ten) **Business days**, of acknowledging the Complaint, else the representative will intimate the Customer regarding the delay in complaint resolution.

In the event that the Company does not receive any further correspondence from the Customer within **7 (seven) working days** after sending the response regarding the complaint or grievance

to the Customer, it will be deemed that the complaint or grievance has been satisfactorily resolved to the Customer's contentment.

## Level -3:

If the Customer does not receive any response from the Company **within fifteen (5+10) Business days**, the Customer has the right to escalate their grievance to the designated Grievance Redressal Officer of the Company. The contact details of the Grievance Redressal Officer are as follows:

# Name: Mr. V. Balamurugan

Office No.1, Ground Floor, NSG Crown, SR, No 52/1/13 Narhe, road, Wadgaon Budruk, Narhe, Pune, Maharashtra, India-411041

Email: \_\_\_\_\_

Telephone: \_\_\_\_\_

Upon receipt of the grievance, the Grievance Redressal Officer shall undertake a comprehensive review of the matter. The Customer's grievance or complaint shall be addressed and resolved within fifteen (15) working days from the date of receipt of the grievance by the Grievance Redressal Officer.

If a grievance remains unresolved or not resolved to the satisfaction of the customers and is not redressed within a period **of 30 (thirty) Business days** from the date of registering the grievance without any update from our end, the Customer has the right to approach to **the Customer Education and Protection Department** of the Reserve Bank of India (RBI) for redressal. The contact details of the designated authority are as follows:

The General Manager, CEPD

Reserve Bank of India

Department of Non-Banking Supervision, Central Office, Centre I, World Trade Centre, Mumbai-400005

# FORCE MAJEURE

**NSMK Investment Pvt. Ltd.** shall not be liable to compensate Customers for delayed resolutions if some unforeseen event (including but not limited to epidemic, pandemic (as declared by the World Health Organization) lockdown, acts of God; fire; explosion; any law, order or regulation of the Republic of India or other national, state or local government or any civil or military authority; or by national emergencies, wars or strikes, damage to **NSMK Investment Pvt. Ltd.** or of its agents, absence of the usual means of communication or all types of transportation, etc., beyond the control of **NSMK Investment Pvt. Ltd.** prevents it from performing its obligations.

# POLICY REVISION

This Policy is subject to revision in accordance with the guidelines issued periodically by the Reserve Bank of India. **NSMK Investment Pvt. Ltd.** will periodically (annually) reviews of the Policy and the functioning of the grievances redressal mechanism across different management

levels. The Board of Directors of **NSMK Investment Pvt. Ltd.** retains the exclusive authority to effectuate any requisite alterations, amendments, or modifications to the Policy at regular intervals as deemed necessary. Such revisions shall be executed in strict adherence to applicable legal and regulatory requirements, ensuring the Policy remains compliant with all pertinent laws and regulations. This provision underscores the **NSMK Investment Pvt. Ltd.** commitment to maintaining a robust and effective grievance redressal mechanism, in line with the highest standards of Corporate Governance and Customer service.